

**FINAL  
BLUEPRINT SD INITIATIVE, HILLCREST FOCUSED PLAN AMENDMENT,  
AND UNIVERSITY COMMUNITY PLAN UPDATE  
PROGRAM EIR**

**San Diego, CA  
SCH No. 2021070359  
July 2024**



**FINAL DRAFT**  
**PROGRAM ENVIRONMENTAL**  
**IMPACT REPORT**

SCH No. 2021070359

**SUBJECT: BLUEPRINT SD INITIATIVE, HILLCREST FOCUSED PLAN AMENDMENT TO THE UPTOWN COMMUNITY PLAN, AND UNIVERSITY COMMUNITY PLAN AND LOCAL COASTAL PROGRAM UPDATE**

**Applicant:** City of San Diego City Planning Department

**DRAFT DOCUMENT – July 11~~March 14~~, 2024:**

In response to comments received during public review, minor revisions and clarifications have been made to the document which do not change the conclusions of the Draft Program Environmental Impact Report (PEIR) regarding the project’s potential environmental impacts and required mitigation. As defined in CEQA Guidelines Section 15088.5, minor revisions and clarifications to the document – which are shown in ~~strikeout~~/underline format – do not represent “significant new information” and, therefore, recirculation of the Draft PEIR is not warranted. No new significant environmental impacts would occur from these modifications, and similarly, no substantial increase in the severity of environmental impacts would occur.

**PROJECT DESCRIPTION:**

*Blueprint SD Initiative*

The General Plan provides a policy framework for land use decisions that balances the needs of the City as required by state law (Government Code Section 65300). It expresses a Citywide vision and provides a comprehensive approach for how the City should develop, provide public services, and maintain and enhance the qualities that define the City of San Diego. The overarching strategy of the General Plan is based on the City of Villages, which focuses growth into mixed-use activity centers that are pedestrian-friendly districts linked to the planned regional transit system.

The General Plan provides a vision and policy framework to guide the development of each of the City’s 52 community planning areas. Community plans are written to refine the General Plan’s citywide policies and provide location-based policies and recommendations to guide development over a 20-to-30-year timeframe. Community plans provide more detailed land use designations and community-specific policies on a wide array of topics including housing, mobility, open space and parks, public facilities, safety, noise, sustainability, environmental justice, urban design, and historic preservation.

The General Plan and community plans play a critical role in meeting the City’s Climate Action Plan (CAP) goals and contributing to the region’s mobility vision and needs. They also help the City implement other citywide policy documents such as the City’s Climate Resilient SD Plan



and the Parks Master Plan. The General Plan and community plans identify land uses and public improvements that work toward achieving the citywide mobility mode share goals. As such, the City has shifted away from accommodating additional vehicular travel to instead focus on reducing vehicular travel through strategic land use planning, primarily by locating new development within walking distance to transit stops and stations, and through investments in walking/rolling, bicycling, and transit improvements.

The Blueprint SD Initiative includes a comprehensive amendment to the General Plan to better align the City of Villages Strategy to reflect the latest goals, policies, and plans for housing, mobility and transit, environmental protection, and climate change adaptation and sustainable growth. The Blueprint SD Initiative would amend the General Plan to reflect an updated citywide land use framework designed around the 2050 regional transportation network in the San Diego Association of Government's (SANDAG's) Regional Plan to promote reductions in per capita greenhouse gas (GHG) emissions and vehicle miles traveled (VMT). The Blueprint SD Initiative identifies complementary land use, transportation, and related policies to support future development according to the revised land use framework. The land use and policy amendments would build upon the climate goals outlined in the City's CAP and Climate Resilient SD Plan.

#### *Hillcrest Focused Plan Amendment to the Uptown Community Plan (Hillcrest FPA)*

The Hillcrest FPA proposes an amendment to the Uptown Community Plan to redesignate approximately 380 acres of the Hillcrest and Medical Complex neighborhoods with land uses that follow a similar pattern to the planned land uses from the 2016 Uptown Community Plan Update with increases to the planned residential density and non-residential development capacity. The Hillcrest FPA establishes an updated vision and objectives that align with the SANDAG Regional Plan and the City's General Plan policies, including those proposed and amended by the Blueprint SD Initiative and the City of Villages Strategy, as well as recently adopted policies from the CAP, Parks Master Plan, and Climate Resilient SD. The amendment would provide the opportunity for additional homes in the Hillcrest FPA area and is intended to encourage active transportation and provide more opportunities for quality public spaces. By providing the opportunity for additional homes near the employment center of the Medical Complex neighborhood, in an area with access to high frequency public transit and coupled with mobility improvements, the Hillcrest FPA would encourage active transportation and reduce automobile trips for work commutes.

The Hillcrest FPA will update the land use plan and zoning for the Hillcrest FPA area, amend the existing Community Plan Implementation Overlay Zone (CPIOZ) - Type A - Building Heights within the Uptown Community Plan area, create three new CPIOZ areas (the Hillcrest District, the Hillcrest Historic District, and the Commercial and Entertainment Activity Area), and provide Supplemental Development Regulations (SDRs) for these CPIOZ areas.

#### *University Community Plan and Local Coastal Plan Update (University CPU)*

The University CPU is a comprehensive update to the existing University Community Plan and Local Coastal Program. The University CPU establishes an updated vision and objectives that align with the SANDAG Regional Plan, and the City's General Plan policies, including those proposed and amended by the Blueprint SD Initiative and the City of Villages Strategy, as well as recently adopted policies from the CAP, Parks Master Plan, and Climate Resilient SD. The University Community Plan will update the land use plan and zoning for the community plan area to help achieve the desired vision and objectives for the community. The University CPU



identifies several guiding principles, plan goals and policies, and identifies procedures for plan implementation, as well.

#### **PROJECT LOCATION:**

##### *Blueprint SD Initiative*

The project location is the entire City of San Diego municipal area, as land use policy, community plan updates and future San Diego Municipal Code amendments to implement the Blueprint SD Initiative may apply citywide. Consistent with the Blueprint SD Initiative, the City anticipates that future community ~~Plan-plan~~ updates, specific plans, and focused plan amendments would involve redesignation of existing land uses within specific areas, referred to as the Climate Smart Village Areas. These are areas that have access to existing or planned transit and demonstrate the greatest likelihood to encourage walking/rolling, biking, and transit use.

##### *Hillcrest Focused Plan Amendment to the Uptown Community Plan*

The Hillcrest FPA area is located in the center of the Uptown Community Plan area and encompasses approximately 380 acres of the Hillcrest and Medical Complex neighborhoods. The Hillcrest FPA area is bound by a series of streets and canyons, including Park Boulevard to the ~~west~~east, Walnut Avenue to the south, Dove Street to the west, and the hilltop bluffs along the northern edge of the Medical Complex neighborhood. State Route (SR-) 163 splits the Uptown Community Plan area and the Hillcrest FPA area.

##### *University Community Plan and Local Coastal Plan Update*

The University CPU area is located approximately 13 miles north of Downtown San Diego and includes prominent regional parks and institutions such as Torrey Pines State Natural Reserve, Torrey Pines Golf Course, and the University of California, San Diego (UCSD). Interstate (I-) 5 traverses the center of the community, SR-52 forms the southern border of the community and I-805 runs along the eastern edge within and outside of the community. Marine Corps Air Station (MCAS) Miramar is located along the southeastern border of the community.

#### **ENVIRONMENTAL DETERMINATION:**

The purpose of this document is to inform decision-makers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify possible ways to minimize the significant effects, and describe a reasonable range of alternatives to the project.

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following ~~Draft~~ PEIR in accordance with CEQA. The analysis conducted identified that the proposed project could result in significant and unavoidable impacts in the areas of **Aesthetics, Air Quality, Biological Resources, Cultural Resources, Noise, Hydrology, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities and Service Systems, and Wildfire**. All other impacts analyzed in this Draft PEIR were found to be less than or not significant.

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



**RESULTS OF PUBLIC REVIEW:**

- ( ) No comments were received during the public input period.
- ( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary, and the letters are incorporated herein.
- (-X-) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.



Rebecca Malone, Program Manager  
City Planning Department

March 14, 2024

Date of Draft Report

July 11, 2024

Date of Final Report

Analyst: E. Pascual



## **PUBLIC REVIEW DISTRIBUTION:**

The following agencies, organizations, and individuals received a copy or notice of the Draft PEIR and were invited to comment on its accuracy and sufficiency. Copies of the Draft PEIR and any technical appendices may be reviewed in the office of the City Planning Department, or purchased for the cost of reproduction.

### **FEDERAL GOVERNMENT**

Federal Aviation Administration (1)  
Environmental Protection Agency (19)  
U.S. Fish and Wildlife Service (23)  
Army Corps of Engineers (26)

### **STATE OF CALIFORNIA**

Caltrans District 11 (31)  
Department of Fish and Wildlife (32)  
California Environmental Protection Agency (37A)  
Housing and Community Development (38)  
Natural Resources Agency (43)  
Regional Water Quality Control Board, Region 9 (44)  
Department of Water Resources (45)  
State Clearinghouse (46A)  
California Coastal Commission (47)  
California Air Resources Board (49)  
California Transportation Commission (51)  
California Department of Transportation (51A)  
State Water Resources Control Board (55)  
Native American Heritage Commission (56)  
Office of Planning and Research (57)

### **COUNTY OF SAN DIEGO**

Air Pollution Control Board (65)  
Planning and Land Use (68)  
County Water Authority (73)  
Department of Environmental Health (75)

### **CITY OF SAN DIEGO (AND THEIR CHIEFS OF STAFF)**

Office of the Mayor (91)  
Council President Elo-River, District 9  
Chief of Staff Lydia Van Note, District 9  
Councilmember LaCava, District 1  
Chief of Staff Vicky Joes, District 1  
Councilmember Campbell, District 2  
Chief of Staff Venus Molina, District 2  
Councilmember Whitburn, District 3  
Chief of Staff Codi Vierra, District 3  
Council District 4  
Councilmember von Wilpert, District 5  
Chief of Staff Jamie Fox, District 5



Councilmember Lee, District 6  
Chief of Staff Sara Kamiab, District 6  
Councilmember Campillo, District 7  
Chief of Staff Michael Simonsen, District 7  
Councilmember Moreno, District 8  
Chief of Staff Travis Knowles, District 8

Mayor's Office

Casey Smith, Deputy Chief Operating Officer

Office of the City Attorney

Corrine Neuffer, Chief Deputy Attorney  
Jeanne MacKinnon, Deputy City Attorney  
Shannon Eckmeyer, Deputy City Attorney

City Planning Department

Heidi Vonblum, Director  
Kelley Stanco, Deputy Director  
Tait Galloway, Deputy Director  
Rebecca Malone, AICP, Program Manager  
Coby Tomlins, Program Manager  
Elena Pascual, Senior Environmental Planner  
Jordan Moore, Senior Environmental Planner  
Greg Johansen, Senior Environmental Planner  
Tara Ash-Reynolds, Associate Environmental Planner  
Edgar Ramirez-Manriquez, Associate Environmental Planner  
Zaira Marquez, Associate Environmental Planner  
Vanessa Sandoval, Associate Environmental Planner  
Nathen Causman, Senior Planner  
Suchi Lukes, Senior Planner  
Shannon Corr, Senior Planner  
Bernard Turgeon, Senior Planner  
Kristy Forburger, Development Project Manager III  
Dan Monroe, Senior Planner  
Mike Klein, Program Coordinator

Sustainability and Mobility Department

Phil Trom, Program Manager  
Maureen Gardiner, Senior Traffic Engineer  
Emanuel Alforja, Associate Traffic Engineer  
Leo Alo, Senior Traffic Engineer  
Gerald Chacon, Associate Traffic Engineer  
Claudia Brizuela, Senior Traffic Engineer

Libraries

Central Library, Government Documents (81 & 81A)  
Balboa Branch Library (81B)  
Beckwourth Branch Library (81C)  
Benjamin Branch Library (81D)

Carmel Mountain Ranch Branch Library (81E)  
Carmel Valley Branch Library (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)  
Malcom X Library & Performing Arts Center (81O)  
Mira Mesa Branch Library (81P)  
Mission Hills Branch Library (81Q)  
Mission Valley Branch Library (81R)  
North Clairmont 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 Peñasquitos Branch Library (81BB)  
Read/San Diego (81CC)  
San Carlos Branch Library (81DD)  
San Ysidro Branch Library (81EE)  
Scripps Miramar Ranch Branch Library (81FF)  
Serra Mesa Branch Library (81GG)  
Skyline Hills Branch Library (81HH)  
Tierrasanta Branch Library (81II)  
University Community Branch Library (81JJ)  
North University Branch Library (81JJJ)  
University Heights Branch Library (81KK)

### **Other City 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 (112/115)  
San Diego Gas & Electric (114)

**School Districts**

San Diego Unified School District (132)  
San Diego Community College District (133)  
Chula Vista School District (118)  
Del Mar Union School District (119)  
Grossmont Union High School District (120)  
La Mesa-Spring Valley School District (121)  
Lemon Grove School District (122)  
National School District (123)  
Poway Unified School District (124)  
San Dieguito Union High School (126)  
San Ysidro School District (127)  
Santee School District (128)  
Solana Beach School District (129)  
South Bay Unified School District (130)  
Sweetwater Union High School District (131)

**Community Planning Groups or Committees**

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)  
Clairemont Mesa Planning Committee (248)  
Greater Golden Hill Planning Committee (259)  
Serra Mesa Planning Committee (263A)  
Kearny 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 Mountain Ranch Community Planning Group  
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)  
Fairbanks Country Club Community Planning Group  
Mission Bay Park Committee  
North City Subarea 2 Community Planning Group  
Rancho Encantada Community Planning Group

**Other Agencies, Organizations and Individuals**

San Dieguito River Park (116)  
San Diego River Park Foundation (163)  
San Diego River Coalition (164)  
Sierra Club (165)  
San Diego Canyonlands (165A)  
San Diego Natural History Museum (166)  
San Diego Audubon Society (167)  
Jim Peugh (167A)  
San Diego River Conservancy (168)  
Environmental Health Coalition (169)  
California Native Plant Society (170)  
San Diego Coastkeeper (173)  
Citizens Coordinate for Century 3 (179)  
Endangered Habitats League (182 & 182A)  
League of Women Voters (192)  
Carmen Lucas (206)  
South Coastal Information Center (210)  
San Diego Historical Society (211)  
San Diego Archaeological Center (212)  
Save Our Heritage Organisation (214)  
Ron Christman (215)  
Clint Linton (215B)  
Frank Brown - Inter-Tribal Cultural Resource Council (216)

Campo Band of Mission Indians (217)  
San Diego County Archaeological Society Inc. (218)  
Kuumeyaay Cultural Heritage Preservation (223)  
Kuumeyaay Cultural Repatriation Committee (225)  
Hancock Street Neighborhood Business Association

**NATIVE AMERICAN DISTRIBUTION**

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 the Kumeyaay Nation (225G)  
Sycuan Band of Kumeyaay Nation (225H)  
Viejas Band of Mission Indians (225I)  
Mesa Grande Band of Mission Indians (225J)  
San Pasqual Band of Mission Indians (225K)  
Iipay 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)



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# Blueprint SD Initiative, Hillcrest FPA, and the University CPU Program EIR Letters of Comment and Responses

The following letters of comment were received from agencies, organizations, and individuals during the public review period (March 14, 2024, to April 29, 2024) of the Draft Program Environmental Impact Report (PEIR). A copy of each comment letter along with corresponding staff responses is included here. Some of the comments did not address the adequacy of the environmental document; however, staff has attempted to provide appropriate responses to all comments as a courtesy to the commenter. The comments received did not affect the conclusions of the document. Where responses to comments required minor revisions to the Draft PEIR, changes to the text are shown in strikeout, underline format. Such format shows deletions as strikeout text and additions as underline text.

<b>Federal/State Agencies</b> .....	<b>RTC-5</b>
A1 California Department of Transportation (Caltrans) .....	RTC-6
A2 California Department of Fish and Wildlife (CDFW) .....	RTC-13
A3 U.S. Fish and Wildlife Service (USFWS).....	RTC-40
<b>Organizations</b> .....	<b>RTC-63</b>
O1 Circulate San Diego .....	RTC-64
O2 Climate Action Campaign .....	RTC-72
O3 Forest Advisory Board.....	RTC-79
O4 Friends of Rose Canyon, Shute Mihaly & Weinberger LLP on behalf of.....	RTC-81
O5 Help Save UC .....	RTC-225
O6 Linda Vista Community Group.....	RTC-261
O7 Livable San Diego, DeLano and DeLano on behalf of .....	RTC-265
O8 Neighbors for a Better San Diego.....	RTC-595
O9 Peninsula Community Planning Board.....	RTC-609
O10 San Diego Audubon Society .....	RTC-617
O11 Sierra Club .....	RTC-636
O12 Save Our Heritage Organisation.....	RTC-666
O13 University City Peeps.....	RTC-670
O14 University City Peeps, Law Offices of Andrea Contreras on behalf of.....	RTC-679
O15 University Community Planning Group.....	RTC-685
O16 Uptown United.....	RTC-704
<b>Individuals</b> .....	<b>RTC-713</b>
I1 Atei, Amy .....	RTC-714
I2 Back, Nancy .....	RTC-717
I3 Buer, Linda.....	RTC-719
I4 Beck, Nancy .....	RTC-722
I5 Beck, William .....	RTC-726
I6 Becker, Judy.....	RTC-728

**Individuals (cont.)**

17	Binley, James .....	RTC-731
18	Bonnefous, Celine.....	RTC-733
19	Bradford, Beau.....	RTC-738
110	Breher, William and Joan .....	RTC-740
111	Brezina, Lisa.....	RTC-746
112	Bush, Ruth .....	RTC-750
113	Cartier, Tom.....	RTC-754
114	Carver, Lori .....	RTC-764
115	Chevalier, Kathy and Chuck.....	RTC-768
116	Chou, Hannah .....	RTC-771
117	Clark, Llsa .....	RTC-773
118	Cohen, Jonathan .....	RTC-775
119	Cole, Kendra .....	RTC-780
120	Cotta, Carmela .....	RTC-784
121	Cox, Sandra.....	RTC-788
122	Dangelo, Kristi .....	RTC-790
123	Danner, Don .....	RTC-792
124	Danner, Roxieann .....	RTC-800
125	Davidson, Darcy .....	RTC-804
126	DeMarco, Traci .....	RTC-808
127	DeSarro, Kiah.....	RTC-810
128	Devens, Mike .....	RTC-812
129	Dong, Dongdong.....	RTC-815
130	Dunway, Jennifer.....	RTC-818
131	Engstrom, Julia .....	RTC-911
132	Enos, Susan.....	RTC-913
133	Filippone, Anthony.....	RTC-916
134	Fisher, Marcia .....	RTC-919
135	Frattali, Mike .....	RTC-923
136	Freidt, Gail.....	RTC-925
137	French, Jenn.....	RTC-927
138	Friedman, Ed .....	RTC-930
139	Gehl, Sharon.....	RTC-933
140	Gellman, Barbara.....	RTC-938
141	Gilmor, Sue .....	RTC-943
142	Frederick Gorris .....	RTC-946
143	Kristin Graham .....	RTC-950
144	Griswold, Harry .....	RTC-953
145	Gross, Michelle.....	RTC-957
146	Halvey, S.....	RTC-960
147	Hartin, Daina .....	RTC-964
148	Hering, James .....	RTC-966
149	Hintz, Edmund.....	RTC-968
150	Hoey, Jeanne and Kenway .....	RTC-971
151	Jones, Angie .....	RTC-974
152	Kantak, Neeta and Prashant .....	RTC-977

**Individuals (cont.)**

153	Kaplan, Linda .....	RTC-980
154	Keliher, Bria .....	RTC-983
155	Keller, Joseph.....	RTC-986
156	Kline, Earl .....	RTC-988
157	Kozma, Michael .....	RTC-991
158	Kutch, Bonnie .....	RTC-995
159	Laurin, Christina.....	RTC-1002
160	Lehman, Andrea.....	RTC-1006
161	Linder, Dan .....	RTC-1009
162	Lippe, Sandy .....	RTC-1012
163	Lowenhaupt, Erik.....	RTC-1014
164	Lukic, Zdravko .....	RTC-1021
165	Lutze, Alan .....	RTC-1024
166	Michalek, Mark and Meleen .....	RTC-1027
167	Morrison, Bob .....	RTC-1030
168	Mullen, Emilee.....	RTC-1033
169	Nebiker, Marion .....	RTC-1035
170	Newel, Rita.....	RTC-1037
171	Noncovich, Alain .....	RTC-1039
172	Noncovich Family.....	RTC-1043
173	Perna, John .....	RTC-1047
174	Petrie, Marlene and Tom .....	RTC-1050
175	Podhorsky, Nina.....	RTC-1053
176	Preece, Scott.....	RTC-1057
177	Radomirovic, Vladimir .....	RTC-1060
178	Ramirez, David .....	RTC-1064
179	Ramirez, Deborah.....	RTC-1068
180	Rehling, Lu .....	RTC-1085
181	Rivera, Delilah.....	RTC-1092
182	Rodolico, Katie.....	RTC-1095
183	Rodolico, Louis .....	RTC-1110
184	Rossi, Victoria Aza.....	RTC-1115
185	Rossi, Devora.....	RTC-1108
186	Rusher, Keala.....	RTC-1121
187	Sacks, Glenda .....	RTC-1123
188	Savage, Paul.....	RTC-1126
189	Shannon, Brendan.....	RTC-1129
190	Shnaidman, Mirian .....	RTC-1131
191	Smith, Jim .....	RTC-1134
192	Sted, Richard .....	RTC-1137
193	Steel, Don.....	RTC-1140
194	Suedkamp, Becky and Ed .....	RTC-1143
195	Swayze, Frank.....	RTC-1148
196	Tang, Huixian.....	RTC-1151
197	Tomic, Tatjana .....	RTC-1154
198	Voit, Diane.....	RTC-1156



**Individuals (cont.)**

I99	Walker, Kacey .....	RTC-1159
I100	Webber, Stephanie .....	RTC-1162
I101	Weigand, Robert .....	RTC-1165
I102	Wiese, Andrew.....	RTC-1168
I103	Williams, Gerald and Paulette.....	RTC-1193
I104	Wong, Alex .....	RTC-1196
I105	Wood, Rebecca Robinson .....	RTC-1198
I106	Worsham, Milo .....	RTC-1202
I107	Worsham, Susan.....	RTC-1205
I108	Wright, Julie.....	RTC-1208
I109	Zhou, Xianjin.....	RTC-1212
I110	Zibert, Chris .....	RTC-1215
I111	Ziebarth, John.....	RTC-1219
I112	Zverina, Jan and Valerie .....	RTC-1223

## **AGENCIES**

## Comment Letter A1 - California Department of Transportation

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: Blueprint SD Initiative, Hillcrest FPA, and University CPU Program EIR (SCH # 2021070359)  
**Date:** Tuesday, April 30, 2024 9:16:53 AM  
**Attachments:** [City of SD Blueprint DEIR CEQA Comment Letter - signed.pdf](#)

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**From:** Sanchez Rangel, Rogelio@DOT <[roger.sanchez-rangel@dot.ca.gov](mailto:roger.sanchez-rangel@dot.ca.gov)>  
**Sent:** Monday, April 29, 2024 10:12 AM  
**To:** Pascual, Elena <[EPascual@sandiego.gov](mailto:EPascual@sandiego.gov)>; [PLN\\_PlanningCEQA](mailto:PLN_PlanningCEQA) <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** State.Clearinghouse (State.Clearinghouse@opr.ca.gov) <[State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)>  
**Subject:** [EXTERNAL] Blueprint SD Initiative, Hillcrest FPA, and University CPU Program EIR (SCH # 2021070359)

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

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Hi Elena,

Attached please find Caltrans comment letter for the Blueprint San Diego Initiative Environmental document review.

Thank you,

[Rogelio Sanchez](#)

Associate Transportation Planner

Local Development Review | Border Studies

California Department of Transportation

[roger.sanchez-rangel@dot.ca.gov](mailto:roger.sanchez-rangel@dot.ca.gov)

Tel (619) 987-1043

A1-1

**California Department of Transportation**



DISTRICT 11  
 4050 TAYLOR STREET, MS-240  
 SAN DIEGO, CA 92110  
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April 25, 2024

11-SD-Var  
 City of San Diego Blueprint Initiative DEIR  
 SCH# 2021070359

Ms. Elena Pascual  
 City of San Diego  
 Planning Department  
 202 C Street  
 San Diego, CA 92101

Dear, Ms. Pascual:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the Blueprint SD Initiative, Hillcrest FPA, and University CPU Program Draft Environmental Impact Report (DEIR). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

A1-2

Safety is one of Caltrans’ strategic goals. Caltrans strives to make the year 2050 the first year without a death or serious injury on California’s roads. We strive for more equitable outcomes for the transportation network’s diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety of the transportation network. These pursuits are ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

A1-3

Caltrans is committed to prioritizing projects that are equitable and provide meaningful benefits to historically underserved communities, to ultimately improve transportation accessibility and quality of life for people in the communities we serve.

A1-4

**Traffic Analysis**

At the time of development, each development shall submit a VMT analysis and Local Mobility Analysis (LMA) including Multi-Modal and Safety Analysis. Proper mitigation measures for each project development shall be determined in the VMT/LMA for Multi-Modal and Safety Analysis.

A1-5



## Multimodal System Planning

Please consider incorporating further review of impacts on the State Highway System (SHS). There are several Comprehensive Multimodal Corridor Plans (CMCP's) that provide more information specific to SHS routes.

A1-6

- [South Bay to Sorrento CMCP](#): This document incorporates the areas of the University CPU and parts of the City of San Diego.
- [Central Mobility Hub and Connections](#) and [Draft Kumeyaay Corridor](#) CMCP's: These documents incorporate the City of San Diego and Hillcrest FPA related to multi-modal planning. As an example, please see the [Draft Kumeyaay Corridor Appendix E - Transportation Solutions, Cost Estimates, and Phasing Results](#), page 14 of the PDF, solution AT267, regarding multi-modal improvements to University Avenue.

Please review the [South Bay to Sorrento CMCP](#) and [SANDAG 2021 Regional Plan](#) for information on the [Purple Line, a new-proposed commuter rail service](#). The [SANDAG 2021 Regional Plan](#) also includes information about light rail improvements and the integration of California High-Speed Rail in the San Diego Region.

A1-7

Please consider the [Smart Mobility Framework 2010](#) and [California Transportation Plan 2050](#), documents: to supplement discussion of the Climate Smart Village Areas and Vehicle Miles Traveled (VMT).

A1-8

Please review the accuracy of the boundaries of the Hillcrest FPA. The draft PEIR states that the Hillcrest FPA is bounded by Park Boulevard to the west (it should state that the Hillcrest FPA is bounded by Park Boulevard to the east in relation to the other listed streets). Here are some of the sections where this information is listed:

A1-9

- Memo, pg. 3 (PDF pg. 3)
- Chapter 2.1.1.2 Hillcrest Focused Plan Amendment Area, pgs. 2-4 (PDF pg. 73)
- Chapter 3.4 Project Location, pg. 3-8 (PDF pg. 94)
- Chapter 4.1.1 Physical Setting, pg. 4.1-2 (PDF pg. 166)

## Broadband

Caltrans recognizes that teleworking and remote learning lessen traffic impacts on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of GHG and other pollutants. The availability of affordable and reliable, high-speed broadband is key in supporting travel demand management and reaching the state's transportation and climate action goals.

A1-10

**Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access, and mobility for all travelers in California and recognizes bicycle, pedestrian, and transit modes as integral elements of the transportation network.

A1-11

Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promote a complete and integrated transportation network.

A1-12

**Noise**

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, the Department of Transportation (Caltrans) is not responsible for existing or future traffic noise impacts associated with the existing configuration of I-5, I-8, I-805, SR-15, and SR-163.

A1-13

**Right of Way (R/W)**

Any work performed within Caltrans' Right-of-Way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts with the Caltrans' R/W, and any corresponding technical studies.

A1-14

If you have any questions or concerns, please contact Roger Sanchez, LDR Coordinator, at (619) 987-1043 or by e-mail sent to [roger.sanchez-rangel@dot.ca.gov](mailto:roger.sanchez-rangel@dot.ca.gov).

A1-15

Sincerely,

*Melina Pereira*

MELINA PEREIRA  
Acting Branch Chief  
Local Development Review






# City of SD Blueprint DEIR CEQA Comment Letter

Final Audit Report

2024-04-24

Created:	2024-04-24
By:	Rogelio Sanchez Rangel (s134909@dot.ca.gov)
Status:	Signed
Transaction ID:	CBJCHBCAABAAUqDWOu3sIVGYtyDlaPPG9NIF-pZg1Q4f

## "City of SD Blueprint DEIR CEQA Comment Letter" History

-  Document created by Rogelio Sanchez Rangel (s134909@dot.ca.gov)  
2024-04-24 - 9:50:08 PM GMT
-  Document emailed to Melina Pereira (melina.pereira@dot.ca.gov) for signature  
2024-04-24 - 9:52:14 PM GMT
-  Email viewed by Melina Pereira (melina.pereira@dot.ca.gov)  
2024-04-24 - 10:15:09 PM GMT
-  Document e-signed by Melina Pereira (melina.pereira@dot.ca.gov)  
Signature Date: 2024-04-24 - 10:15:22 PM GMT - Time Source: server
-  Agreement completed.  
2024-04-24 - 10:15:22 PM GMT

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**A1: Response to California Department of Transportation (Caltrans) Comment Letter**

**A1-1:** The comment is an introduction to the attached comment letter. No response is necessary.

**A1-2:** The comment is an introduction to the comment letter. No response is necessary.

**A1-3:** The comment informs the reader of Caltrans' strategic goals. No response is necessary.

**A1-4:** The comment informs the reader of Caltrans' strategic goals. No response is necessary.

**A1-5:** Comment noted. Mitigation measure TRANS-1, would apply to all future discretionary projects. In addition, all future discretionary and ministerial projects that meet certain criteria defined in the San Diego Municipal Code (SDMC) Section 143.1102 would be required to demonstrate compliance with the City's Mobility Choices Ordinance (SDMC Section 143.1103 et seq.). The requirement for a Local Mobility Analysis (LMA) and/or Vehicle Miles Traveled (VMT) analysis is defined in the City's Transportation Study Manual (TSM). The City's TSM, updated September 2022, states that all discretionary projects must complete a LMA unless they meet the trip generation screening criteria listed in the TSM under the section titled "Transportation Significance Determination: Question B." The requirement for a VMT analysis applies to all land development projects, except for those that meet at least one of the screening criteria outlined in the TSM (pages 19 – 22 and Appendix D).

**A1-6:** Comment noted. The requirement to prepare an LMA is detailed in the City's TSM, as noted above in response to comment A1-5. As part of an LMA, project specific impacts to State Highway System facilities would be conducted, if warranted. If the City LMA identifies required improvements to Caltrans facilities, those would be coordinated with the agency at that time. The Program Environmental Impact Report (PEIR) was prepared to assess potential impacts at the program-level, which generally assesses the project's impact under the CEQA significance thresholds regarding transportation policy consistency, vehicle miles travelled, hazards due to design features, and emergency access.

**A1-7:** Comment noted. As noted under Section 4.14.4 Issue 1, the project would allow for an increase in transit-supportive residential densities and nonresidential intensities in locations where existing or planned transit would be available consistent with the planned 2050 regional transportation network, which assumes implementation of the proposed Purple line and other 2050 SANDAG transportation network components. While implementation of the Purple line cannot be guaranteed at this time due to it being in the planning stages and funding not being identified, this improvement is identified in the SANDAG 2050 Regional Transportation Plan, is actively being planned, and therefore, is a reasonable assumption for a program-level planning document. As noted in the transportation analysis in Section 4.14, Issue 2(a-c), of the PEIR, the VMT generated by future development in accordance with the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA (see Tables 4.14-3, 4.14-5, and 4.14-7 in Section 4.14 of the PEIR) assume implementation of future SANDAG regional transit projects; however, the impacts related to VMT are considered significant and unavoidable in the buildout conditions because implementation of regional transit projects cannot be guaranteed.

**A1-8:** Comment noted. The City has considered these documents and no further revisions to the Final PEIR are required. The comment does not raise an issue regarding the adequacy of the PEIR.

**A1-9:** The location of Park Boulevard has been corrected in Chapter 3, Section 3.4 Project Location. The other referenced locations correctly identified Park Boulevard to the east of the Hillcrest Focused Plan Amendment (FPA) area and the Hillcrest FPA is correctly depicted and described. The comment is unclear which memo (Memo, pg. 3 (PDF pg.3) is being referenced; therefore, no revisions were made.

**A1-10:** The comment does not raise an issue regarding the adequacy of the Draft PEIR. The City acknowledges the comment regarding broadband accessibility and its impact on travel demand management and in reaching the state's transportation and climate action goals. Broadband accessibility is noted in the City's Climate Action Plan, with which this project is consistent.

**A1-11:** The comment does not raise an issue regarding the adequacy of the Draft PEIR. The comment informs the reader of Caltrans' recognition of bicycle, pedestrian, and transit modes as integral elements of the transportation network. No response is necessary.

**A1-12:** The comment does not raise an issue regarding the adequacy of the Draft PEIR. No response is necessary.

**A1-13:** Comment noted.

**A1-14:** Comment noted. Section 4.14.2.1(b) includes acknowledgement of future projects that may physically affect Caltrans facilities, Caltrans requires encroachment permits before any construction work may be undertaken.

**A1-15:** The comment is a conclusion to the attached comment letter. No response is necessary.



## Comment Letter A2 - California Department of Fish and Wildlife

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: Draft Program Environmental Impact Report- Blueprint Sd Initiative, Hillcrest FPA and University CPU Program; SCH#2021070359  
**Date:** Tuesday, May 7, 2024 8:21:36 AM  
**Attachments:** [Outlook-y5nwe03s.png](#)  
[20240503\\_2021070359\\_DPEIR CiSD BlueprintSD.pdf](#)

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**From:** Diaz-Barriga, Frida@Wildlife <Frida.Diaz-Barriga@Wildlife.ca.gov>  
**Sent:** Friday, May 3, 2024 1:40 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Tang, Victoria@Wildlife <Victoria.Tang@wildlife.ca.gov>; Burlaza, Melanie@Wildlife <Melanie.Burlaza@Wildlife.ca.gov>; Turner, Jennifer@Wildlife <Jennifer.Turner@wildlife.ca.gov>; Gibson, Steve@Wildlife <Steve.Gibson@wildlife.ca.gov>; Rieman, Frederic@Wildlife <Frederic.Rieman@Wildlife.ca.gov>; Schmalbach, Heather@Wildlife <Heather.Schmalbach@Wildlife.ca.gov>; Hailey, Cindy@Wildlife <Cindy.Hailey@wildlife.ca.gov>; Kalinowski, Alison (Ali)@Wildlife <Alison.Kalinowski@Wildlife.ca.gov>; OPR State Clearinghouse <state.clearinghouse@opr.ca.gov>; Snyder, Jonathan <jonathan\_d\_snyder@fws.gov>  
**Subject:** [EXTERNAL] Draft Program Environmental Impact Report- Blueprint Sd Initiative, Hillcrest FPA and University CPU Program; SCH#2021070359

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

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Hello Elena,

Please see the attached document for your records. If you have any questions, please direct them to Alison Kalinowski at (858) 775-6320 or at [Alison.Kalinowski@wildlife.ca.gov](mailto:Alison.Kalinowski@wildlife.ca.gov).

A2-1

Thank you,  
Frida

Frida Diaz (She/Her) | Staff Services Analyst



California Department of  
**Fish and Wildlife**

### South Coast Region 5

3030 Old Ranch Parkway, Suite 400

Seal Beach, CA 90740

**Work Cell** 858-203-5876

**Office** (858) 467-2702



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
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**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



May 3, 2024

Elena Pascual  
City of San Diego  
202 C Street  
San Diego, CA 92101  
[PlanningCEQA@sandiego.gov](mailto:PlanningCEQA@sandiego.gov)

**SUBJECT: BLUEPRINT SD INITIATIVE, HILLCREST FPA, AND UNIVERSITY CPU PROGRAM, DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SCH#2021070359; SAN DIEGO COUNTY, CA**

Dear Elena Pascual:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a Draft Program Environmental Impact Report (DPEIR) from the City of San Diego (City) for the Blueprint San Diego (SD) Initiative, Hillcrest Focused Plan Amendment (FPA), and University Community Plan Update (CPU) (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.<sup>1</sup>

A2-2

Thank you for the opportunity to provide comments and recommendations regarding the activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW Role**

CDFW is California’s **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State [Fish & G. Code, §§ 711.7, subdivision (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines, § 15386, subdivision (a)]. CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (Id., § 1802). Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect state fish and wildlife resources.

A2-3

<sup>1</sup> CEQA is codified in the California Public Resources Code in section 21000 et seq. The “CEQA Guidelines” are found in Title 14 of the California Code of Regulations, commencing with section 15000.

*Conserving California’s Wildlife Since 1870*

Elena Pascual  
City of San Diego  
May 3, 2024  
Page 2 of 22

CDFW is also submitting comments as a **Responsible Agency** under CEQA (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in “take” (see Fish & G. Code, § 2050) of any species protected under the California Endangered Species Act (CESA; Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

A2-3 cont.

CDFW also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City participates in the NCCP by implementation of its approved Subarea Plan (SAP) and Implementation Agreement (IA) under the subregional Multiple Species Conservation Program (MSCP). The City’s Multi-Habitat Planning Area (MHPA) delineates core biological resource areas and corridors targeted for conservation under the SAP.

## PROJECT DESCRIPTION SUMMARY

**Proponent:** City of San Diego

**Objective:** In 2008, the City adopted a General Plan to provide policy guidance on long-term development based on several elements including land use and community planning, mobility, economic prosperity, public facilities, services and safety, urban design, recreation, historic preservation, conservation, noise, and housing. Currently, the City implements 48 different Community Plans that tier off from the General Plan’s Land Use and Community Planning Element and provide community-specific policies and land use designation maps.

The Project proposes to amend the General Plan through adoption of the Blueprint SD Initiative, which will update the City’s land use planning framework and policies to ensure projected development is consistent with the housing, climate, and mobility goals outlined in the City’s 2022 Climate Action Plan (CAP) and San Diego Association of Governments’ (SANDAG) 2021 Transportation Plan. Under Blueprint SD, future land use changes would be implemented through Community Plan Updates (CPU), Specific Plans, and Focused Plan Amendments (FPA), with the goal of focusing development of mixed-use “Climate Smart Village” areas near transit and recreational areas to support community sustainability, mobility, and quality of life.

A2-4

The Project also proposes immediate updates to the University CPU and Hillcrest FPA within the Uptown Community Plan that incorporate amendments to the City’s Land Development Code (LDC) and zoning designations. The Project may include future MSCP Boundary Line Corrections (BLCs) to address MSCP mapping errors (e.g.

Elena Pascual  
City of San Diego  
May 3, 2024  
Page 3 of 22

removing pre-SAP development). The Project may also include Boundary Line Adjustments (BLAs) to remove the MHPA designation over lands to allow additional development encroachment (more than 25 percent of the parcel) in certain areas in exchange for additional conservation areas added elsewhere contingent on the exchange yielding an equal or greater biological value. The Project specifically proposes a BLC within the University CPU to add 25.97 acres of City-owned land into the MHPA (25 percent developable, 75 percent conserved) in areas along Nobel Drive and Sorrento Valley Road. In addition, the City will also vacate 2.70 acres of City-owned right-of-way traversing Rose Canyon that will change from 75 percent conserved designation to 100 percent conserved MHPA. The DPEIR Mitigation Measure (MM) BIO-1 stipulates that “any future projects that could directly and/or indirectly impact sensitive species, sensitive habitats and/or wetlands shall comply with the City’s Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans including, but not limited to, the City’s [SAP] and Vernal Pool Habitat Conservation Plan (VPHCP) and shall implement avoidance, minimization, and mitigation measures in accordance with the City’s ESL Regulations, Biology Guidelines, and [SAP] and VPHCP” (DPEIR page 4.3-64).

A2-4  
cont.

**Location:** The City of San Diego covers approximately 372 square miles in the southwest corner of California. It is bound to the west by the Pacific Ocean, and to the east and south by the cities of Santee, La Mesa, and Lemon Grove, unincorporated County of San Diego lands, and National City. The Project area is bound to the north by the cities of Del Mar, Solana Beach, Escondido, and Poway, and unincorporated County of San Diego lands.

University City encompasses approximately 8,676 acres in the north-central area of the City, classified as the ‘Northern Area’ and ‘Urban Area’ in the SAP. It is bound to the south by State Route 52 and is crisscrossed by Interstate 5 and Interstate 805. It is bound to the east by the community of Mira Mesa and Marine Corps Air Station Miramar and to the west by the Pacific Ocean and the community of La Jolla. This area currently supports a mix of educational, commercial, and industrial facilities, residential development, urban parks, and open space/MHPA lands including portions of Rose Canyon, Torrey Canyon, Carroll Canyon, Sorrento Canyon, and Miramar Canyon.

A2-5

The Hillcrest FPA is nested within the Uptown community and is located just north of downtown San Diego and covers approximately 380 acres. It is bound to the north by Interstate 8, east by Park Boulevard and Balboa Park, and to the west and south by Old Town San Diego and Interstate 5.

**Biological Setting:** Per the DPEIR, thirty-one vegetation communities and land cover types are present throughout the City (DPEIR; Table 4.3-1; Attachment A). Vegetation communities and land cover types were classified following Holland (1986) as modified by Oberbauer et al. (Oberbauer et al. 2008). Per the DPEIR, there are 12 special status plant species known to occur within the Project area, with seven species reported within the City’s proposed Climate Smart Village Areas (DPEIR; Table 4.3-2; Attachment B). In

A2-6

Elena Pascual  
City of San Diego  
May 3, 2024  
Page 4 of 22

addition, there are 12 special status wildlife species known to occur within the Project area, with 11 of those species reported within the City’s proposed Climate Smart Village Areas (DPEIR; Table 4.3-3; Attachment C). Four of the wildlife species are sensitive nesting birds including California least tern (*Sternula anatillarum browni*; CESA and Endangered Species Act (ESA)-listed endangered, California Fully Protected Species), coastal California gnatcatcher (*Polioptila californica californica*; ESA-listed threatened, California Species of Special Concern (SSC)), least Bell’s vireo (*Vireo bellii pusillus*; CESA-listed endangered, ESA-listed endangered; vireo), and American peregrine falcon (*Falco peregrinus anatum*). One species, Crotch’s bumble bee (*Bombus crotchii*), was left off the list in the DPEIR of species that have occurred or are likely occur within the City limits. Crotch’s bumble bee is currently a candidate for listing under CESA; therefore, future projects under the DPEIR will need to address all potential impacts to the species (CDFW 2024a).

A2-6  
cont.

**Project History:** CDFW previously provided comments on the Notice of Preparation for the Blueprint SD Initiative component of the Project in a letter dated August 18, 2021.

## COMMENTS AND RECOMMENDATIONS

The DPEIR provides a foundation for second tier CEQA documents for subsequent projects but does not analyze the project-specific impacts of individual projects. These analyses will be performed on individual project sites as construction of each project is needed. CDFW offers the following comments and recommendations to assist the City in adequately identifying and/or mitigating the Project’s significant, or potentially significant, direct, and indirect impacts on fish and wildlife (biological) resources, and to ensure regional conservation objectives in the City’s SAP and VPHCP would not be eliminated by implementation of the Project. Furthermore, CDFW recommends the City provide Biological Resources Mitigation Measures for the Project and condition the environmental document to include the mitigation measures recommended in this letter. CDFW has provided the City with a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation and Monitoring Reporting Plan (Attachment D).

A2-7

### COMMENT #1: Proposed Amendments to Land Development Code (LDC)

**Issue:** Section 3.5.1.3 of the DPEIR states that “future LDC amendments may include, but not be limited to, the following: amendments to facilitate ministerial processing of residential and mixed-use development...and changes to support development and mobility improvements” (DPEIR page 3-26). CDFW and City staff (Dan Monroe, Senior Planner) discussed this item briefly in the field on April 23, 2024, and the City relayed that these amendments will likely involve rezoning of

A2-8



Elena Pascual  
City of San Diego  
May 3, 2024  
Page 5 of 22

land use designations and that an amended LDC document has not yet been prepared or included in the DPEIR.

**Specific Impact:** Proposed amendments to the City’s LDC may result in changes to the City’s standards for determination of impact and mitigation under CEQA and implementation of their SAP.

**Why impact would occur:** There is insufficient detail provided in the DPEIR for CDFW to determine if proposed amendments to the LDC will be consistent with the conservation measures provided in the SAP, IA, and NCCP Permit (CDFW 1997).

**Evidence that impact would be significant:** The City has an approved and permitted NCCP that they implement in partnership with CDFW. As the permitting entity, CDFW has a compelling interest in reviewing any changes to the City’s implementation framework such as the LDC. Any amendments to the LDC inconsistent with the SAP may result in noncompliance with the NCCP Permit.

A2-8 cont.

#### **Recommended Potentially Feasible Mitigation Measure(s)**

**Recommendation #1 CDFW Review of Future Amendments to the LDC:** All proposed amendments to the LDC shall be consistent with the City’s SAP, IA, and NCCP Permit. CDFW would appreciate the opportunity to review and comment on any proposed amendments to the LDC to ensure consistency with the SAP.

#### **COMMENT #2: Impacts to Crotch’s Bumble Bee**

**Issue:** Future projects associated with the DPEIR may impact suitable habitat for Crotch’s bumble bee (*Bombus crotchii*), a candidate species for CESA listing that is not covered under the SAP. The DPEIR or the Biological Technical Report does not discuss or provide mitigation measures to reduce the Project’s impacts to Crotch’s bumble bee.

**Specific impact:** Future projects may result in temporal or permanent loss of suitable nesting and foraging habitat of Crotch’s bumble bee. Project ground-disturbing activities may cause death or injury of adults, eggs, and larva; burrow collapse; nest abandonment; and reduced nest success.

A2-9

**Why impact would occur:** According to the [California Natural Diversity Database](#), observations of Crotch’s bumble bee have been recorded within the City (CDFW 2024b). Additionally, [iNaturalist](#) has recent recorded observations of Crotch’s bumble bee within the City (iNaturalist 2024). As with any flying species, Crotch’s bumble bee may utilize areas that have suitable nesting habitat and floral resources

Elena Pascual  
City of San Diego  
May 3, 2024  
Page 6 of 22

throughout the City. The BTR identifies vegetation throughout the Project site that has the potential to provide suitable nesting, overwintering, and foraging habitat for this species. Crotch's bumble bee primarily nest underground in late February through late October in abandoned small mammal burrows but may also nest under perennial bunch grasses or thatched annual grasses, under-brush piles, in old bird nests, and in dead trees or hollow logs (Williams et al. 2014; Hatfield et al. 2018). Overwintering sites utilized by Crotch's bumble bee mated queens include soft, disturbed soil (Goulson 2010), or under leaf litter or other debris (Williams et al. 2014). Foraging habitat for Crotch's bumble bee includes both native and non-native floral resources in a variety of vegetation types within approximately 0.5 km of a nest. Ground disturbance and vegetation removal associated with Project implementation during the breeding season could result in the incidental loss of breeding success or otherwise lead to nest abandonment in areas adjacent to the Project site. The BTR and DPEIR does not discuss the Project's impact on Crotch's bumble bee. Furthermore, the DPEIR does not provide specific avoidance and minimization measures directly related to Crotch's bumble bee. Without sufficient species-specific avoidance, minimization, or mitigation measures impacts to Crotch's bumble bee may occur.

**Evidence impact would be significant:** Impacts to CESA-listed species and their habitat meet the definition of endangered, rare, or threatened under CEQA (CEQA Guidelines § 15380). Impacts to CESA listed species and their habitats may result in a mandatory finding of significance because the Project has the potential to substantially reduce the number or restrict the range of an endangered, rare, or threatened species (CEQA Guidelines § 15065).

A2-9 cont.

The California Fish and Game Commission accepted a petition to list the Crotch's bumble bee as endangered under CESA (Fish & G. Code, § 2050 et seq.), determining the listing "may be warranted" and advancing the species to the candidacy stage of the CESA listing process. The Project may substantially reduce and adversely modify habitat as well as reduce and potentially impair the viability of populations of Crotch's bumble bee. The Project may also reduce the number and range of the species without considering the likelihood that special status species on adjacent and nearby natural lands may rely upon the habitat that occurs on the proposed Project site. In addition, Crotch's bumble bee has a State ranking of S1/S2. This means that the Crotch's bumble bee is considered critically imperiled or imperiled and is extremely rare (often 5 or fewer populations). Lastly, Crotch's bumble bee is listed as an invertebrate of conservation priority under the [California Terrestrial and Vernal Pool Invertebrates of Conservation Priority](#) (CDFW 2017).

### **Recommended Potentially Feasible Mitigation Measure(s)**

**Mitigation Measure #1: Crotch's Bumble Bee Surveys** - Within one year prior to vegetation removal and/or grading, a qualified entomologist with appropriate handling permits and who is familiar with the species behavior and life history, shall

Elena Pascual  
City of San Diego  
May 3, 2024  
Page 7 of 22

conduct focused surveys to determine the presence/absence of Crotch's bumble bee within and adjacent to a proposed project site. Focused surveys shall follow CDFW's [Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species](#) (CDFW 2023) or the latest guidance from CDFW. Focused surveys shall also be conducted throughout the entire project site during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing project-related ground-disturbing activities. At minimum, a survey report shall provide the following:

- 1) a description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee;
- 2) field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched;
- 3) map(s) showing the location of observations and any nests/colonies; and
- 4) a description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).

A2-9 cont.

**Mitigation Measure #2: Avoidance Plan** - If Crotch's bumble bee is detected, the applicant in consultation with a qualified entomologist shall develop a plan to fully avoid impacts to Crotch's bumble bee, if feasible. The plan shall include effective, specific, and enforceable measures. An avoidance plan shall be submitted to the CDFW and City for approval prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch's bumble bee.

**Mitigation Measure #3: Incidental Take Permit** - If Crotch's bumble bee is detected and if impacts to Crotch's bumble bee cannot be feasibly avoided, the Project applicant shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish & G. Code, § 2080 et seq.). The Project applicant shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project applicant shall provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.

Elena Pascual  
City of San Diego  
May 3, 2024  
Page 8 of 22

### Additional Comments

1. Trails Proposed within Multi-Habitat Planning Area (MHPA) Lands. The DPEIR depicts several proposed trails within and adjacent to MHPA lands (DPEIR Figures 3-15 and 3-26).

**Recommendation #2 Proposed Trails:** Although CDFW acknowledges that trails are allowed within and adjacent to the MHPA lands consistent with Section 1.5.2 of the City's SAP, we strongly recommend that proposed trails are not pre-emptively depicted in the DPEIR given the programmatic nature of the document. Prior to implementation of any trail projects, CDFW would appreciate the opportunity to evaluate site-specific species and habitat information to analyze biological impacts and determine if the proposed trails and consequent recreational activity are consistent with the MSCP.

A2-10

To facilitate our review of proposed trails, CDFW recommends that the following information be provided as subsequent trail projects move forward: an aerial photograph with an overlay of the proposed alignment of the trail in relation to any designated or proposed open space, specifications of trail design, measures to avoid/minimize impacts related to users straying off-trail or trail use by unauthorized vehicles such as electric bicycles, responsibility entity and activities related to maintenance, and a discussion of how the proposed location and use of the trail would be consistent with the SAP.

2. Multi-Habitat Planning Area (MHPA) Boundary Line Adjustments (BLA). CDFW recommends that the City consult with the Wildlife Agencies early on to review any future proposed BLA under the Project.

**Recommendation #3 Wildlife Agencies' Concurrence on Boundary Line Adjustments:** To ensure consistency with the MSCP's conservation goals and objectives, future projects under the DPEIR should provide full disclosure and functional equivalency analysis of any proposed BLA per Sections 1.1.1 and 5.42 of the MSCP SAP (City of San Diego 1997). The Wildlife Agencies will need to agree and provide written concurrence for the requested BLA after we have had the opportunity to review all information provided by the City. When evaluating a proposed BLA and habitat equivalency assessment, the Wildlife Agencies generally consider the following biological goals:

A2-11

- No net loss of MHPA acreage;
- No net reduction of higher sensitivity vegetation communities (i.e., Tier I, II, IIIa and IIIb);
- Net impacts/conservation of covered listed species resulting from the BLA;
- Net impacts/conservation of covered non-listed sensitive species resulting from the BLA; and

Elena Pascual  
City of San Diego  
May 3, 2024  
Page 9 of 22

- Landscape configuration to maintain connectivity of the MHPA (i.e., net effects to 'Preserve Design')

A2-11  
cont.

3. Lake and Streambed: Future projects may impact local lakes, rivers, or streams within the City of San Diego. CDFW has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of a LSAA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency.

A2-12

**Recommendation #4 Fish and Game Code 1600 Notification:** To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the DPEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSAA. CDFW recommends the Applicant submit a Lake and Streambed Alteration Notification to CDFW. Notifications can be submitted through CDFW's Environmental Permit Information Management System (EPIMS), which can be found at [Environmental Permit Information Management System \(ca.gov\)](https://www.cdpr.ca.gov/Environmental-Permit-Information-Management-System) (CDFW 2024c).

## ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Submitting-Data> (CDFW 2024d). The completed form can be mailed electronically to CNDDDB at the following email address: [CNDDDB@wildlife.ca.gov](mailto:CNDDDB@wildlife.ca.gov). The types of information reported to CNDDDB can be found at the following link: <https://wildlife.ca.gov/Data/CNDDDB/Plants-and-Animals> (CDFW2024e).

A2-13

## ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be

A2-14

Elena Pascual  
City of San Diego  
May 3, 2024  
Page 10 of 22

operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

A2-14 cont.


## CONCLUSION

CDFW appreciates the opportunity to comment on the DPEIR to assist the City of San Diego in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the Lead Agency has to our comments and to receive notification of any forthcoming hearing date(s) for the Project [CEQA Guidelines, § 15073(e)].

A2-15

Questions regarding this letter or further coordination should be directed to Alison Kalinowski, Environmental Scientist, at [Alison.Kalinowski@wildlife.ca.gov](mailto:Alison.Kalinowski@wildlife.ca.gov) or (858) 775-6320.

Sincerely,

DocuSigned by:  
  
5991E19EF8094C3...

Victoria Tang  
Environmental Program Manager  
South Coast Region

ec: California Department of Fish and Wildlife  
Melanie Burlaza, Senior Environmental Scientist (Supervisory)  
Jennifer Turner, Senior Environmental Scientist (Supervisory)  
Steve Gibson, Senior Environmental Scientist (Supervisory)  
Frederic (Fritz) Rieman, Senior Environmental Scientist (Supervisory)  
Heather Schmalbach, Senior Environmental Scientist (Specialist)  
Cindy Hailey, Staff Services Analyst

Office of Planning and Research  
State Clearinghouse, Sacramento – [State.Clearinghouse@opr.ca.gov](mailto:State.Clearinghouse@opr.ca.gov)

United States Fish and Wildlife Service  
Jonathan Snyder – [Jonathan\\_d\\_Snyder@fws.gov](mailto:Jonathan_d_Snyder@fws.gov)



Elena Pascual  
City of San Diego  
May 3, 2024  
Page 11 of 22

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Elena Pascual  
City of San Diego  
May 3, 2024  
Page 12 of 22

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**Attachments:**

**Attachment A. Vegetation Communities and Land Cover Types**

**A2-16**

Elena Pascual  
 City of San Diego  
 May 3, 2024  
 Page 13 of 22

Table 4.3-1 Vegetation Communities and Land Cover Types			
	Acres		
	Blueprint SD Initiative Climate Smart Village Areas	Hillcrest FPA Area	University CPU Area
<b>Upland Vegetation Communities</b>			
Diegan Coastal Sage Scrub	454	4	596
Non-Native Grassland	<1	0	111
Chaparral/ Southern Mixed Chaparral	255	4	354
Chamise Chaparral	0	0	45
Maritime Succulent Scrub	0	0	446
Scrub Oak Chaparral	0	0	7
Southern Coastal Bluff Scrub	0	0	98
Southern Maritime Chaparral	0	0	255
Torrey Pines Forest	0	0	105
Valley and Foothill Grassland/ Valley Needlegrass Grassland	143	1	509
<b>Total Uplands</b>	<b>853</b>	<b>9</b>	<b>2,527</b>
	Acres		
	Blueprint SD Initiative Climate Smart Village Areas	Hillcrest FPA Area	University CPU Area
<b>Wetland Vegetation Communities</b>			
Disturbed Wetland	8	0	3
Southern Coastal Salt Marsh	12	0	13
Coastal and Valley Freshwater Marsh	24	0	<1
Freshwater Seep	0	0	1
Southern Riparian Forest	2	0	18
Southern Coast Live Oak Riparian Forest	0	0	7
Southern Cottonwood-Willow Riparian Forest	78	0	0
Southern Sycamore-Alder Riparian Woodland	12	0	89
Southern Riparian Scrub	66	0	57
Southern Willow Scrub	0	0	<1
Subtidal	6	0	4
Shallow Bay	7	0	0
Estuarine	6	0	0
Freshwater	80	0	0
Vernal Pools	0	0	1 <sup>1</sup>
Non-Vegetated Channel or Floodway	3	0	1
Beach	28	0	44
<b>Total Wetlands</b>	<b>331</b>	<b>0</b>	<b>236</b>
	Acres		
	Blueprint SD Initiative Climate Smart Village Areas	Hillcrest FPA Area	University CPU Area
<b>Disturbed/Developed Land Cover Types</b>			
Disturbed Land	456	6	367
Urban/Developed	23,239	366	5,451
Agriculture	16	0	0
Eucalyptus Woodland	15	<1	95
<b>Total Disturbed/ Developed Land Cover Type</b>	<b>23,726</b>	<b>380</b>	<b>5,913</b>
Notes:			
Acreages are approximate based on generalized data and may not add due to rounding. Focused surveys would be required to verify resources.			
<sup>1</sup> Vernal pool acreages are estimates. Locations of vernal pool resources within the University CPU area are depicted in more detail on Figures 7a and 7b of Appendix D.			

A2-16 cont.

Elena Pascual  
 City of San Diego  
 May 3, 2024  
 Page 14 of 22

Table 4.3-2 Sensitive Plant Species that Occur or have a Potential to Occur within the Project Areas <sup>1</sup>				
Species	Sensitivity	Description	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
San Diego button-celery ( <i>Eryngium aristulatum</i> var. <i>parishii</i> )	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Biennial/perennial herb; vernal pools, mesic areas of coastal sage scrub and grasslands, blooms April-June; elevation less than 2,000 feet. Known from San Diego and Riverside counties. Additional populations occur in Baja California, Mexico.	<b>Present.</b> Known from 49 locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
California Orcutt grass ( <i>Orcuttia californica</i> )	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools; blooms April-August; elevation 50–2,200 feet.	<b>Potential.</b> No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Salt marsh bird's beak ( <i>Chloropyron maritimum</i> ssp. <i>Maritimum</i> [= <i>Cordylanthus maritimus</i> ssp. <i>Maritimus</i> ])	FE SE CRPR 1B.2 City of San Diego MSCP	Annual herb (hemiparasitic); coastal dunes, coastal salt marshes and swamps; blooms May–October; elevation less than 100 feet.	<b>Present.</b> Known from 5 locations in La Jolla (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Spreading navarretia ( <i>Navarretia fossalis</i> )	FT CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools, marshes and swamps, chenopod scrub; blooms April–June; elevation 100–4,300 feet.	<b>Potential.</b> No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Thread-leaved brodiaea ( <i>Brodiaea filifolia</i> )	FT SE CRPR 1B.1 City of San Diego NE, MSCP	Perennial herb (bulbiferous); cismontane woodland, coastal sage scrub, playas, valley and foothill grassland, vernal pools; often clay soils; blooms March–June; elevation less than 2,850–3,675 feet. California endemic. Known from San Diego, Riverside, Orange, Los Angeles, and San Bernardino counties.	<b>Potential.</b> No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.

Table 4.3-2 Sensitive Plant Species that Occur or have a Potential to Occur within the Project Areas <sup>1</sup>				
Species	Sensitivity	Description	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
Orcutt's spineflower ( <i>Charizantha orcuttiana</i> )	FE SE CRPR 1B.1	Annual herb; maritime chaparral, closed-cone coniferous forest, coastal sage scrub; sandy openings; blooms March–May; elevation less than 400 feet. San Diego County endemic. Known from fewer than 20 occurrences.	<b>Present.</b> Known from 20 locations in La Jolla and Point Loma (CDFW 2024).	<b>Potential.</b> Although no historical records occur (CDFW 2024), this species has potential to occur within suitable coastal sage scrub habitat along the canyon in the northern corner of the Hillcrest FPA Area.
Willow monardella ( <i>Monardella viminea</i> [= <i>Monardella linoides</i> ])	FE SE CNPS 1B.1 City of San Diego MSCP	Perennial herb; closed-cone coniferous forest, chaparral, coastal sage scrub, riparian scrub, riparian woodlands, sandy seasonal dry washes; blooms June–August; elevation 160–740 feet. San Diego County endemic.	<b>Present.</b> Known from 66 locations throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
San Diego mesa mint ( <i>Pogogyne abramsii</i> )	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools; blooms March–July; elevation 300–700 feet. San Diego County endemic.	<b>Present.</b> Known from 208 locations throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Otay mesa mint ( <i>Pogogyne nudiuscula</i> )	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools; blooms May–July; elevation 300–820 feet. In California, known from approximately 10 occurrences in Otay Mesa in San Diego County. Additional populations occur in Baja California, Mexico.	<b>Present.</b> Known from 77 locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
San Diego thornmint ( <i>Acanthomintha ilicifolia</i> )	FT SE CRPR 1B.1 City of San Diego NE, MSCP	Annual herb; chaparral, coastal sage scrub, and grasslands; friable or broken clay soils; blooms April–June; elevation less than 3,200 feet.	<b>Present.</b> Known from 60 locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> One historical record occurs from 1936 (CDFW 2024); however, this species is possibly extirpated.
Del Mar manzanita ( <i>Arctostaphylos glandulosa</i> ssp. <i>Crossifolia</i> )	FE CRPR 1B.1 City of San Diego MSCP	Perennial evergreen shrub; southern maritime chaparral; sandy soil; blooms December–June; elevation less than 1,200 feet.	<b>Potential.</b> No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.

A2-17  
cont.

Elena Pascual  
 City of San Diego  
 May 3, 2024  
 Page 15 of 22

Table 4.3-2 Sensitive Plant Species that Occur or have a Potential to Occur within the Project Areas <sup>1</sup>				
Species	Sensitivity	Description	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
Variegated dudleya ( <i>Dudleya variegata</i> )	CRPR 1B.2 City of San Diego NE, MSCP	Perennial herb; openings in chaparral, coastal sage scrub, grasslands, vernal pools; blooms April-June; elevation less than 1,900 feet.	<b>Present.</b> Known from 106 locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Potential.</b> One historical record occurs from 1936 (CDFW 2024) and this species has potential to occur in openings in coastal sage scrub and chaparral along the canyons in the northwestern corner of the Hillcrest FPA Area.

<sup>1</sup> Refer to Appendix D for detail on the sensitive plant species that occur or have a potential to occur within the University CPU area.

SOURCES: Jepson Flora Project 2022; CDFW 2024; Calflora 2023; NatureServe 2023

**STATUS CODES**

Federal Status  
 FE = Listed as endangered by the federal government  
 FT = Listed as threatened by the federal government

State Status  
 SE = Listed as endangered by the state of California

California Native Plant Society (CNPS): California Rare Plant Ranks (CRPR)  
 1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.  
 0.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat).  
 0.2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat).

City of San Diego  
 MSCP = City of San Diego MSCP Subarea Plan covered species.  
 NE = Narrow Endemic species that have limited distributions in the region and require focused evaluations during project review.  
 VPHCP = City of San Diego Vernal Pool Habitat Conservation Plan covered species.

A2-17  
cont.

**Attachment C. Sensitive Wildlife Species Within Project Area**

A2-18



Elena Pascual  
 City of San Diego  
 May 3, 2024  
 Page 16 of 22

Table 4.3-3 Sensitive Wildlife Species with a Potential to Occur within the Project Areas				
Species	Sensitivity	Habitat	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
<i>Invertebrates</i>				
Quino checkerspot butterfly ( <i>Euphydryas editha quino</i> )	FE	Open, dry areas in foothills, mesas, lake margins. Larval host plant <i>Plantago erecta</i> . Adult emergence mid-January through April.	<b>Present.</b> Known from 74 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Riverside fairy shrimp ( <i>Streptocephalus woottoni</i> )	FE City of San Diego VPHCP	Vernal pools.	<b>Present.</b> Known from 55 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
San Diego fairy shrimp ( <i>Branchinecta sandiegonensis</i> )	FE City of San Diego VPHCP	Vernal pools.	<b>Present.</b> Known from 783 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
<i>Amphibians</i>				
Western spadefoot ( <i>Spea hammondi</i> )	FPT SSC	Vernal pools, floodplains, and alkali flats within areas of open vegetation.	<b>Present.</b> Known from 464 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> Although 1 historical record occurs for this species in 1946 (CDFW 2024), much of this species' natural habitat has been destroyed due to development and no suitable habitat is present within the Hillcrest FPA Area.
Arroyo toad ( <i>Anaxyrus californicus</i> [= <i>Bufo microscaphus californicus</i> ])	FE SSC City of San Diego MSCP	Open streamside sand/gravel flats. Quiet, shallow pools along stream edges are breeding habitat. Nocturnal except during breeding season (March-July).	<b>Present.</b> Known from 94 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
<i>Reptiles</i>				
Southwestern pond turtle ( <i>Emys marmorata</i> )	SSC MSCP	Ponds, small lakes, marshes, slow-moving, sometimes brackish water.	<b>Potential.</b> Suitable ponds, small lakes and marshes with slow-moving water habitats are present throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.

A2-18  
cont.

Elena Pascual  
 City of San Diego  
 May 3, 2024  
 Page 17 of 22

Table 4.3-3 Sensitive Wildlife Species with a Potential to Occur within the Project Areas				
Species	Sensitivity	Habitat	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
San Diegan legless lizard ( <i>Anniella stebbinsi</i> [= <i>Anniella pulchra</i> ])	SSC	Herbaceous layers with loose soil in coastal scrub, chaparral, and open riparian. Prefers dunes and sandy washes near moist soil.	<b>Present.</b> Known from 385 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Potential.</b> Known from 1 historical location in 1976 (CDFW 2024) and suitable coastal scrub and chaparral habitat occurs in the northwestern corner of the Hillcrest FPA Area.
California glossy snake ( <i>Arizona elegans occidentalis</i> )	SSC	Scrub and grassland habitats, often with loose or sandy soils.	<b>Present.</b> Known from 184 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Potential.</b> Known from 1 historical location in 1942 (CDFW 2024) and marginally suitable scrub habitat occurs in the northwestern corner of the Hillcrest FPA Area.
<i>Birds</i>				
American peregrine falcon ( <i>Falco peregrinus anatum</i> )	City of San Diego MSCP	Open coastal areas, mud flats. Rare inland. Rare fall and winter resident, casual in late spring and early summer. Local breeding populations extirpated.	<b>Present.</b> Known from 278 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> Known from 1 historical location in 1990 (CDFW 2024); however, no suitable habitat is present.
California least tern ( <i>Sternula</i> [= <i>Sterna</i> ] <i>antillarum browni</i> )	FE SC, CFP City of San Diego MSCP	Bays, estuaries, lagoons, shoreline. Resident. Localized breeding.	<b>Present.</b> Known from 32 historical locations in Point Loma and La Jolla (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Coastal California gnatcatcher ( <i>Polioptila californica californica</i> )	FT SSC City of San Diego MSCP	Coastal sage scrub, maritime succulent scrub. Resident.	<b>Present.</b> Known from 1,648 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Potential.</b> No historical records occur (CDFW 2024); however, suitable Diegan coastal sage scrub is present along the northern site boundary.
Least Bell's vireo ( <i>Vireo bellii pusillus</i> )	FE SE City of San Diego MSCP	Willow riparian woodlands. Summer resident.	<b>Present.</b> Known from 820 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> Although 1 historic record occurs from 1921 (CDFW 2024), much of this species' natural habitat has been destroyed due to development and no suitable habitat is present within the Hillcrest FPA Area.

A2-18  
cont.

Elena Pascual  
 City of San Diego  
 May 3, 2024  
 Page 18 of 22

**Attachment D. Draft Mitigation and Monitoring Reporting Plan**

<b>Biological Resources (BIO)</b>			
<b>Mitigation Measure (MM) or Recommendation (REC)</b>		<b>Timing</b>	<b>Responsible Party</b>
<b>Recommendation #1 CDFW Review of Future Amendments to the LDC</b>	All proposed amendments to the LDC shall be consistent with the City’s SAP, IA, and NCCP Permit. CDFW would appreciate the opportunity to review and comment on any proposed amendments to the LDC to ensure consistency with the SAP.	Prior to City approval of amendments to the LDC	City
<b>MM-BIO-1-Crotch’s Bumble Bee Surveys</b>	Within one year prior to vegetation removal and/or grading, a qualified entomologist with appropriate handling permits and who is familiar with the species behavior and life history, shall conduct focused surveys to determine the presence/absence of Crotch’s bumble bee within and adjacent to a proposed project site. Focused surveys shall follow CDFW’s <a href="#">Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species</a> (CDFW 2023). Focused surveys shall also be conducted throughout the entire project site during the appropriate flying season to ensure no missed detection of Crotch’s bumble bee occurs. Survey results, including negative findings, shall be submitted to CDFW and the City prior to implementing project-related ground-disturbing activities. At minimum, a survey report shall provide the following:	Prior to vegetation removal and ground-disturbing activities	Project Applicant/Qualified Entomologist

A2-19

Elena Pascual  
 City of San Diego  
 May 3, 2024  
 Page 19 of 22

	<ol style="list-style-type: none"> <li>5) a description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch’s bumble bee;</li> <li>6) field survey conditions that shall include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched;</li> <li>7) map(s) showing the location of observations and any nests/colonies; and,</li> <li>8) a description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, shall include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species).</li> </ol>		
<p><b>MM-BIO-2-Avoidance Plan</b></p>	<p>If Crotch’s bumble bee is detected, the applicant in consultation with a qualified entomologist shall develop a plan to fully avoid impacts to Crotch’s bumble bee, if feasible. The plan shall include effective, specific, and enforceable measures. An avoidance plan shall be submitted to the CDFW and City for approval prior to implementing Project-related ground-disturbing activities and/or vegetation removal where there may be impacts to Crotch’s bumble bee.</p>	<p>Prior to vegetation removal and ground-disturbing activities</p>	<p>Project Applicant/City</p>

**A2-19  
 cont.**



Elena Pascual  
 City of San Diego  
 May 3, 2024  
 Page 20 of 22

<p><b>MM-BIO-3- Incidental Take Permit</b></p>	<p>If Crotch’s bumble bee is detected and if impacts to Crotch’s bumble bee cannot be feasibly avoided, the Project applicant shall consult with CDFW and obtain appropriate take authorization from CDFW (pursuant to Fish &amp; G. Code, § 2080 et seq.). The Project applicant shall comply with the mitigation measures detailed in the take authorization issued by CDFW. The Project applicant shall provide a copy of a fully executed take authorization prior to the issuance of a grading permit and before any ground disturbance and vegetation removal.</p>	<p>Prior to issuance of grading permit and ground-disturbing activities</p>	<p>Project Applicant</p>
<p><b>Recommendation #2 Proposed Trails</b></p>	<p>Although CDFW acknowledges that trails are allowed within and adjacent to the MHPA lands consistent with Section 1.5.2 of the City’s SAP, we strongly recommend that proposed trails are not pre-emptively depicted in the DPEIR given the programmatic nature of the document. Prior to implementation of any trail projects, CDFW would appreciate the opportunity to evaluate site-specific species and habitat information to analyze biological impacts and determine if the proposed trails and consequent recreational activity are consistent with the MSCP.</p> <p>To facilitate our review of proposed trails, CDFW recommends that the following information be provided as subsequent trail projects move forward: an aerial photograph with an overlay of the proposed alignment of</p>	<p>Prior to issuance of project-level permits and prior to CEQA public review (if applicable)</p>	<p>Project Applicant/City</p>

A2-19 cont.

Elena Pascual  
 City of San Diego  
 May 3, 2024  
 Page 21 of 22

	<p>the trail in relation to any designated or proposed open space, specifications of trail design, measures to avoid/minimize impacts related to users straying off-trail or trail use by unauthorized vehicles such as electric bicycles, responsibility entity and activities related to maintenance, and a discussion of how the proposed location and use of the trail would be consistent with the SAP.</p>		
<p><b>Recommendation #3 Wildlife Agencies' Concurrence on Boundary Line Adjustments</b></p>	<p>To ensure consistency with the MSCP's conservation goals and objectives, future projects under the DPEIR should provide full disclosure and functional equivalency analysis of any proposed BLA per Sections 1.1.1 and 5.42 of the MSCP SAP (City of San Diego 1997). The Wildlife Agencies will need to agree and provide written concurrence for the requested BLA after we have had the opportunity to review all information provided by the City. When evaluating a proposed BLA and habitat equivalency assessment, the Wildlife Agencies generally consider the following biological goals:</p> <ul style="list-style-type: none"> <li>· No net loss of MHPA acreage;</li> <li>· No net reduction of higher sensitivity vegetation communities (i.e., Tier I, II, IIIa and IIIb);</li> <li>· Net impacts/conservation of covered listed species resulting from the BLA;</li> <li>· Net impacts/conservation of covered non-listed sensitive species resulting from the BLA; and</li> <li>· Landscape configuration to maintain connectivity of the MHPA (i.e., net effects to 'Preserve Design')</li> </ul>	<p>Prior to City approval of the BLA</p>	<p>City</p>

**A2-19  
 cont.**

Elena Pascual  
City of San Diego  
May 3, 2024  
Page 22 of 22

<b>Recommendation #4 Fish and Game Code 1600 Notification</b>	To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the DPEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of the LSAA. CDFW recommends the Applicant submit a Lake and Streambed Alteration Notification to CDFW. Notifications can be submitted through CDFW's Environmental Permit Information Management System (EPIMS), which can be found at <a href="#">Environmental Permit Information Management System (ca.gov)</a> (CDFW 2024c).	Prior to issuance of grading permit and ground-disturbing activities	Project Applicant
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A2-19 cont.

**A2: Response to California Department of Fish and Wildlife Comment Letter**

**A2-1:** The comment is an introduction to the attached comment letter. No response is necessary.

**A2-2:** The comment is an introduction to the comment letter. No response is necessary.

**A2-3:** The comment is an overview of the California Department of Fish and Wildlife's (CDFW's) role in the CEQA process. No response is necessary.

**A2-4:** The comment is a summary of the Blueprint SD Initiative, the University Community Plan Update (CPU), and the Hillcrest Focused Plan Amendment (FPA) and analysis contained in the PEIR. The comment does not raise an issue regarding the adequacy of the PEIR. It should be noted that the City has 52 community plans, not 48 as stated in the letter. The remainder of the summary is correct. The City of San Diego looks forward to continuing to monitor and manage potential biological impacts through the Implementing Agreement between the Wildlife Agencies.

**A2-5:** The comment is a summary of the project's location. No response is necessary.

**A2-6:** The comment is a summary of the biological setting as reported in the Draft PEIR. The comment notes that Crotch's Bumble Bee was not listed in the Draft PEIR list of species that have occurred or are likely to occur within the project areas. The Final PEIR Section 4.3.4, under Issue 1 has been revised to note that Crotch's Bumble Bee may be present throughout the City including within Blueprint SD Initiative's Climate Smart Village Areas, Hillcrest FPA area, and University CPU area. The City acknowledges that Crotch's Bumble Bee is a candidate for listing under the California Endangered Species Act (CESA) and will continue to work closely with CDFW to ensure impacts to the species are addressed as individual projects proceed. The City has been engaged with CDFW in ensuring projects include appropriate surveys, mitigation, and project conditions as necessary to address potential impacts to Crotch's Bumble Bee, consistent with CDFW recommendations. Through regular City and Wildlife Agency project meetings and coordination related to implementation of the MSCP and VPHCP, the City is ensuring implementation of CDFW guidance at the project level through required protocol surveys, consistent with the City's Biology Guidelines which requires surveys for candidate species and mitigation, as needed.

**A2-7:** The Draft Mitigation and Monitoring Reporting Plan (Attachment D to the comment letter) is noted. The City's existing mitigation framework, specifically MM-BIO-1, is sufficient to address the potential impacts of the project. MM-BIO-1 refers to City regulations and plans that have incorporated detailed performance standards from the City's Environmentally Sensitive Lands (ESL) Regulations, Multiple Species Conservation Program Subarea Plan (MSCP SAP), Vernal Pool Habitat Conservation Plan (VPHCP), and Biology Guidelines. The Draft Mitigation and Monitoring Reporting Plan provided by CDFW are measures that could be applied by individual projects; however, future site-specific surveys and evaluation would be required in order to confirm the specific mitigation requirements of individual projects. At a program level, it would not be appropriate to define project-specific mitigation requirements at this time.

**A2-8:** Updates to the City's Land Development Code (LDC) are detailed in Section 3.5.1.4 of the PEIR. As specified therein, updates would focus on implementation of the City's vision as defined in the General Plan, Climate Action Plan (CAP), and other City policy plans and documents. Anticipated

future LDC amendments would include amendments that facilitate ministerial processing of residential and mixed-use development, update the Historical Resources Regulations, modify parking regulations, or make changes to support development and mobility improvements. At this time, updates to the LDC that relate to biological resource protection and/or implementation of the MSCP SAP and/or VPHCP are not anticipated. The PEIR would not cover future changes to the LDC that remove or reduce any existing regulatory protections for biological resources. However, consistent with the City's implementing agreement with the Wildlife Agencies, if updates to the LDC are proposed that would affect the level of regulations and protections for sensitive biological resources, the City would consult with the Wildlife Agencies prior to any such action.

**A2-9:** The City's Biology Guidelines include guidance for conducting biological surveys. According to Section III(A)(1) of the Biology Guidelines, biological surveys are necessary "for all proposed development projects which are subject to ESL, and/or where the CEQA review has determined that there may be a significant impact on other biological resources considered sensitive under CEQA." Additionally, page 81 of the Biology Guidelines states, "If sensitive species (e.g., listed threatened or endangered species, candidate species, etc.) are on the site or are likely to be present, Focused Survey Reports will be required. Focused Survey Reports shall follow any required state or federal agency protocols where appropriate." Site-specific development is not proposed as part of this project, but as determined in the PEIR, development in accordance with the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA could result in significant and unavoidable biological impacts related to sensitive species, sensitive habitats, and wetlands. Mitigation measure MM-BIO-1 requires future discretionary development projects to comply with the Biology Guidelines, therefore, to conduct site specific surveys. As Crotch's Bumble Bee is currently a candidate for sensitivity status under CESA and CDFW is currently working on guidance regarding surveys for Crotch's Bumble Bee, mitigation would be applied as future site-specific surveys are conducted and projects are implemented. Survey requirements would be determined in coordination with the City and Wildlife Agencies, as required by the Biology Guidelines. Currently, the City is incorporating Crotch's Bumble Bee surveys with current CDFW guidance on development projects outside of the scope of this PEIR. The City looks forward to continuing to work with CDFW in incorporating applicable focused surveys to protect Crotch's Bumble Bee and mitigate any future impacts to the species from future site-specific projects.

**A2-10:** The proposed trails have been removed from the University CPU, the project description in Section 3.5.3(e) of the PEIR, from Figure 3-26 of the PEIR, and from the impact analysis in Section 4.3.4, Issue 4, of the PEIR.

**A2-11:** Comment noted. As discussed in Section 4.3.4, Issue 5, of the PEIR, the University CPU would add City-owned lands to the MSCP, which requires a boundary line correction (BLC). Any future project proposing a Boundary Line Adjustment (BLA) would continue to require Wildlife Agency concurrence and would be required to follow the BLA regulations set forth in Section 1.1.1 and 5.4.3 of the MSCP SAP. Please see response to Comment A3-13 in comment letter A3.

**A2-12:** Comment noted. Any future development or policy plan projects would be required to notify CDFW if any part or policy of the project could potentially affect the natural flow of, change the bed, channel, or bank of, or use material from a river, stream, or lake. Per Section 1600 et seq. of the

California Fish and Game Code, future applicants would be required to coordinate with CDFW complete a Lake and Streambed Alteration Agreement, if necessary.

As discussed in Section 4.3.4, Issue 3, the project could result in impacts to wetlands and other jurisdictional areas. Per the proposed mitigation, future projects that could directly and/or indirectly impact sensitive species, sensitive habitats, and/or wetlands shall comply with the City's ESL Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans, including but not limited to, the City's MSCP SAP and VPHCP. Future projects shall also implement avoidance, minimization, and mitigation measures in accordance with the City's ESL Regulations, Biology Guidelines, and MSCP SAP and VPHCP.

**A2-13:** The PEIR is a program level analysis and no site-specific species surveys were conducted; therefore, no field survey data is available to report. As future project-level surveys are conducted, appropriate reporting to the California Natural Diversity Database would be conducted.

**A2-14:** Comment noted.

**A2-15:** Comment noted.

**A2-16:** Attachment A to the CDFW letter is an excerpt from the PEIR identifying vegetation communities land cover types present throughout the City. No response is required.

**A2-17:** Attachment B to the CDFW letter is an excerpt from the PEIR identifying the special status plant species found in the project areas. No response is required.

**A2-18:** Attachment C to the CDFW letter is an excerpt from the PEIR identifying the special status plant wildlife species found in the project areas). No response is required.

**A2-19:** Attachment D includes CDFW's suggested mitigation measures and recommendations in the form a Draft Mitigation and Monitoring Reporting Plan. These measures are not proposed to be adopted as part of the Mitigation and Monitoring Reporting Plan but would inform future project requirements and mitigation consistent with MM-BIO-1. Refer to response A2-7.

## Comment Letter A3 - U.S. Fish and Wildlife Service

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan (Hillcrest FPA) and Local Coastal Program (University CPU)  
**Date:** Friday, May 17, 2024 3:54:11 PM  
**Attachments:** [20240517\\_2024-0090648\\_CEQA-DPEIR\\_SD\\_Blueprint\\_Hillcrest\\_FPA\\_UCPU.pdf](#)

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**From:** Garn, John C <[john\\_garn@fws.gov](mailto:john_garn@fws.gov)>  
**Sent:** Friday, May 17, 2024 3:39 PM  
**To:** [PLN\\_PlanningCEQA <planningceqa@sandiego.gov>](mailto:planningceqa@sandiego.gov); [Pascual, Elena <EPascual@sandiego.gov>](mailto:EPascual@sandiego.gov); [Kalinowski, Alison \(Ali\)@Wildlife <alison.kalinowski@wildlife.ca.gov>](mailto:alison.kalinowski@wildlife.ca.gov); [melanie.burlaza@wildlife.ca.gov](mailto:melanie.burlaza@wildlife.ca.gov)  
**Cc:** [Zoutendyk, David <David\\_Zoutendyk@fws.gov>](mailto:David_Zoutendyk@fws.gov); [Eng, Anita <anita\\_eng@fws.gov>](mailto:anita_eng@fws.gov); [York, Kelley T <kelly\\_york@fws.gov>](mailto:kelly_york@fws.gov)  
**Subject:** [EXTERNAL] Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan (Hillcrest FPA) and Local Coastal Program (University CPU)

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

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Good afternoon,

I hope this finds you healthy.

Please see attached.

*Please note - some Firewall or email security settings will strip the digital signature from the letter. Please review the attachment and if the digital signature is not intact, contact me for an alternate method of transmittal through the secure FWS fileshare program.*

*A hard copy letter will not follow.*

A3-1

Sincerely,  
John

John Garn  
Administrative Assistant  
U.S. Fish and Wildlife Service  
Carlsbad Fish and Wildlife Office  
Palm Springs Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008  
760.431.9440





# United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Ecological Services

Carlsbad Fish and Wildlife Office

2177 Salk Avenue, Suite 250

Carlsbad, California 92008



In Reply Refer To:  
2024-0090648-CEQA-DPEIR-SD

May 17, 2024  
*Sent Electronically*

Elena Pascual  
Senior Environmental Planner  
City Planning Department  
202 C Street  
San Diego, California 92101

Subject: Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan (Hillcrest FPA) and Local Coastal Program (University CPU)

Dear Elena Pascual:

The U.S. Fish and Wildlife Service (Service) has reviewed the above-referenced Blueprint SD Initiative (Blueprint), Hillcrest Focused Plan Amendment to the Uptown Community Plan (FPA), and University Community Plan Update (UCPU) and Local Coastal Program (LCP) and associated Draft Program Environmental Impact Report (DPEIR) dated March 14, 2024. We received an extension allowing us to provide comments up to May 17, 2024. The Service appreciates the City of San Diego’s (City) flexibility and the additional time. Our comments and recommendations are based on our knowledge of sensitive and declining vegetation communities and species in San Diego, and the City’s Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and Vernal Pool Habitat Conservation Plan (VPHCP).

A3-2

The mission of the Service is working with others to conserve, protect, and enhance fish, wildlife, plants and their habitats for the continuing benefit of the American people. The Service also has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States and is responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1) of the Act. The City participates in the HCP program by implementing its approved SAP and VPHCP.

A3-3

Blueprint is an update to the City’s General Plan that provides a policy framework for land use decisions, balancing the needs of the City and providing a City-wide vision and comprehensive approach for development, public services, and maintenance and enhancement of San Diego’s characteristic features. The strategy of the General Plan is based on a City of Villages concept that focuses growth into mixed-use, pedestrian-friendly districts linked by the planned regional transit system (City 2024a). The City’s community plans are guided by the General Plan and provide policies and recommendations pertaining to community-specific development over a

A3-4

20- to 30-year timeframe. Community plans provide more detailed land use designations and community-specific policies on topics including housing, mobility, open space and parks, public facilities, safety, noise, sustainability, environmental justice, urban design, and historic preservation (City 2024a).

Blueprint serves as an amendment to the General Plan and reflects the City’s goals, policies, and plans for housing, mobility and transit, environmental protection, and climate change adaptation and sustainable growth. The Blueprint identifies land use, transportation, and related policies to support future development according to the revised land use framework designed around the 2050 transportation network in the San Diego Association of Government’s (SANDAG) plan. The land use and policy amendments would build upon the climate goals outlined in the City’s Climate Action Plan (CAP) and Climate Resilient SD Plan (City 2024a).

The FPA proposes an amendment to the Uptown Community Plan to re-designate approximately 380 acres of the Hillcrest and Medical Complex neighborhoods with increases to the planned residential density and non-residential development capacity. The FPA establishes an updated vision and objectives that align with the SANDAG Regional Plan and the City’s General Plan policies, as proposed and amended by the Blueprint and the City of Villages Strategy, as well as adopted policies from the CAP, Parks Master Plan, and Climate Resilient SD. The FPA will update the land use plan and zoning for the FPA area, amend the existing Community Plan Implementation Overlay Zone (CPIOZ) - Type A - Building Heights within the Uptown Community Plan area, create three new CPIOZ areas (the Hillcrest District, the Hillcrest Historic District, and the Commercial Activity Area), and provide Supplemental Development Regulations (SDRs) for these CPIOZ areas (City 2024a).

The UCPU is a comprehensive update to the existing University Community Plan and Local Coastal Program. The UCPU revises the community plan consistent with the SANDAG Regional Plan, and the City’s General Plan policies, as proposed and amended by the Blueprint and recently adopted policies from the CAP, Parks Master Plan, and Climate Resilient SD. The UCPU includes changes to the land use plan and zoning and identifies several guiding principles, plan goals and policies, and procedures for plan implementation (City 2024a).

As stated above, the City participates in the HCP program through its SAP and VPHCP, and the Service issued the City permits to “take” federally threatened and endangered wildlife species pursuant to section 10 of the Act based on the City’s preparation and implementation of the SAP and VPHCP. Therefore, the Service recommends the direct incorporation of language from the SAP and VPHCP into Blueprint, the FPA, and UCPU to ensure compliance with these plans.

The Conservation Element of Blueprint, for example, identifies broad conservation goals such as “...protect, restore and enhance urban canyons and other important community open spaces...including those that have been designated in community plans...” (Section CE-B1c) and “protect, restore and preservation of wetland and upland areas on City managed lands, prioritizing areas with the greatest needs” (Section CE-B1g). However, conservation guidelines and priorities (Section 1.2), land use considerations (Section 1.4), and management goals, objectives, and priorities within a framework management plan for City managed MHPA lands

**A3-4  
cont.**

**A3-5**

(Section 1.5) already have been developed in coordination with the Wildlife Agencies [Service and California Department of Fish and Wildlife (CDFW) respectively] and presented in the SAP and incorporated into the VPHCP. By utilizing the SAP and VPHVP as the framework/basis of all conservation strategy discussed in planning documents, the City reinforces its commitment to implementing these activities consistent with the SAP and implementing agreement (IA) and the VPHCP.

A3-5 cont.

The relevance of the SAP and VPHCP as the guiding conservation documents for the City pertains, for example, to the current direction provided in the Blueprint Conservation Element to “Maximize the incorporation of trails and greenways linking local and regional open space and recreation areas into the planning and development review processes (CE-B5).” Section 1.5.2 of the SAP provides general management directives and priorities to address Public Access, Trails, and Recreation relative to the MHPA. Section 4.2.6 of the VPHVP also states that use of designated trails is considered a covered activity under the VPHCP, subject to conditions of the VPHCP and approved area-specific Natural Resource Management Plans (NRMPs). We recommend that Blueprint’s Conservation Element specifically reference or incorporate these general management directives, priorities, and conditions to ensure that any trails and greenways established under Blueprint are consistent with the SAP and VPHCP.

A3-6

The SAP should be similarly highlighted as the established conservation strategy in the UCPU. Currently, the UCPU states that “The Community Plan provides guidance for the design of building, structures, public facilities, parks, open space, and streets. The chapters of this Community Plan contain goals that express a broad intent for future development or preservation” (City 2024b, page 11). Guidance to encourage public access to open space in the context of species and habitat conservation and management of resources has been provided in the SAP. Including general management directives and priorities from the SAP would facilitate a cohesive approach to conservation for the City rather than redefining goals through general or community plan updates. Public access and the importance of public enjoyment of open space is acknowledged throughout the SAP, particularly in Section 1.5. By incorporating language from the SAP into the UCPU, the City would ensure that its previous commitment to species and habitat conservation through its SAP will be consistently applied in its updated planning documents.

A3-7

The Service is also concerned that graphics provided in Blueprint, UCPU, and the DPEIR prematurely depict alignments for anticipated recreational or mobility features without acknowledging or providing analysis of potential impacts to the MHPA. For example, the open space map in the Recreation Element of Blueprint (Figure RE-1), and figures throughout the Urban Design, Mobility, and Parks and Recreation sections of the UCPU include connections, paths, and trails that appear to border or cross the MHPA but provide no MHPA overlay. Figure 6 Urban Design Recommendations of the UCPU, for example, depicts enhanced multi-modal paths connected to linear parks and open space connections that appear to cross areas of designated open space, but also fails to show areas designated as MHPA (City 2024b, Page 50). Trails are also depicted in the UCPU (Figure 27, Page 129) and PEIR (Figures 3-15 and 3-26). These figures raise concerns as future users of Blueprint, UCPU, or the DPEIR would not be alerted to the potential constraints on recreational uses due to the necessary protection of sensitive biological resources associated with the SAP preserve.

A3-8

Therefore, we recommend the addition of an MHPA overlay to all maps depicting recreational or mobility uses in or adjacent to open space as well as accompanying text to clearly indicate that the alignments are conceptual and that final alignments will be determined in compliance with General and Specific Management Directives in the SAP as approved by the Wildlife Agencies. Overall, we recommend that recreational or mobility uses in or adjacent to the MHPA be planned as part of the NRMPs envisioned by the SAP and VHHCP to help ensure the long-term biological integrity of the MHPA.

**A3-8  
cont.**

The Service is also concerned with the City's proposed procedure for processing subsequent development projects following the preparation of this PEIR. According to the DPEIR, all future CPUs consistent with the DPEIR, as well as future projects deemed consistent with the General Plan or the amended CPU, would be evaluated in the context of this PEIR (Sections 1.2 and 3.5.1.3). While we anticipate continuing to work in partnership with the City on the implementation of the SAP and VPHCP, review of CEQA documents frequently provides the Wildlife Agencies an opportunity to review and comment on proposed projects to ensure that they are implemented consistent with the MSCP, SAP and IA, and VPHCP. Section 9.8 D of the IA for the City's SAP envisions tiering off the "program" EIR/EIS prepared for the City's SAP pursuant to CEQA to determine if additional environmental review is required. Section 8.6.2 of the VPHCP also states that additional review and approval by the Wildlife Agencies will be required for projects that include Environmentally Sensitive Lands (ESL; San Diego Municipal Code §113.0103)/Wetland Deviation/biologically superior options; reviewing and commenting on CEQA documents will be a key means for the Wildlife Agencies to ensure/monitor compliance with the requirements of the VPHCP. Consistent with our permits, the City's SAP and IA, and VPHCP, the Wildlife Agencies review ESL/Wetland Deviation/biologically superior options and CEQA documents to ensure/monitor compliance with the requirements of the City's SAP or VPHCP. Therefore, to ensure consistency with the City's SAP and VPHCP, we recommend that following language be added to Blueprint, the FPA and UCPU:

**A3-9**

"For future projects that have biological resources in or adjacent to the project site and the option of tiering from the programmatic documents (e.g., PEIR for General Plans, Community Plans, CPUs or other programs), the City will coordinate with the U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife (i.e., Wildlife Agencies) during the environmental review and permitting process and prior to staff-level CEQA determinations. If the City determines that the appropriate environmental documentation does not require circulation for public review, the Wildlife Agencies will be provided an opportunity to review and confirm project consistency with the City's SAP or VPHCP."

Furthermore, Section 3.5.1.3 of the PEIR also indicates that this DPEIR will likely serve as the basis for future changes to the Land Development Code. The VPHCP and Section 9.12 of the IA state that any modifications to the City's *Biology Guidelines* for the *Environmentally Sensitive Lands Regulations*, the *Open Space Residential Zone (OR-1-2)* and the *CEQA* require approval of the Wildlife Agencies.

**A3-10**

Therefore, we recommend that the City include a provision in Blueprint and the PEIR that requires all future changes to the Land Development Code to be consistent with the VPHCP and Section 9.12 of the IA.

**A3-10  
cont.**

Section 4.3.4 of the DPEIR states, “Although the Blueprint SD Initiatives’ policy and land use framework would apply Citywide, it is anticipated that potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas” (Page 4.3-53). If only Climate Smart Village Areas were analyzed for Blueprint, it is unclear if an analysis of Blueprint impacts to sensitive biological resources was completed and if that analysis included the FPA and UCPU project areas. It is also unclear how Blueprint can apply Citywide or how the City determined the significant impacts of the plan in the DPEIR if only Climate Smart Village Areas were analyzed.

**A3-11**

Section 4.10.2.2.i of the DPEIR states that impacts to land identified as 100 percent baseline conservation in the VPHCP can be addressed through a Boundary Line Adjustments (BLA) consistent with the VPHCP. In 1997, the City Subarea Plan under the MSCP was approved by the Wildlife Agencies. In 2017, the Service approved the City’s VPHCP. Both plans designated areas as MHPA that would be established as biological preserves as developments were entitled, while also identifying areas of permanently conserved lands. Infrastructure such as roads and utilities are allowed uses in the MHPA consistent with established guidelines; however, permanently conserved lands (defined as Preserve<sup>1</sup> lands or Conserved<sup>2</sup> lands/100 percent conserved lands in the MSCP and VPHCP) are not anticipated or authorized to be impacted by development, including infrastructure. Therefore, this section should be amended to clarify that impacts to general/non-conserved MHPA can be addressed through a BLA but substantive impacts to 100 percent baseline conservation lands would require an amendment to the VPHCP.

**A3-12**

Finally, the Service would like to clarify the procedure anticipated for the comprehensive community wide MHPA Boundary Line Correction (BLC) proposed as part of the University Community plan update. This is described in the Biological Technical Report for the UCPU (Busby 2024) and includes the proposed addition of 25.97 acres to the MHPA, and the exclusion of legally developed and required uses (i.e., structures, streets, brush management zone 1). We appreciate the proposed addition of 25.97 acres to the MHPA, but no acreages or maps were provided for the proposed exclusions. Because the Service has not had the opportunity to review supporting information or maps depicting the proposed exclusions anticipated with this comprehensive BLC, we request the UCPU clarify that these will be presented to the Wildlife Agencies at the time of future project permitting.

**A3-13**

Additional specific comments on Blueprint, the FPA, UCPU and LCP and the PEIR are appended (see appendix). We appreciate the opportunity to comment on these documents. If you have any

<sup>1</sup> The Preserve is defined as “areas within the MHPA that have been conserved and existing baseline conservation areas” (VPHCP, p. xi).

<sup>2</sup> Conserved lands are defined as “Lands with 100 percent hardline conservation (no development is permitted)” (VPHCP, p. ix).

Elena Pascual (2024-0090648-CEQA-DPEIR-SD)

7

questions regarding this letter or to schedule a meeting to discuss the proposed project or our recommendations, please contact Anita Eng of the Service at 760-431-9440, extension 302.

Sincerely,

**JONATHAN SNYDER**  
Digitally signed by  
JONATHAN SNYDER  
Date: 2024.05.17  
15:09:10 -07'00'  
Jonathan D. Snyder  
Assistant Field Supervisor

Appendix

### LITERATURE CITED

- [Busby] Busby Biological Services, Inc. 2024. Biological Resources Report University Community Plan Update, City of San Diego, San Diego County, California. Prepared for City of San Diego City Planning Department. Prepared by Busby Biological Services, Inc. in coordination with RECON Environmental, Inc. January.
- [City] City of San Diego. 1997. Multiple Species Conservation Program, City of San Diego MSCP Subarea Plan. March.
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- [City] City of San Diego. 2024a. Draft Program Environmental Impact Report. Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update. Planning Department. Draft Document: March 14, 2024.
- [City] City of San Diego. 2024b. University Community Plan and Local Coastal Program. Draft Plan. March.
- [City] City of San Diego. 2024c Draft General Plan Amendment. Conservation Element. March.
- [City] City of San Diego. 2024d. Draft General Plan Amendment. Recreation Element. March.



## APPENDIX

Specific comments on Blueprint, the FPA, UCPU and LCP and the PEIR:

### Comments on the University CPU:

1. Section 1 Introduction. We recommend that the UCPU include a summary description of the City's SAP and VPHCP along with the descriptions of the CAP, Parks Master Plan, and Climate Resilient SD.
2. Section 3.0 Urban Design. Pages 90, 92, and 94 depict potential connections and trails without corresponding analysis of biological resources in the UCPU BTR to confirm that these alignments comply with the SAP. Given that specific project-level information is not currently available, we recommend the addition of language from section 1.5.2 of the SAP to UCPU to guide design of future trail alignments. A mitigation measure also should be included in the PEIR to offset program impacts to open space and associated wildlife corridor and linkages. The measure should require that proposed trail and pathway connections in the vicinity of the MHPA must be designed consistent with Section 1.5.2 of the SAP and 4.2.6 of the VPHCP and developed in coordination with the Wildlife Agencies to ensure the consideration of only those alignments consistent with SAP and VPHCP implementation.
3. Figure 24 of the UCPU (Page 117) depicts 2-lane collector roads and 4-lane arterial roads approaching or adjacent to conserved lands. The UCPU BTR Figure 4 (Page 9) depicts Open Space areas to be included in the MHPA as 100 percent conserved lands. We recommend an additional figure with an MHPA overlay on the UCPU street network map as well as added language to clarify to future users of the plan that development that encroaches on MHPA is restricted and encroachment into 100 percent conserved lands is prohibited.
4. Section 5.0 Parks and Recreation (Page 121). Currently, the presentation of parks and open space in the UCPU could mislead users of the plan to view parks and open space interchangeably. In the Parks and Recreation section, for example, goal 4 recommends: "Improve overall park connectivity by linking population-based parks with resource-based parks and open space lands through a system of pedestrian paths, bikeways, and transit." We recommend revisions to the UCPU to incorporate language directly from Sections 1.5.2 and 4.2.6 of the SAP and VPHCP, respectively. Coordinating language between the UCPU and the established goals and objectives of the SAP and VPHCP would reinforce the City's responsibility to protection and management of open spaces in accordance with its permit under Section 10(a) of the Act while considering recreation priorities.
5. Section 6.0 Open Space and Conservation Element (Page 136) should include a summary of MSCP SAP and VPHCP objectives. The MSCP already addresses most issues presented in Goal No. 4 and 6.

A3-14



Goal No. 6 should be revised to limit public access to portions of the MHPA until further project-level analysis can confirm that such access is compatible with specific areas in the MHPA in accordance with the SAP and VPHCP.

Goal No. 2 should be revised to include restoration of wetland resources and to specify that enhancement would not involve the installation of man-made structures in wetland resources.

- 6. Open Space Dedications (page 142). The dedication of 183.6 acres of City-owned properties as open space pursuant to Charter Section 55 was presented as an informational item to the Wildlife Agencies on Jan. 19, 2024. Following the MHPA boundary line correction and dedication, these properties would be MHPA – 100 percent Conserved. Please add this information to the description of Open Space Dedications in the UCPU.
- 7. Section 8.0 Implementation (page 177, Table 1 Subcategory B and F). Implementation of the MSCP SAP and VPHCP is the City’s responsibility in accordance with its permit and IA under section 10 of the Act and would not be considered a Community Plan policy that applies only to Trails, Overlooks, and Trailhead Pocket Parks. The UCPU should be revised accordingly.
- 8. Section 8.0 Implementation (Page 177, Table 1 Subcategory G). Compliance with the ESL Regulations, Biology Guidelines and MSCP SAP are required by the City’s Municipal Code. It is the City’s responsibility in accordance with its section 10 permit and IA to ensure project compliance with its ESL regulations. This compliance would not be considered a Community Plan policy.

A3-14  
cont.

**Comments on the DPEIR:**

- 9. Page 4.1-15 “The University CPU does not propose any development within its open space areas.” This statement is not consistent with potential connections and trail opportunities (page 94–95) and pocket parks (page 98–99) depicted within canyon open space areas. The DPEIR should be updated to correct this discrepancy and disclose the project impact on open space. We also recommend that the DPEIR include a mitigation measure to require that potential connections and trail opportunities be designed in accordance with the SAP and VPHCP. Proposed alignments in the vicinity of MHPA open space would require coordination with the Service (see comment 2).

A3-15

- 10. On DPEIR page 4.3-48 please include the complete text taken from the Municipal Code to include the reference to the MSCP, MHPA, and SAP:

“It is further intended for the Development Regulations for Environmentally Sensitive Lands and accompanying Biology, Steep Hillside, and Coastal Bluffs, and Beaches Guidelines to serve as standards for the determination of impacts and mitigation under the California Environmental Quality Act and the California Coastal Act. These standards will also serve to implement the Multiple Species Conservation Program by placing priority on the preservation of biological resources within the

A3-16

Multiple Habitat Planning Area, as identified in the City of San Diego Subarea Plan. The habitat-based level of protection which will result through implementation of the Multiple habitat Planning Area is intended to meet the mitigation obligations of the Covered Species addressed.”

**A3-16  
cont.**

- 11. Section 4.3.4 Impact Analysis states, “Although the Blueprint SD Initiatives’ policy and land use framework would apply Citywide, it is anticipated that potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas” (Page 4.3-53). The Impact Analysis further states that (Page 4.3-53):

“Sensitive plant species habitat in the City is typically concentrated in areas designated as Open Space that may be located within the MHPA. Although development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to occur within urban areas that are already developed with commercial, industrial, residential, or employment uses where there is a low potential to support extensive sensitive plant species habitat, the details of future site-specific projects are unknown at this time, and it is possible that some project areas may support sensitive plant species habitat.”

In Blueprint, a program-level analysis of Project impacts to sensitive biological resources was completed only for Climate Smart Village Areas. Program-level impacts on the sensitive biological resources on the rest of the City are not adequately analyzed in the PEIR because the presence and nature of the biological resources must be established before a determination of significance of an impact can be made (City 2018, page 71).

**A3-17**

The DPEIR recognizes that sensitive plants and wildlife are likely to occur within the Open Spaces of Blueprint, Hillcrest FPA, and UCPU (City 2024a, pages 4.3-53, 54, 56; City 2024b, pages 139 and 140). We recommend that the program-level of analysis in the DPEIR include baseline biological conditions for all undeveloped land included within the boundaries of Blueprint, not only within the Climate Smart Village Areas. The literature used to inform the impact analysis should include current species data for undeveloped lands (including MHPA and all open space) in order to develop a program-level mitigation framework for the sensitive biological resources existing within the plan area. Mitigation for species identified in Table 4.3-2 and 4.3-3 of the DPEIR should be provided to guide the development of future project specific mitigation that would include, but not be limited to, mitigation identified at the program level. Alternatively, the PEIR should specify that the policy and land use framework described in Blueprint applies only to the Climate Smart Village Areas and future tiering would be limited to projects located in those areas.

- 12. Though future regulatory compliance is anticipated at the project level, specific measures are necessary to address the anticipated program impacts from the implementation of Blueprint, FPA, and UCPU. To offset program-level significant impacts to sensitive species and their habitats, we recommend the addition of a

**A3-18**

mitigation measure to the PEIR to facilitate future project avoidance of the MHPA, requiring that that project design will be consistent with the SAP and VPHCP.

**A3-18 cont.**

We also recommend that the Blueprint PEIR include, in Table ES-1 and in Chapter 4.0, the following language from the SAP and Biology Guidelines to recognize the restrictions on development in the MHPA: “Within the MHPA, development is limited (SAP page 1). Development impacts on private lands within the remainder of the MHPA will be restricted to no more than 25 percent of the parcel (75 percent preservation). Development within the MHPA will be directed to areas of lower quality habitat and/or areas considered less important to the long-term viability of the MHPA. Documented populations of covered species within the City’s portion of the MHPA will be protected to the extent feasible (SAP page 43).” We also recommend the following language from the Biology Guidelines, “The City’s permit to ‘take’ Covered Species under the MSCP is based on the concept that 90 percent of lands within the MHPA will be preserved. Any encroachment into the MHPA (in excess of the allowable encroachment by a project) would be considered significant and require a boundary line adjustment which would include a habitat equivalency assessment to ensure that what will be added to the MHPA is at least equivalent to what would be removed (Biology Guidelines page 73).” The PEIR should also clarify that Boundary Line Adjustments and Boundary Line Corrections must be reviewed and approved by the Wildlife Agencies.

**A3-19**

**A3-20**

**A3-21**

- 13. Table ES-1 Summary of Impacts, Section 4.3 Biological Resources Issue 3 states that “Although wetlands in the project areas are concentrated in the MHPA, including canyons, and creeks, since site-specific future development is unknown at this time, there is a potential that wetlands could be affected. Implementation of the City’s ESL Regulations, Biology Guidelines, MSCP SAP, and VPCHP would ensure impact to wetlands would be avoided to the extent feasible and a wetland buffer provided around all wetlands as appropriate to protect the functions and values of the wetland (City 2018).”

We recommend the addition of the following direction from the City’s Biology Guidelines to Table ES-1 and the corresponding impact analysis in Section 4.0 of the DPEIR: “Under the ESL, impacts to wetlands should be avoided. Unavoidable impacts should be minimized to the maximum extent practicable. Whether or not an impact is unavoidable will be determined on a case-by-case basis. Examples of unavoidable impacts include those necessary to allow reasonable use of a parcel entirely constrained by wetlands, roads where the only access to the developable portion of the site results in impacts to wetlands, and essential public facilities (essential roads, sewer, water lines, etc.) where no feasible alternative exists. Unavoidable impacts will need to be mitigated in accordance with Section III.B.1.a of these Guidelines (Biology Guidelines pages 11–12).”

**A3-22**

Furthermore, the PEIR concludes project impacts to wetlands are significant after mitigation, but mitigation measures to facilitate avoidance and minimization of wetland impacts from the program have not been provided. Future review in accordance with

**A3-23**

the City’s ESL Regulations does not directly offset the impact of the project analyzed by the PEIR. To offset program level impacts, we recommend that the DPEIR include a mitigation measure that requires compliance with the Biology Guidelines and its directive to avoid impacts to wetlands.

A3-23  
cont.

14. The DPEIR states, “As no specific projects have been identified, it cannot be guaranteed that every future project would be able to demonstrate no net loss of wetland habitat. Therefore, at a program level of review, impacts would be significant.” (Page 4.3-59). This conflicts with the City’s policy of no-net-loss of wetlands (City 2018, page 37) and Section 9.8 of the IA that requires compliance with the federal policy of “no net loss” of wetland functions and values. We agree that net loss of wetlands would constitute a significant impact but recommend that the DPEIR include the goal of no-net-loss of wetlands in its mitigation measures (see Comment 13).

A3-24

15. Table ES-1 Summary of Impacts, under Section 4.3 Biological Resources Issue 4 states that, “Regional and local wildlife corridors are not located within the project areas due to their location within open space and MHPA lands. Open Space land use designation would not be changed by the proposed plans.” While open space designations are not changed by the proposed plans, Blueprint represents the MHPA as a recreational asset in the Recreation Element without acknowledging its importance as a preserve area and the associated limitations on the extent and intensity of recreation that is appropriate in these areas. The MHPA is included in the list of lands considered General Plan - designated open space and parks and followed by a discussion of various recreation priorities such as equitable access to a diversity of recreation facilities and programs; partnerships in planning and design of park and recreation facilities; identification of recreation needs; and preservation of existing park uses (City 2024d, page RE-19).

The Conservation Element similarly adds undefined “recreational opportunities” to CE-B1c, a policy that previously focused on the protection, restoration, and enhancement of urban canyons and other community open spaces for their many local and regional benefits as part of a Citywide open space system (City 2024c, page CE-18). Such revisions to the language in these Elements of the General Plan cause concern, particularly given that these documents were updated for consistency with the MSCP SAP and VPHCP at the time of the City’s Federal permit issuance. In order to ensure continued consistency with these permits, the SAP and VPHCP should guide the proposed recreational uses of MHPA within the City. We request that where MHPA is referenced in Blueprint, FPA, and UCPU, language taken directly from the IA, SAP, and VPHCP be included or referenced to provide consistent guidance on appropriate recreational uses in the preserve.

A3-25

16. The analysis of Issue 4 on page 4.3-59 states “The University CPU identifies potential new trails in the Open Space area next to Marcy Neighborhood Park; however, implementation of these trails is not proposed at this time.” While no specific trail project has been identified at this time, the inclusion of multiple conceptual trails throughout open space areas within City limits through Blueprint, Hillcrest FPA,

A3-26

and UCPU introduce the possibility of recreational uses that have not been analyzed. We recommend the addition of mitigation in the PEIR for program-level impacts to open space and associated wildlife use. The measure should require design of trails in accordance with Section 1.5.2 of the SAP and Section 4.2.6 of the VPHCP.

**A3-26  
cont.**

**A3: Response to US Fish and Wildlife Service Comment Letter**

**A3-1:** The comment is an introduction to the attached comment letter. No response is necessary.

**A3-2:** The comment is an introduction to the comment letter. No response is necessary.

**A3-3:** The comment is an overview of the US Fish and Wildlife Service's (USFWS's) mission. No response is necessary.

**A3-4:** The comment is a summary of the Blueprint SD Initiative, the University Community Plan Update (CPU), and the Hillcrest Focused Plan Amendment (FPA). No response is necessary.

**A3-5:** As stated in the comment, the City has a Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and a Vernal Pool Habitat Conservation Plan (VPHCP). As described in Section 4.10.2.2(f) of the PEIR, the MSCP establishes adjacency guidelines to be addressed on a project-by-project basis to minimize direct and indirect impacts and maintain the function of the Multi-Habitat Planning Area (MHPA). The Land Use Adjacency Guidelines would be incorporated as project conditions of approval, which would preclude indirect impacts to the MHPA. Note that the MHPA Land Use Adjacency Guidelines would apply to land within the MHPA and the expanded MHPA as adopted by the VPHCP. The conservation goals of the General Plan Conservation Element, as updated by the Blueprint SD Initiative, provide high-level policy guidance that supports the implementation of the MSCP SAP or VPHCP. Additional language directly from the MSCP SAP and VPHCP are not warranted as the suggested language would not increase implementation requirements of the existing regulatory framework.

**A3-6:** This comment on the Blueprint SD Initiative is noted. See response to Comment A3-5 above.

**A3-7:** As stated in the comment, the University CPU includes overarching goals with the intention of guiding development within the University CPU area. As a land use policy framework, the University CPU is intended to guide development with the intention of supporting and reinforcing existing land use plans, such as the MSCP SAP and VPHCP. Additional language directly from the MSCP SAP and VPHCP is not warranted as suggested language would not increase protections for sensitive biological resources beyond the existing regulatory framework.

**A3-8:** This comment is noted. The proposed trails have been removed from the project description in Section 3.5.3I, from Figure 3-26, and from the impact analysis in Section 4.3.4, Issue 4.

**A3-9:** The City as the lead agency on future development projects within the City's land use jurisdiction is responsible for making environmental determinations. In the event no CEQA public review is required for a development project, the City would continue to consult with the California Department of Fish and Wildlife (CDFW) and USFWS in association with the review of proposed MHPA Boundary Line Adjustments and Biologically Superior Option wetland deviations processed under the City's ESL Regulations. Specifically, the Biology Guidelines (page 33) requires the City to seek input and concurrence on proposed Biologically Superior Option wetland deviations. Specifically, it states, "concurrence shall be in writing and be provided prior to or during the public review of the CEQA document in which the biologically superior project design has been fully described and analyzed." In the case of no public review, the City would be required to obtain

concurrence prior to project approval. The City's MSCP Subarea Plan (SAP) also requires wildlife agency concurrence for any boundary line adjustments. Specifically, Section 1.1.1 of the MSCP SAP states, "The determination of the biological value of a proposed boundary change will be made by the City in accordance with the MSCP plan, with the concurrence of the wildlife agencies."

Additionally, the requirements of MSCP Implementing Agreement (Section 14.0) requires the City to prepare and submit to the USFWS and the CDFW each year a public report containing an annual accounting, by project and cumulatively, of habitat acreage lost and conserved within the Subarea during the previous calendar year. This accounting shall specify acres conserved within the MHPA by habitat type, as well as acres committed to land development both within and outside of the MHPA and compare these figures with results obtained utilizing the Habitat Conservation Accounting Model (HabiTrak). This report shall also describe how habitat preservation is proceeding in rough step with development. The report will be used by the USFWS and CDFW to evaluate whether adequate progress toward implementation of the MSCP and the Subarea Plan is being achieved. A public workshop or meeting will be jointly conducted on an annual basis by staff from the USFWS, the CDFW and the City to disseminate and discuss the annual report. The Parties review the Annual Report for the purposes of evaluating the implementation of the MSCP during the preceding year and the adequacy of the overall progress being made towards reaching the conservation goals of the MSCP and the Subarea Plan, utilizing HabiTrak. Items to be considered in the evaluation include, but are not limited to, all contributions towards the preservation of habitat lands, such as public lands, private mitigation lands, land donations, land acquisitions, and management activities undertaken or proposed on habitat lands. Habitat management issues are also be discussed. If the USFWS and the CDFW determine that adequate progress towards implementation of the Subarea Plan is not being achieved, the USFWS, the CDFW, and the City will take the actions specified in the Subarea Plan and the Implementing Agreement to remedy that situation. If the USFWS and CDFW determine that adequate progress towards implementation of the Subarea Plan is being achieved but is nevertheless not providing sufficient protection to Covered Species, then the Parties work cooperatively and take appropriate actions consistent with the MSCP and Subarea Plan (such as altering management activities or redirecting mitigation and acquisition) in order to address the situation.

**A3-10:** Updates to the City's Land Development Code (LDC) are detailed in Section 3.5.1.4. As specified therein, updates would focus on implementation of the City's vision as defined in the General Plan, CAP, and other City policy plans and documents. Anticipated future LDC amendments would include amendments that facilitate ministerial processing of residential and mixed-use development, update the Historical Resources Regulations, modify parking regulations, or make changes to support development and mobility improvements. At this time, updates to the LDC that relate to biological resource protection and/or implementation of the MSCP SAP and/or VPHCP are not anticipated. The PEIR would not cover future changes to the LDC that remove or reduce any existing regulatory protections for biological resources. Additionally, consistent with the City's implementing agreement with the wildlife agencies, if updates to the LDC are proposed that would affect the level of regulations and protections for sensitive biological resources, the City would consult with the wildlife agencies prior to any such action.

**A3-11:** In Section 4.3.4, the biological resources of each planning area—the Blueprint SD Initiative area, the Hillcrest FPA area, and the University CPU area—were each assessed separately. For the

University CPU, a separate biological report and survey were conducted because of the higher quantity of biological resources in that area. The tiering of future CEQA documentation from the Blueprint SD Initiative, University CPU, and Hillcrest FPA PEIR would be allowed for projects that fall within the scope of these project components as defined in Chapter 3.0, Project Description. As described in the significance determination of Section 4.3.5 of the PEIR, the potential biological resource impacts of future projects consistent with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU development areas would be assessed at the time future development is proposed.

**A3-12:** As described in Section 8.4.2 of the VPHCP, “[BLAs] to the MHPA within the VPHCP Plan Area may be made without the need for a major amendment to the VPHCP in cases where the new boundary results in an area of equivalent or higher biological value in the MHPA.” The triggers for minor and major amendments are identified in Sections 8.4.3 and 8.4.4 of the VPHCP, respectively. Minor amendments are made in relation to two airports: Montgomery-Gibbs Airport and the Brown Field Airport. Major amendments are made in special cases when the following conditions occur:

- Increased level of take/impact of a covered species.
- Addition of a covered species.
- Addition or substantial modification to a Covered Activity that could reduce conservation commitments in the VPHCP.
- Annexations that are inconsistent with the VPHCP.
- A material amendment, revision or update to the ESL or Biology Guidelines, General Plan or other local land use laws or ordinances that would affect implementation of the VPHCP in accordance with the Permit.

The USFWS suggested revision does not align with the definition of a major amendment in section 8.4.4 of the VPHCP, and the suggested “substantive impacts to the 100% baseline conservation lands” is not clearly defined. Nevertheless, the City would ensure future development would be in compliance with the VPHCP and consult with USFWS as necessary to ensure successful implementation of the VPHCP.

**A3-13:** Comment noted. No MHPA Boundary Line Corrections (BLCs) exclusions are proposed as part of the University CPU. As future site-specific projects are proposed, BLC exclusions would be considered at the staff level where there is evidence of a mapping error due to when the subject parcel in question was developed prior to MSCP SAP adoption. The language regarding comprehensive BLCs is in regard to future CPUs and brings forward BLC criteria language prepared in coordination with the Wildlife Agencies. The University CPU’s comprehensive BLC addition was presented at Wildlife coordination meeting on January 19, 2024 and was clarified that no MHPA deletions were proposed. The City looks forward to continuing to work with USFW and CDFW on future comprehensive MHPA BLCs.

**A3-14:** The comments relate to the content of the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA. See A3-5 through A3-7. The comments are not related to the adequacy of the analysis in the PEIR. No response is required.

**A3-15:** See response to comment A3-8.



**A3-16:** Comment noted. This language has been added to the Final PEIR, in Section 4.3.2.3(a).

**A3-17:** The Biological Resources Report was prepared to support a program-level evaluation of potential impacts. For purposes of implementation of the Blueprint SD Initiative, the primary location of land use change is anticipated to occur within Climate Smart Village Areas; therefore, the PEIR discloses the resources present within these areas to provide a good faith effort to disclose the potentially significant impacts of the project. The City does not agree that the disclosure of baseline biological conditions should have covered the entire City because that information would not provide meaningful information about the nature and scope of anticipated impacts.

At a program level of review, it would not be appropriate to develop mitigation frameworks for specific species or resources at this time. The City's Biology Guidelines and regulatory framework ensures appropriate project level mitigation is identified. Furthermore, the mitigation framework MM-BIO-1 identified for the project would apply Citywide as the measure reflects the regulatory requirements that the City would apply in order to develop project specific mitigation. Please also see response to comment A3-11.

**A3-18:** As discussed under Section 4.3.4, Issue 1 (b), of the Draft PEIR, all ministerial and discretionary projects must comply with the City's MSCP SAP, VPHCP, ESL Regulations and Biology Guidelines. Additionally, mitigation measure MM-BIO-1, in section 4.3.6 of the PEIR, reinforces this compliance. Additional mitigation measures are not warranted due to the existing regulatory framework in place under the MSCP SAP and VPHCP.

**A3-19:** Table ES-1, the Summary of Environmental Impacts table, in the Executive Summary of the PEIR, discusses the results of the impact analysis, not necessarily the regulatory conditions. This information is, however, provided in Section 4.10.2.2 (h) of the PEIR under the heading "MHPA Boundary Line Adjustments."

**A3-20:** The requested information is found in Section 4.10.2.2 (h) of the PEIR under the heading "MHPA Boundary Line Adjustments." The information about 90 percent of the lands being preserved has been added to the Final PEIR.

**A3-21:** In Section 4.10.4, Issue 2 (f), of the PEIR, the necessity of coordination with the Wildlife Agencies is stated: "Furthermore, Wildlife Agency concurrence would be required for boundary line adjustments consistent with the City's MSCP Implementing Agreement."

**A3-22:** The requested information is found in Section 4.3.4, Issue 3, of the PEIR (see the bulleted items). As mentioned in response to comment A3-19, the Summary of Environmental Impacts table, in the Executive Summary of the PEIR, discusses the results of the impact analysis, not necessarily the regulatory conditions.

**A3-23:** Mitigation measure BIO-1, in section 4.3.6 of the PEIR, reinforces required project compliance with the City's Biology Guidelines and, therefore, its directive to avoid wetland impacts. Additional mitigation measures are not warranted as the suggested language would not increase protections for wetlands beyond the existing regulatory framework and MM-BIO-1.

**A3-24:** The existing mitigation measure (MM-BIO-1) reinforces required compliance with the City's ESL Regulations and Biology Guidelines. The Biology Guidelines already includes language enforcing the "no-net-loss" requirement as detailed in Section B.1.a of the City's Biology Guidelines; therefore, it is not necessary to restate this information in the measure. Future development projects would be required to demonstrate no-net-loss for consistency with the City's ESL Regulations and City's Biology Guidelines.

**A3-25:** This comment on the Blueprint SD Initiative's proposed changes to the General Plan Conservation Element are noted. MHPA and VPHCP areas within the City's designated open space are protected through the City's regulatory restrictions as described in the City's ESL Regulations and Biology Guidelines. Additionally, per Section 131.0204 of the City's Municipal Code (SDMC), open space zones "...implement the habitat preservation goals of the City and the MHPA by applying development restrictions to lands wholly or partially within the boundaries of the MHPA." Not all lands that are designated as open space are located within the MHPA , but for those that are, the ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP would be applicable to future proposed recreational projects within the MHPA.

**A3-26:** See response to comment A3-8.

## **ORGANIZATIONS**

## Comment Letter O1 - Circulate San Diego

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University City Community Plan Update (CPU)  
**Date:** Thursday, April 25, 2024 1:26:23 PM  
**Attachments:** [4-24-24 UC Plan EIR Comment Letter - FINAL.pdf](#)  
[-WRD0001.jpg](#)

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**From:** Jeremy Bloom <[jbloom@circulatesd.org](mailto:jbloom@circulatesd.org)>  
**Sent:** Thursday, April 25, 2024 11:44 AM  
**To:** [PLN\\_PlanningCEQA](mailto:planningceqa@sandiego.gov) <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** Gloria, Todd <[MayorToddGloria@sandiego.gov](mailto:MayorToddGloria@sandiego.gov)>; CouncilMember Sean Elo-Rivera <[SeanEloRivera@sandiego.gov](mailto:SeanEloRivera@sandiego.gov)>; CouncilMember Joe LaCava <[JoeLaCava@sandiego.gov](mailto:JoeLaCava@sandiego.gov)>; CouncilMember Kent Lee <[KentLee@sandiego.gov](mailto:KentLee@sandiego.gov)>; Vonblum, Heidi <[VonblumH@sandiego.gov](mailto:VonblumH@sandiego.gov)>; Galloway, Tait <[TGalloway@sandiego.gov](mailto:TGalloway@sandiego.gov)>  
**Subject:** [EXTERNAL] University City Community Plan Update (CPU)

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Dear Heidi -

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to express our support for adopting the most robust and pro-housing, pro-climate options for the University City Community Plan Update.

O1-1

Circulate, alongside our allies, has championed a plan addressing the urgent need for increased homes and access to transit in our region. Our report "[Making the Most of The Mid-Coast Trolley](#)" highlights the significant benefits the University City community could enjoy from expanding housing options in the area.

O1-2

We appreciate City Staff for including [the most robust plan as an alternative for the Environmental Impact Report](#) and are thrilled to see that it is recognized as the "environmentally superior alternative." Adopting this robust alternative would be a significant win for our region.

O1-3

Furthermore, Circulate recognizes that the land use plans must account for the changing needs of the University City area. We support and concur with BioCom California, as outlined in their attached March 27, 2024 letter, that adopting Urban Flex and Prime Flex land use in the EMX-1 zone in the North Torrey Pines area would open new and important opportunities. Fortunately, including those designations would not have a significant impact on the City's environmental

O1-4

analysis

O1-4  
cont.

University City will be a pivotal regional hub for San Diego for generations to come, and we are heartened to see that the present EIR and draft Community Plan Update reflect this reality. As we await the City Council's decision, Circulate remains committed to making the most of the Mid-Coast Trolley.

O1-5

Please do not hesitate to contact me if you would like to discuss this further.

Jeremy Bloom  
Chief Operating and Development Officer

Image removed by sender.



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Email: [jbloom@circulatesd.org](mailto:jbloom@circulatesd.org)



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April 24, 2024

Planning Director Heidi Vonblum  
City of San Diego Planning Department  
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VonblumH@sandiego.gov

**Re: University City Community Plan Update (CPU)**

On behalf of Circulate San Diego, whose mission is to create excellent mobility choices and vibrant, healthy neighborhoods, I am writing to express our support for adopting the most robust and pro-housing, pro-climate options for the University City Community Plan Update.

Circulate, alongside our allies, has championed a plan addressing the urgent need for increased homes and access to transit in our region. Our report "[Making the Most of The Mid-Coast Trolley](#)" highlights the significant benefits the University City community could enjoy from expanding housing options in the area.

We appreciate City Staff for including [the most robust plan as an alternative for the Environmental Impact Report](#) and are thrilled to see that it is recognized as the "environmentally superior alternative." Adopting this robust alternative would be a significant win for our region.

Furthermore, Circulate recognizes that the land use plans must account for the changing needs of the University City area. We support and concur with BioCom California, as outlined in their attached March 27, 2024 letter, that adopting Urban Flex and Prime Flex land use in the EMX-1 zone in the North Torrey Pines area would open new and important opportunities. Fortunately, including those designations would not have a significant impact on the City's environmental analysis

University City will be a pivotal regional hub for San Diego for generations to come, and we are heartened to see that the present EIR and draft Community Plan Update reflect this reality. As we await the City Council's decision, Circulate remains committed to making the most of the Mid-Coast Trolley.

Please do not hesitate to contact me if you would like to discuss this further.

O1-6

Best regards,



Jeremy Bloom  
Chief Operating Officer  
Circulate San Diego

CC:

Mayor Todd Gloria  
Council President Sean Elo-Rivera  
Council President Pro Tem Joe LaCava  
Councilmember Kent Lee  
Tait Galloway, Deputy Director, Community Planning & Housing

Attachment: Letter from Biocom California, dated March 27, 2024.



March 27, 2024

Via Electronic Mail ([planuniversity@san Diego.gov](mailto:planuniversity@san Diego.gov))

City of San Diego Planning Department  
202 C Street, M.S. 413  
San Diego, CA 92101

**Re: University Community Plan Update (CPU)**

To Whom It May Concern:

On behalf of a coalition of life science organizations, Biocom California is writing to request that the city adopt Urban Flex and Prime Flex land use designations and the EMX-1 zone in an area of the North Torrey Pines mesa. A graphic of the area is attached for reference purposes.

Biocom California would first like to thank planning department staff for their extensive efforts to bring the draft CPU forward. The CPU is an innovative, long-range plan that will govern and control the development of the University Community for the next 30 plus years and will help implement goals and policies relating to housing, climate, and quality of life.

What we are seeking for the North Torrey Pines mesa through appropriate land use designations and zoning will help the city meet these goals. This change can bring housing and jobs closer together and provide flexibility and creativity to further long-range development on the North Torrey Pines mesa, ensuring that it remains a vibrant national resource of health innovation.

North Torrey Pines is the crown jewel of the San Diego life science cluster because it is home to a high concentration of renowned research institutions and life science companies. These companies have made it clear that quality workforce housing near employers has become the number one factor in employee attraction and retention.

San Diego's main competitors, Boston/Cambridge and the San Francisco Bay Area, have long been providing mixed use and residential opportunities within their life science clusters, which is a major reason they are successful at both attracting companies and producing therapies, research tools, and diagnostics. San Diego needs to provide the same opportunities to remain competitive and continue to deliver life changing treatments and cures.

A significant amount of private investment has occurred on the North Torrey Pines mesa to foster walkability, micro-mobility, and connectivity to transit, along with providing the amenities and services that life science employees ask for. The industry is actively working with transit authorities to provide shuttle services to the Blue Line Trolley, COASTER, and rapid bus stations, and to increase bus frequency. The proposed Urban Flex designation and EMX-1 zone adds the critical third component of housing to pursue the city's goal of fostering communities where residents can live, work and play.

01-7



There are currently substantial land use constraints that limit development on all or most of the North Torrey Pines mesa, including the Coastal Height Limit Overlay Zone and MCAS Miramar Accident Potential Zone (APZ) II and Transition Zone (TZ). Such constraints will continue to govern and limit development regardless of the land use designation and base zone chosen for the area.

As such, making the change to Urban Flex with an EMX-1 implementing zone in the small requested area does not have a significant impact on the environmental analysis for the CPU. We have engaged a traffic consultant to undertake a preliminary analysis, which did not identify any impact to vehicle miles traveled (VMT) or other traffic impacts and should not cause a delay to the CPU review process. Based on final comment processing times for previous community plan updates such as Mira Mesa, this change should not present any challenge in being accomplished in this final phase.

If left unchanged, these zones will remain stagnant for two plan cycles, or more than 60 years, and this portion of the community will fall short of realizing the vision set forth in the Plan to create, *“A diverse and dynamic community with renowned higher education, healthcare, scientific research and technology institutions and businesses connected through a robust multi-modal transportation network to a vibrant, mixed-use urban core and varied residential neighborhoods, which protects its unique natural habitat and canyon systems.”*

The revised CPU was released on March 15 and we recognize that the CPU process is nearing completion. However, we believe it is critical that the city evaluate and incorporate this request into the CPU as it will govern development in the University Community for the next 30 years or longer. This change would help the city meet its climate and housing goals and facilitate the growth of the San Diego life science cluster in a way that increases its competitiveness while providing the housing proximity that employees are demanding.

Sincerely,



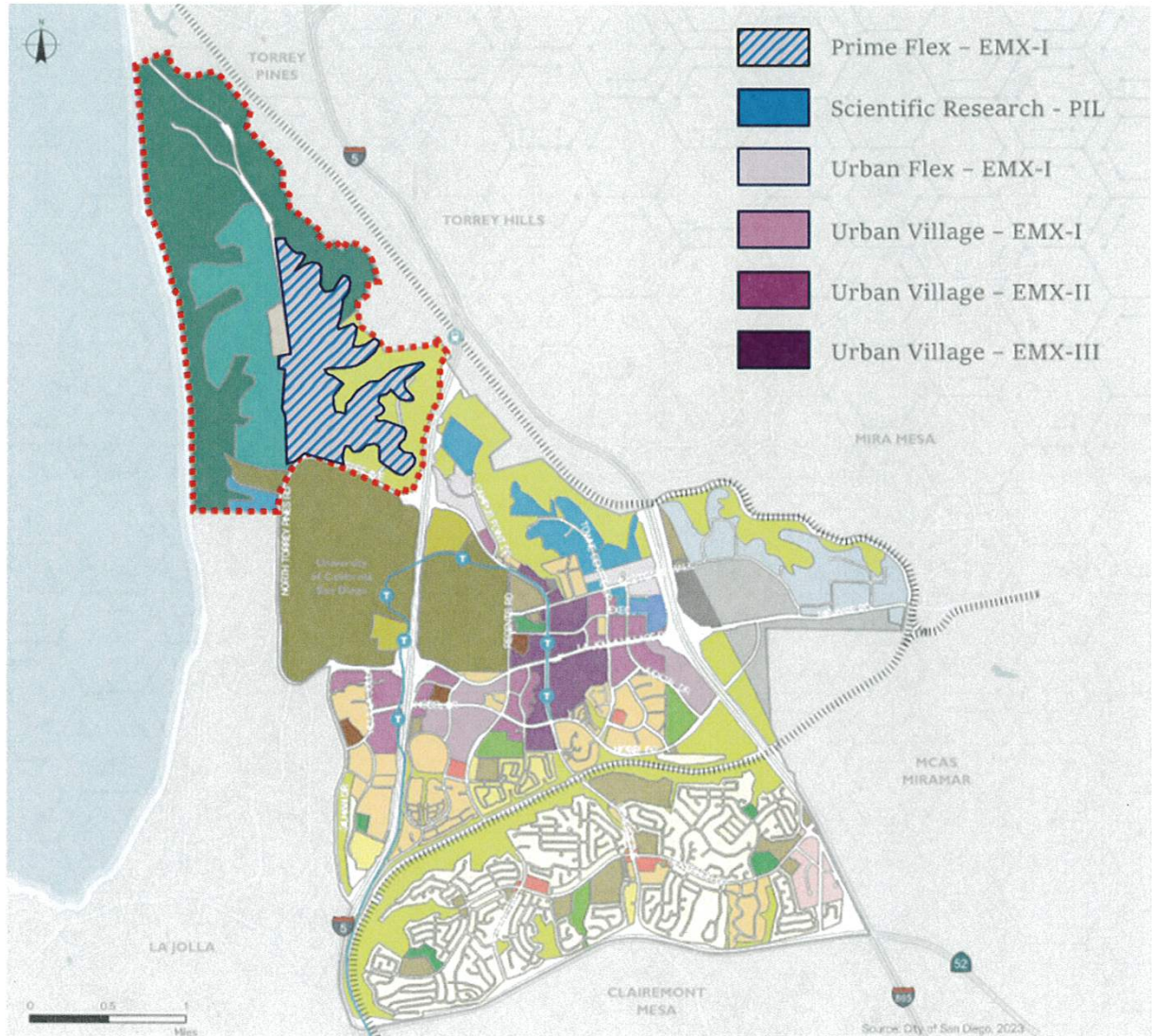
Melanie Cohn  
Sr. Director, Regional Policy & Government Affairs  
**Biocom California**

Attachment

cc: Honorable Mayor Todd Gloria ([MayorToddGloria@sandiego.gov](mailto:MayorToddGloria@sandiego.gov))  
Honorable Council President Sean Elo-Rivera ([SeanEloRivera@sandiego.gov](mailto:SeanEloRivera@sandiego.gov))  
Honorable Councilmember Joe LaCava ([JoeLaCava@sandiego.gov](mailto:JoeLaCava@sandiego.gov))  
Honorable Councilmember Kent Lee ([KentLee@sandiego.gov](mailto:KentLee@sandiego.gov))  
Heidi Vonblum, Planning Director ([VonblumH@sandiego.gov](mailto:VonblumH@sandiego.gov))  
Tait Galloway, Deputy Director, Community Planning & Housing ([TGalloway@sandiego.gov](mailto:TGalloway@sandiego.gov))

**(Proposed Land Use for North Torrey Pines)**

Conversion of Scientific Research/IP1-1 to Urban Flex and Prime Flex/EMX-1. Proposal indicated with diagonal cross hatch below in the North Torrey Pines Village area bounded by Genesee to the south.



**O1: Responses to Circulate San Diego Comment Letter**

**O1-1:** The introductory comment is noted. This comment does not relate to the adequacy of the Draft Program Environmental Impact Report (PEIR). No further response is required.

**O1-2:** Comment noted.

**O1-3:** The commenter appreciates the inclusion of the High Density Alternative in the Draft PEIR and agrees with the recognition of the alternative as an environmentally superior alternative in the alternatives section (Chapter 8) of the Draft PEIR. The comment is noted, and no further response is required.

**O1-4:** The commenter supports Urban Flex and Prime Flex land use designations in the North Torrey Pines area. These land uses are not proposed as part of the University Community Plan Update, but this suggestion has been noted by the City. These comments do not relate to the adequacy of the Draft PEIR. No further response is required.

**O1-5:** The comment is in general support of the proposed project. Comment noted.

**O1-6:** Comment noted. This comment reiterates portions of the comment letter from O1-1 through O1-5, and responses to those comments are incorporated here by reference.

**O1-7:** The comments from Biocom California are noted. These comments do not relate to the adequacy of the Draft PEIR. No further response is required.

## Comment Letter O2 - Climate Action Campaign

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] General Plan Amendment, Blueprint SD, and PEIR Climate Action Campaign Comments  
**Date:** Tuesday, April 30, 2024 9:27:11 AM  
**Attachments:** [Final CAC Comment Letter for 2024 Draft General Plan, Blueprint SD, Hillcrest FPA, University CPU, and PEIR.pdf](#)

---

**From:** Corinna Contreras <[corinna@climateactioncampaign.org](mailto:corinna@climateactioncampaign.org)>  
**Sent:** Monday, April 29, 2024 6:10 PM  
**To:** Blueprint San Diego <[BlueprintSD@sandiego.gov](mailto:BlueprintSD@sandiego.gov)>; PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** Catherine Walker <[catherine@climateactioncampaign.org](mailto:catherine@climateactioncampaign.org)>  
**Subject:** [EXTERNAL] General Plan Amendment, Blueprint SD, and PEIR Climate Action Campaign Comments

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

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Hello,

Please accept our comments on the General Plan Amendment, Blueprint SD, and PEIR.

Thank you,

Corinna Contreras (she/her)  
Policy Advocate  
Climate Action Campaign  
(619) 419-1222 ext 702

[www.climateactioncampaign.org](http://www.climateactioncampaign.org)

Twitter: [@sdclimateaction](#)

Instagram: [@sdclimateaction](#)

Facebook.com/ClimateActionCampaign

Like what we do? Support Climate Action Campaign today.

Our mission is simple: create a zero carbon future through effective and equitable policy action.



April 29, 2024

The City of San Diego  
Planning Department  
Attn: Heidi Vonblum  
202 C Street, M.S. 413  
San Diego, CA 92101  
via Email [blueprints@san-diego.gov](mailto:blueprints@san-diego.gov) and [planningceqa@san-diego.gov](mailto:planningceqa@san-diego.gov)

**Re: General Plan Amendment, Blueprint SD, and PEIR Climate Action Campaign Comments**

Climate Action Campaign (CAC), is a non-profit organization based in San Diego and Orange County, CA with a simple mission: create a zero carbon future through effective and equitable policy action.

San Diegans deserve access to high quality, sustainable, reliable, and affordable housing and transportation networks that are connected to important resources like schools, high road high wage jobs, healthcare centers, grocery stores, and recreation.

The current draft form of the General Plan Amendment referred to as Blueprint SD Initiative (Blueprint SD), Hillcrest Focused Plan Amendment (FPA), University Community Plan Update (CPU) as well as the draft Program Environmental Impact Report (PEIR) do not demonstrate a land use growth strategy that will address the sustainable and net zero greenhouse gas (GHG) emissions future Climate Action Plan (CAP) 2.0 legally promises to all residents.

CAC stands firm in its commitment to ensure the city achieves net zero emissions and 50% mode shift to walking/rolling, cycling, and public transit by 2035, therefore we insist on a Blueprint SD, Hillcrest FPA, University CPU and PEIR that helps the city of San Diego attain critical CAP milestones.

**Natural Gas and Building Decarbonization**

O2-1



Natural gas used as a source of energy is unsafe and aids in the deterioration of our climate. CAP 2.0 set guidelines for reducing GHGs from natural gas in Strategy 1. The decarbonization of new development is foundational to achieving GHG reductions set in CAP 2.0.

Gas stoves and heating/cooling systems are just a few appliances that utilize natural gas. The use of these appliances indoors creates a hazardous secondary condition; the air pollution generated by burning fossil fuels indoors significantly impacts residents and workers health leading to significant health disparities between those with electric appliances and those powered by natural gas.

The City of San Diego emissions GHG inventory for 2019 shows 18% from natural gas. Blueprint SD does not, at the time of its drafting, implement performance measures nor does it set the bare minimum threshold of no more natural gas for new development. In fact, the PEIR states, “new development occurring under the project may result in the need for new electric and natural gas transmission lines....” And it cites “residential consumption of natural gas for heating and cooking is the second highest percentage....”

O2-2

Without the adoption of a City Building Electrification policy that sets performance standards, reduction in GHG emissions from natural gas will not be met. While the Zero Emissions Municipal Buildings & Operations Policy (ZEMBOP) aids the city in removing natural gas from new municipal facilities, without creating and adopting a policy that helps move the city towards reductions in natural gas use in residential and commercial buildings, GHG emissions will continue to grow.

Higher density development will not result in “less energy” consumption as stated in the PEIR unless there are regulatory mechanisms to incentivize the development of all electric buildings. In fact, the PEIR admits that “as new development is constructed, new or renovated buildings would use electricity and natural gas to run various appliances and equipment, including space and water heaters, air conditioners, ventilation equipment, lights, and numerous other devices. Generally, electricity use is higher in the warmer months due to increased air conditioning needs, and natural gas use is highest when the weather is colder as a result of high heating demand.” The impacts would certainly be found significant with the addition of more natural gas in new developments. The PEIR however, inaccurately states the impact would be “less than significant.”

O2-3

CAC insists that this inaccuracy be rectified in the current draft of Blueprint SD, Hillcrest FPA, University CPU and the PEIR. Without this change, the public has no transparency of the PEIR’s impact on increasing GHG emissions and the city will certainly not achieve net zero emissions by 2035.

### **50% Mode Shift by 2035**

CAP 2.0 set the stage for the reduction of GHG emissions from the most GHG intense sector, transportation. The creation of land use and mobility actions and policies are critical first steps

O2-4

but these alone will not help the city achieve its CAP goal of shifting all trips to 50% non-vehicular. Blueprint SD and DEIR are negligent regarding mobile source emissions.

Blueprint SD and PEIR need to be consistent with CAP Strategy 3. The impact analysis of greenhouse gas emissions highlights the discrepancy between the PEIR and CAP 2.0. The cornerstone of Strategy 3 is the Mobility Master Plan (MMP). In its current draft form, the MMP is not sufficient to reach CAP mode share targets of 50% of all trips via walking/rolling, cycling, and public transit. The MMP does not benchmark for annual progress for these targets. The 135 project prioritization list falls short of implementing mobility projects as many of the projects are not shovel ready and lack funding. The Land Use and Community Planning Element and the Mobility Element of the General Plan Amendment and the PEIR do not take into account the increase of GHG emissions from transportation and the significant GHG impact growth and land use will have under the status quo.

This is detailed in the modeling done in the memo titled “Making Progress Toward Mode Share Goals” that is additional material for the draft Blueprint SD. The three model runs illustrate the discrepancy between CAP mode share targets and Blueprint SD. Even when projected to 2050, under the best case scenario, the vehicular total would be 72.3%. The CAP calls for 50% vehicular total by 2035.

O2-4  
cont.

Daily Mode Choice	Climate Action Plan (2035 Target)	Model Run 1 (2050) <sup>1</sup>	Model Run 2 (2050) <sup>1</sup>	Model Run 3 (2050) <sup>1</sup>
Walk	25%	13.8%	15.3%	16.8%
Bike	10%	2.6%	2.8%	3.0%
Transit	15%	7.3%	7.5%	7.9%
Vehicular (Total)	50%	76.4%	74.5%	72.3%
Vehicular (High-Occupancy Vehicle)	None	37.9%	37.0%	36.0%
Vehicular (Single-Occupancy Vehicle)	None	38.5%	37.5%	36.3%

<sup>1</sup> Model run 1, 2 and 3 apply additional dwelling units to the existing dwelling units in 2022 within Blueprint identified priority areas. The model runs also adds commensurate citywide increases to employment and enrollment.

The vehicular mode share data in this table is an important first step in assessing mode shift targets however it falls short of the type of comprehensive mode share data needed to plan growth in a more sustainable manner. This table only addresses land use. It is silent on mode share projections from various mobility policies, programs, and projects that are discussed in the draft MMP. The MMP needs a projected mode share table such as this for testing the general mode shift if MMP projects, policies, and programs are implemented.

In the draft MMP, Figure 6-7 displays the MMP Focus Areas. There are 11 focus areas. In comparing the Mobility Element Figure ME-18, the Land Use and Community Planning Element Figure LU-1, and MMP Figure 6-7, there are some overlaps between Village Propensity, current

O2-5



mobility infrastructure and transit service, and future MMP focus area projects. The issue remains that between the MMP focus areas and high level Village Propensity areas there are little to no strategies, policy, programs, projects that help facilitate mobility options outside of driving. Due to the lack of these planning documents accounting for more vehicular traveling, there is absolutely no way that impacts associated with GHG emissions should be considered as less than significant.

O2-5  
cont.

Blueprint SD and the PEIR need to have mode share modeling that includes both land use and mobility projects, policies, and programs. The latter should be part of the MMP as the MMP should feed into Blueprint SD and the PEIR. CAC insists this discrepancy is rectified.

### **Conclusion**

While steps have been taken to address growth and development within the CAP framework, the scope is too limited. The potential of new development to include natural gas would have significant impacts on the city's ability to achieve its 2030 and 2035 CAP targets for reducing GHG emissions via elimination of fossil fuels in the form of natural gas for residential and commercial development.

As the number one contributor to GHG emissions, transportation emissions will have a significant impact on GHG emissions if the growth and development in Blueprint SD and the PEIR do not include GHGs from increased vehicular use in the absence of implemented mobility options. The MMP does not include mode share data for the focus areas and the SANDAG Regional Transportation Plan falls short of meeting the city's mobility needs between now and 2050 as was detailed in CAC's [Missing the Mark](#) report. More must be done to create reliable, sustainable, and affordable mobility options to reach CAP 2.0 GHG reduction targets. These documents do not meet the needs of the city.

Blueprint SD and the PEIR need to be reconfigured with transparency and accountability for achieving CAP 2.0 targets.

Sincerely,

Corinna Contreras  
Policy Advocate  
Climate Action Campaign

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**O2: Response to Climate Action Campaign Comment Letter**

**O2-1:** Introductory comment noted. As discussed in Chapter 3.0 of the Draft Program Environmental Impact Report (PEIR), a key objective of the project is to align the City's land use plan with the goals of the Climate Action Plan (CAP). As detailed in Section 3.5.1 of the Draft PEIR,

"The Blueprint SD Initiative includes a comprehensive amendment to the General Plan to better align the City of Villages Strategy to reflect the latest goals, policies, and plans for housing, environmental protection, and climate change adaptation and sustainable growth. The Blueprint SD Initiative would amend the General Plan to reflect an updated citywide land use and policy framework designed around the 2050 regional transportation network to promote reductions in per capita greenhouse gas (GHG) emissions and vehicle miles traveled (VMT). The Blueprint SD Initiative identifies complementary land use, transportation, and related policies to support future development according to the revised land use framework. The land use and policy amendments would build upon climate goals outlined in the CAP and Climate Resilient SD Plan."

The project has been designed with a land use and mobility network that would reduce VMT per capita to the maximum extent feasible to achieve GHG reductions goals of the CAP (see Appendix N of the PEIR). While the project supports CAP implementation, this project alone is not intended to demonstrate a net zero GHG emissions future, as no plan alone, with no additional actions can do so. The City anticipates adoption of future actions, programs and regulations that implement the CAP, as well as implementation of VMT-reducing capital project investments. The Blueprint SD Initiative sets a framework supporting future City actions to achieve the net zero goals of the CAP. The environmental impacts of the CAP were addressed in the Final PEIR for the CAP (Project No. 416603 /SCH No. 2015021053), and the environmental impacts of the 2022 CAP Update and CAP Consistency Regulations were addressed in the Final Addendum to the CAP PEIR for the 2022 CAP Update (Project No. 416603/SCH No. 2015021053).

**O2-2:** Comment noted. See response to comment O2-1 and O2-3.

**O2-3:** Refer to response to comment O2-1. The analysis correctly applies the City's CEQA thresholds of significance for GHG and concludes impacts would be less than significant based on project consistency with the CAP and key CAP and General Plan policies. The project does not preclude future actions to limit natural gas in new developments that may be needed to achieve CAP goals. Adoption of prohibitions on natural gas and an adoption of a City Building Electrification Policy is outside of the scope of the project. Additionally, Section 4.5.4 of the Draft PEIR states that "future projects facilitated by the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be required to meet the mandatory energy requirements of the California Green Building Code (CALGreen; Title 24, Part 11 of the California Code of Regulations [CCR]) and the Energy Code (Title 24, Part 6 of the CCR) in effect at the time of issuance of a building permit. Adherence to the state mandatory energy requirements would reduce future operational impacts in regard to energy resources.

**O2-4:** Comment noted. GHG impacts are discussed in Section 4.7.4, Issue 1 of the Draft PEIR. The method for determining significance as it relates to the project's consistency with the CAP is accomplished through evaluation of the project's consistency with General Plan policies LU-A.8,

ME-D.16, CE-J.2, and CE-J.3 and consistency with the CAP's strategies, specifically Strategy 3. Quantification of GHG emissions is not required for the project based on the City's CEQA Significance Determination Thresholds (2022). Pursuant to the City Planning Department's June 17, 2022, memorandum—Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Infrastructure Projects—the environmental analysis for plan- and policy-level documents such as the Blueprint SD Initiative, University CPU, and Hillcrest FPA should address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP. A key goal of the project is to support a shift in mode share. The focus of the project is to establish and update the General Plan, University Community Plan, and Uptown Community Plan's policy, land use, and mobility framework consistent with the CAP that would support GHG reduction goals and help meet CAP targets. The project is supportive of the CAP, and demonstrates a commitment to meet CAP goals. In fact, the Blueprint SD Initiative land use framework is based on a model that shows the areas of the City with the greatest propensity to achieve the City's mode share goals. Future City actions, such as the adoption of a Mobility Master Plan as suggested in CAP Strategy 3: Mobility and Land Use, would be needed to aid CAP GHG reduction targets. However, the City's Mobility Master Plan is not a part of this project and has not been adopted by the City. The commenters' comment on the draft Mobility Master Plan have been noted. It is important to note that a land use framework alone cannot feasibly achieve GHG reductions and shift mode share. On a very simplified level, to achieve the desired mode shift, there must be a land use framework that supports investments in walking/rolling, biking and transit, and then the corresponding investment in that infrastructure. The Blueprint SD Initiative provides the land use framework and includes policies that would support the necessary infrastructure investment to ultimately achieve the mode share and GHG reduction goals. This information is detailed in the Draft PEIR Section 4.7 related to GHG emissions. See also response to comment O2-1 and response to comment O11-8 under comment letter O11.

**O2-5:** Comment noted. GHG emissions are discussed in Section 4.7 of the Draft PEIR. Mode share modeling is not required per CEQA but has been included as Appendix N of the Draft PEIR. While the Blueprint SD Initiative focuses on land use changes and growth, the Mobility Master Plan, a separate project, will continue to build off those established transportation and land use relationships acknowledged in Blueprint SD Initiative. See response to comment O2-4.

## Comment Letter O3 - Forest Advisory Board

**From:** [Jim Smith](#)  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** [EXTERNAL] Blueprint comment on trees  
**Date:** Sunday, April 28, 2024 8:42:34 PM

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I appreciate all of the attention on trees.

- My first suggestion is to put more effort into measuring where the city is relative to goals. The climate action plan calls for an aggressive goal of 35% canopy by 2035. However, the city hasn't measured tree canopy in a decade. The city has planted thousands of trees but there is no follow-up to know which trees are still living or why. Data is scattered in many different formats. So, the city should invest in a modern system of tracking progress towards the great goals that exist. Much of this is in the draft Climate Action Implementation Plan Measure 5.2.
- More tree code enforcement is needed. Development Services permits eight times more trees than the transportation & parks departments combined. Yet there is no follow-up to know if those trees were planted or most importantly survived.
- City tree codes should be revised. Developers do the minimum preparation required to plant a tree even when the horticulturist knows that the tree will be stunted and dead in a decade. To get the benefits of trees we need mature trees.
- Increase focus on native trees and shrubs. Conservation Element A11 mentions natives and that they should be planted for their drought tolerance. Many foreign species will provide drought tolerance but the native species provide ecological services for insects, pollinators, reptiles, and birds.
- More fruit trees. I commonly get asked about fruit trees. Especially in food deserts in economically challenged areas. The city might consider giving away a limited selection of fruit trees to designated communities along with educational material on how to care for the trees.

O3-1

Best regards,  
Jim Smith  
Chair of San Diego's Community Forest Advisory Board

**O3: Response to Forest Advisory Board Comment Letter**

**O3-1:** Comment noted. Comments relating to tracking progress and data collection, tree code enforcement, tree codes, increased focus on native trees and shrubs, and encouraging fruit trees are outside of the scope of the project. The comment does not raise an issue regarding the adequacy of the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter O4 - Friends of Rose Canyon

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: SMW/Friends of Rose Canyon comments on Blueprint SD/UCP Draft PEIR  
**Date:** Tuesday, April 30, 2024 9:33:00 AM  
**Attachments:** [image001.png](#)  
[SMW-FRC Comments on DPEIR for Blueprint San Diego 4.29.2024.pdf](#)

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**From:** Kristi Bascom <[kbacom@smwlaw.com](mailto:kbacom@smwlaw.com)>  
**Sent:** Monday, April 29, 2024 11:18 PM  
**To:** [PLN\\_PlanningCEQA](mailto:planningceqa@sandiego.gov) <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** Heather M. Minner <[Minner@smwlaw.com](mailto:Minner@smwlaw.com)>  
**Subject:** [EXTERNAL] SMW/Friends of Rose Canyon comments on Blueprint SD/UCP Draft PEIR

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City of San Diego Planning Department,

On behalf of our client, Friends of Rose Canyon, please find attached to this email comments from this firm on the [Draft Program EIR for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update.](#)

Please confirm receipt of this email and let me know if you have any trouble accessing the attachment.

Kind regards,  
Kristi Bascom



Kristi Bascom  
Urban Planner  
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O4-1

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& WEINBERGER LLP

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HEATHER M. MINNER  
Attorney  
Minner@smwlaw.com

April 29, 2024

**Via Electronic Mail Only**

City of San Diego  
Planning Department  
E-Mail: [planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)

Re: Comments on Draft Program EIR for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update

Dear City of San Diego Planning Department:

This firm represents Friends of Rose Canyon in matters related to the University Community Plan and Local Coastal Plan Update (“UCP Update”), Blueprint San Diego, (collectively the “Project”) and the City’s associated environmental review for adoption of the proposed Project, the Draft Program EIR for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update (“DPEIR”).

There are several changes in the draft UCP Update that will place the City on good footing to protect critical natural resources. Friends of Rose Canyon appreciates that the Draft UCP Update proposes to dedicate several City-owned properties as open space pursuant to Charter Section 55. Friends of Rose Canyon also appreciates that the Plan includes Multi Habitat-Planning Area (“MHPA”) boundary line corrections to add a total of approximately 25.97 acres of City-owned land into the MHPA and, critically, that approximately 2.70 acres of City-owned right-of-way traversing Rose Canyon, located within the MHPA, would be vacated and the MHPA conservation status changed from MHPA 75 percent conserved to MHPA 100 percent conserved. Likewise, Friends of Rose Canyon appreciates that the Plan adds park space at the dead ends of Regents Road. These are important measures to protect Multiple Species Conservation Plan (MSCP) lands, and special status species and their habitats and Friends of Rose Canyon fully supports these updates.

O4-1  
cont.



Friends of Rose Canyon is concerned, however, that the Draft UCP Update includes several proposed new and formalized trails within the MHPA. *See, e.g.* Draft UCP Update Figure 27, p. 130, and Project #32, p. 212 to 213. Trails within the MHPA cannot be proposed until the City has conducted recent, adequate biological surveys and a thorough environmental review, considered consistency with MSCP policies, prepared Resource Management Plans. We discussed these issues in detail in August 12, 2022 and June 30, 2023 letters to the City’s Planning Department (Attachments 1 and 2, attached hereto and incorporated herein).

In an April 15, 2024 email to our client, after the City released the draft UCP Update, the City’s Community Planning Program Manager stated that “we are removing proposed/ existing informal trails from the trails map in the draft plan. We had updated policies in the plan to reflect feedback, however had missed the map (apologies).”

Currently, the DPEIR is wholly deficient for failing to analyze the biological impacts associated with the proposed new and formalized trails in MHPA lands. These legal deficiencies, however, would be largely corrected if the City indeed entirely removed the proposed trails in the final Draft UCP Update figures, maps, and text.<sup>1</sup> We hope that the City will do so, as indicated, in the Final UCP Update. Because the trails are currently in the draft plan and DPEIR, to assist with the removal, we detail the DPEIR’s legal deficiencies below, in order to submit these comments within the 45 day comment period.

On behalf of Friends of Rose Canyon, we respectfully submit these comments to ensure that the City’s decision-makers fully comply with the California

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<sup>1</sup> This includes removing references to the proposed trails in the Draft UCP Update on Figure 27 and the textual reference on page 130, as well as Project number 32 on page 212 and 213 that recommends constructing new trails within Rose Canyon. The City has not yet determined if *any* new trails can be constructed within Rose Canyon consistent with the MSCP, in part because they have not prepared area-specific management directives such as a NRMP. Project number 32 should instead refer to closing existing informal trails, as required by the MSCP. The DPEIR must also be revised to remove Figure 3-26 and the textual reference on page 3-63. In addition, trails in the MHPA are referenced or depicted on the following pages of the Draft UCP Update: 50 (Figure 6), 110 (Figure 20), 82/83, 84/85, 86/87, 88/89, 90/91, 92/93, 94/95, 96/97, 98/99, and 100/101. Any other references to establishing new or formalizing existing informal trails in the MHPA in the Draft UCP, the DPEIR, and the Draft Blueprint San Diego must also be removed.

O4-2

Environmental Quality Act (“CEQA”), Public Resources Code § 21000 *et seq.*, and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 *et seq.* (“CEQA Guidelines”). After carefully reviewing the DPEIR for the Project, we have concluded that the DPEIR fails to comply with CEQA in numerous respects.

We are also submitting comments prepared by a third-party expert biologist retained by Friends of Rose Canyon, Robert Hamilton at Hamilton Biological, to review and comment on the Project and the DPEIR. Hamilton Biological’s report, dated April 27, 2024, is attached to this letter as Attachment 3 and incorporated herein by reference. The report also constitutes independent comments to the City by Robert Hamilton on the inadequacy of the DPEIR. Incorporated herein by reference are previous comments provided to the City by Robert Hamilton, dated June 30, 2023 and July 7, 2023, included as Attachments 4 and 5 to this letter.

O4-2  
cont.

An EIR is “the heart of CEQA.” *Laurel Heights Improvement Ass’n v. Regents of Univ. of Cal.* (1988) 47 Cal.3d 376, 392. It is “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return. The EIR is also intended ‘to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.’ Because the EIR must be certified or rejected by public officials, it is a document of accountability.” *Id.* (citations omitted).

Where, as here, the DPEIR fails to fully and accurately inform decision-makers, and the public, of the environmental consequences of proposed actions, it does not satisfy the basic goals of the statute. *See* Pub. Res. Code § 21061 (“The purpose of an environmental impact report is to provide public agencies and the public in general with detailed information about the effect that a proposed project is likely to have on the environment; to list ways in which the significant effects of such a project might be minimized; and to indicate alternatives to such a project.”)

O4-3

As a result of the DPEIR’s numerous and serious inadequacies, there can be no meaningful public review of the proposed Project. The City must revise and recirculate the DPEIR in order to permit an adequate understanding of the environmental issues at stake.

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## I. Species and Habitat Protection in the City of San Diego MSCP Subarea Plan

The City must recognize its legal obligations under the state and federal Endangered Species Acts when planning for and analyzing the impacts of the use of MHPA lands. We provide an overview of these obligations here.

In 1997, the City of San Diego finalized the MSCP Subarea Plan (“MSCP”) to meet the requirements of California’s Natural Communities Conservation Planning (NCCP) Act and to allow the City to issue take permits under the state and federal Endangered Species Acts. The Legislative purpose of NCCPs is “*to sustain and restore those species and their habitat identified by the department that are necessary to maintain the continued viability of those biological communities impacted by human changes to the landscape.*” Fish & Game Code § 2800(i). NCCPs achieves this by allowing development over some habitat in exchange for conserving larger habitat areas where viability can be maintained. As the Legislature explained “Natural community conservation planning promotes coordination and cooperation among public agencies, landowners, and other private interests, provides a mechanism by which landowners and development proponents can effectively address cumulative impact concerns, *promotes conservation of unfragmented habitat areas, [and] promotes multispecies and multihabitat management and conservation.*” *Id.* § 2800(d).

O4-4

Similarly, as the U.S. District Court for the Southern District of California has emphasized, the Federal Endangered Species Act establishes a strict conservation and recovery standard for listed species and measures implementing the City of San Diego’s MSCP Subarea Plan must be adequate to actually achieve that standard. *Southwest Center For Biological Diversity v. Bartel* (S.D. Cal. 2006) 470 F.Supp.2d 1123-24.

As the MSCP itself explains that “the overarching MSCP goal is to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats, thereby preventing local extirpation and ultimate extinction, and minimizing the need for future listings, while enabling economic growth in the region.” MSCP at 49.

The MSCP sets out to achieve this goal (and authorize development in unreserved lands) by establishing the Multi-Habitat Planning Area (MHPA), which “delineates core biological resource areas and corridors targeted for conservation.” MSCP at 1. Rose Canyon is one of these critical conservation areas, among others. This context helps explain why development within MHPA lands is extremely limited and is only allowed to the extent consistent with maintaining and conserving the protected biological resources. We discuss these limits in detail below.

**A. The MSCP Requires the City to Prioritize Protection of Biological Resources**

The creation of the MHPA was not the end of the City’s legal obligations under state and federal Endangered Species Acts. The City is obligated, under the MSCP, to continually manage these lands to protect the conserved resources. As the MSCP emphasizes, “management is necessary to continue to ensure that the biological values are *maintained over time*, and that the species and habitats that have been set aside are *adequately protected and remain viable*.” MSCP at 49.

The MSCP establishes core objectives that the City’s management of MHPA lands must achieve “to assure that the goal of the MHPA is attained and fulfilled.” *Id.* Specifically, management must:

1. “*ensure the long-term viability and sustainability of native ecosystem function and natural processes throughout the MHPA.*”
2. “*protect the existing and restored biological resources from intense or disturbing activities within and adjacent to the MHPA while accommodating compatible public recreational uses.*”
3. “*enhance and restore, where feasible, the full range of native plant associations in strategic locations and functional wildlife connections to adjoining habitat in order to provide viable wildlife and sensitive species habitat.*”
4. “*facilitate monitoring of selected target species, habitats, and linkages in order to ensure long-term persistence of viable populations of priority plant and animal species and to ensure functional habitats and linkages.*”
5. “*provide for flexible management of the preserve that can adapt to changing circumstances to achieve the above objectives.*”

The City’s current management of MHPA lands, and Rose Canyon in particular, is falling woefully short of these objectives. To begin with, the City has not conducted site-specific biological resource assessments or developed management directives to ensure the long-term viability of protected ecosystems. Further, the City’s lack of enforcement against off-trail use and the creation of illegal trails is failing to protect existing biological resources. And the City is not restoring those resources that have been disturbed by unauthorized uses. For a discussion of these current, degraded conditions see Hamilton Biological report

O4-5

O4-6

pages 10-12 (discussing numerous illegal trails through sensitive resources, Attachment 3). Finally, while the MSCP imposes ongoing monitoring requirements on the City (MSCP page 96), it has failed to conduct monitoring of MHPA lands in the UC Plan area, even before proposing the new trails in this UCP Update.

O4-6  
cont.

In light of the degradation currently occurring in protected MHPA lands, the City must focus its efforts on meeting the MSCP's management objectives for current use of these areas. It must not expand and intensify use of Rose Canyon and other MHPA lands by proposing new trails, when the use of existing trails already threatens protected ecosystems.

Further, as the MSCP's second management objective makes clear, recreational uses in MHPA lands are only allowed where they are compatible with protecting existing and restored biological resources. The MSCP's description of management policies for Urban Habitat Lands, such as Rose Canyon, states as follows: "The optimum future condition for the urban habitat lands scattered throughout the City of San Diego is a system of canyons that provide habitat for native species remaining in urban areas, "stepping stones" for migrating birds and those establishing new territories, and environmental educational opportunities for urban dwellers of all ages."

O4-7

These areas were not intended to serve as commuter corridors or to host uses that would impact protected habitats and covered species. The Hamilton Biological Report discusses fragmentation, edge, and recreation/trail effects that caution against any intensified use of MSCP Urban Habitat Lands. Hamilton Biological Report, pp. 21-25, Attachment 3.

With this regulatory background, we discuss a few of the DPEIR's most glaring legal inadequacies below.

## **II. The DPEIR Fails to Adequately or Accurately Describe the Project's Existing Biological Setting.**

It is essential that an EIR accurately and fully describe a project's environmental setting, because this description forms the baseline for evaluating the project's environmental impacts. *See* CEQA Guidelines § 15125(a). This requirement is crucial to a valid EIR: "[k]nowledge of the regional setting is critical to the assessment of environmental impacts . . . . The EIR must demonstrate that the significant environmental impacts of the proposed project were adequately investigated and

O4-8

discussed and it must permit the significant effects of the project to be considered *in the full environmental context.*” CEQA Guidelines § 15125(c) (emphasis added). In other words, it is impossible for an EIR to fulfill its informational purpose when it does not adequately describe the existing environment that may be impacted by a project.

Here, the DPEIP fails to provide basic information about the presence and location of sensitive biological species within MHPA lands, and some of the information it does provide is flatly inaccurate.

The Hamilton Biological report describes how the DPEIR provides inadequate and erroneous information on locations of special-status plant and wildlife species. *See* Hamilton Biological report, Attachment 3, pages 19-20. For instance, the DPEIR fails to provide information on where various special-status species are known or expected to occur within the UCP area. Instead, all the DPEIR does is state *whether* the species might occur within this entire planning area, not where it would occur. Further, the DPEIR fails to acknowledge that certain endangered species, such as the Least Bell’s Vireo, are present at all. The City has failed to provide even basic, readily available information about the location of sensitive species. For instance, Hamilton Biological explains that the DPEIR failed to provide maps from the California Natural Diversity Data Base (“CNDDDB”) showing the locations of the Project area where special-status species have been documented. *Id.* at 20.

O4-8  
cont.

In addition, Figure 29 in the DPEIR incorrectly identifies the MSCP Core Biological Resource Area Corridor running north/south on the wrong side of I-805. It should be on the east side of I-805, where there is open space (the west side is developed).

The City must revise and recirculate the DPEIR to provide adequate information about the biological environmental setting. Without this information, it is impossible for the document to provide an accurate analysis of the Project’s biological impacts.

O4-9

### III. The DPEIR Fails to Adequately Analyze Biological Impacts

The Draft UCP Update, Figure 27 (current and Proposed Trail Facilities) lists three entirely new trails and four formal trails in the location where existing illegal trails currently exist. Figure 27 notes that the exact location for the entirely new trails will be determined later. But the maps are actually specific about the locations within MSCP areas where the new trails would be located—within certain side-canyons or connecting to specific roads and informal trails. And of course, the exact location of the proposed

O4-10



formalized trails along existing informal trails is known. While “exact alignments” of the new trails within the marked locations may still be developed in the design phase, in fact, it is not feasible to place *any* trail within the areas marked for the topographic, biological, and legal reasons discussed herein and in our August 12, 2022 and June 30, 2023 letters, attached to this letter as Attachments 1 and 2, and incorporated herein by reference.

O4-10  
cont.

Despite the fact that the Project proposes specific new and formalized trails in specific locations, the DPEIR entirely refuses to analyze the impacts of these trails—at *any* level of detail. This omission violates core CEQA principles and black letter law.

The PDEIR lists five thresholds for determining significant biological impacts. DPEIR, p. 4.3-52. The first asks if the Project would have a substantial adverse effect on certain (1) sensitive species, (2) sensitive habitats, and (3) wetlands. The fourth threshold asks if the project would substantially interfere with wildlife corridors or nursery sites. The fifth threshold asks if the Project would conflict with the provisions of the MSCP or other habitat conservation plans.

O4-11

CEQA sets a high bar for the City’s evaluation of the Project, and the DPEIR does not come close to clearing it. The “fundamental purpose of an EIR is ‘to provide public agencies and the public in general with *detailed* information about the effect which a proposed project is likely to have on the environment.’” *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 428 (emphasis added).

The DPEIR’s analysis of impacts to sensitive species illustrates the flaws for all of the first four thresholds. To begin with, despite the proposed trails being listed in the DPEIR’s Project description (page 3-63), the impacts analysis omits any discussion of these trails and assumes that no development or changes will occur within MHPA lands. For example, it states “Sensitive plant species habitat in the City is typically concentrated in areas designated as Open Space that may be located within the MHPA. Although development per the [Project] is anticipated to occur with urban areas that are already developed . . . the details of future site-specific projects are unknown at this time, and it is possible that some project areas my support sensitive plant species habitat.” DPEIR, p. 4.3-53.

O4-12

This statement is factually incorrect because the project *does* propose development outside of urban areas that are not developed. Further, these MHPA lands in support sensitive plant and animal species, and this fact is well known. The DEIR is thus fatally flawed for failing to analyze the impacts of the full proposed Project. *See San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal.App.4th 645, 654 (an

O4-13

agency is obligated to analyze the impacts from the whole of the project, and “not some smaller portion of it.”).

O4-13  
cont.

Having generally acknowledged that it is possible that some projects may impact sensitive species (even though the DPEIR assumes that this will occur from development outside MHPA lands), the DPEIR states that as projects are proposed in those areas “site specific surveys ... will be required to determine the potential occurrence of sensitive plant species in the project area [and] impacts would be mitigated and/or conserved in accordance with” existing plans. The DPEIR suggests that mitigation will “reduce” biological impacts, but does not disclose what those impacts would be or how much they will be reduced by. The DPEIR thus impermissibly delays any analysis of the specific proposed trails. *Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency* (2000) 82 Cal.App.4th 511, 535-36; *Cleveland National Forest Foundation v. San Diego Assn. of Govs.* (2017) 17 Cal.App.5th 413, 440-43 (“fact that more precise information may be available during the next tier of environmental review does not excuse [the agency] from providing what information it reasonably can now”).

The DEIR’s generic approach prevents the sort of environmental analysis that CEQA envisions. CEQA requires public agencies to evaluate a Project’s impacts to the extent “reasonably feasible.” CEQA Guidelines § 15151. An EIR must make a “good faith effort at full disclosure.” Here, however, the City has made no effort to disclose the location of species and habitats in relation to the proposed trails, or to analyze the impacts of the trails on those protected resources.

O4-14

The fact that the City is preparing a program-level EIR is no excuse for failing to analyze the impacts of the proposed trails. “The degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity which is described in the EIR.” CEQA Guidelines, § 15146; *Cleveland National Forest Foundation*, 17 Cal.App.5th at 426, 439 (rejecting agency argument that its CEQA analysis was sufficiently detailed for a program-level EIR.”).

Here, the Project proposes specific trails, and it is more than possible, and entirely reasonable, to collect and analyze information about existing biological conditions in those locations, as the expert biological report by Hamilton Biological discusses. Hamilton Biological Report, Attachment 3, pp. 19-20. Even where the Project proposes trails in Rose Canyon generally (Draft UCP Update pages 212 to 213), that provides sufficient information to analyze potential impacts to sensitive species and habitats known to be present in this Canyon. The DPEIR must consider impacts to these biological resources caused directly by construction of proposed trails, as well as by



increased illegal trail use resulting from the new trails, and the expected increased population in the University Community Plan Area.

O4-14  
cont.

This includes an analysis of the impacts to MSCP lands from densifying the “village” areas. Those village areas are along the edges of steep slopes and MSCP habitat. Densification will increase light, noise, human intrusion, invasives, and barriers to wildlife movement. Hamilton Biological’s expert report describes the well-documented fragmentation, edge, and recreation trail/effects that adversely affect protected biological resources. Hamilton Biological Report, Attachment 3, pp. 22-27.

By failing to analyze the direct and indirect impacts to biological resources, the DPEIR violates CEQA’s requirement for a detailed analysis of project impacts. In short, because the City failed to “find out and disclose all that it reasonably can” regarding the Project’s impacts on biological resources, it violated CEQA. *Berkeley Keep Jets Over the Bay v. Board of Port Cmrs.* (2001) 91 Cal.App.4th 1344, 1370 (“*Berkeley Keep Jets*”) (quoting Guidelines § 15144).

In an attempt to paper over this lack of analysis, the DPEIR baldly concludes that the first four biological impacts will be significant. DPEIR, pp. 4.3-62 to 63 (“at a program level of review it cannot be ensured that all impacts could be reduced to less than significant; therefore, impacts to [the protected species/resources] would be considered significant.”). Courts have rejected this sloppy approach, however. *Galante Vineyards v. Monterey Peninsula Water Mgmt. Dist.* (1997) 60 Cal.App.4th 1109, 1123 (“acknowledgement is inadequate”; “a sufficient degree of *analysis*” is required”) (emphasis added).

O4-15

For instance, in *Galante Vineyards*, plaintiffs challenged an EIR for dam and reservoir construction as inadequately addressing impacts on viticulture and horticulture. The EIR acknowledged that impacts from fugitive dust caused by additional traffic and construction would be “significant and unavoidable, even with mitigation measures.” *Galante Vineyards*, at 1123. The court determined that this acknowledgment of potentially significant impacts was inadequate, stating that an EIR should contain “a *sufficient degree of analysis* to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences.” *Id.* at 1123. The court thus concluded that the EIR’s discussion of impacts to viticulture were inadequate. *Id.* at 1124.

The DPEIR fails to comply with CEQA in the same respect as the EIR in *Galante Vineyards*. It cannot avoid analyzing the Project’s biological impacts by simply declaring those impacts to be significant.

Further, there is no guarantee of comprehensive future environmental review that will provide a detailed analysis of or consideration of alternatives or mitigation for, the Project’s biological impacts. Preparing a “program EIR” does not excuse a lax analysis; it necessitates an even more comprehensive review. Because CEQA “allows agencies to limit future environmental review for later activities that are found to be ‘within the scope’ of the program EIR,” once a program EIR is approved, “a court generally cannot compel an agency to perform further environmental review for any known or knowable information about the project’s impacts omitted from the EIR.” *Forest Foundation*, 17 Cal.App.5th at 425-26; *id.* at 440 (impacts not analyzed in a program EIR “may potentially escape analysis in a later tier EIR”).

O4-16

This is why it is so critical that the City remove discussion of proposed trails on MHPA lands from the UCP Update. At the very least the City must commit that no trails will be proposed until biological surveys and local-specific management directives are prepared. Otherwise, the City must fully analyze and consider alternatives and mitigation for the potentially significant biological impacts from these trails to sensitive species. There is no doubt that these impacts exist, *See* Hamilton Biological Report, Attachment 3, pages 2, 9, 12, 13, 17 (discussing potentially significant impacts on protected species from proposed trails). The public and decisionmakers, and the state and federal wildlife agencies, must be given this information.

**A. The Proposed Trails are Inconsistent with the MSCP**

The DPEIR’s fifth threshold for significant biological impacts asks whether the project would “conflict with the provisions of the MSCP, VPHCP” or other adopted conservation plans. The DPEIR, however, entirely fails to analyze the Project’s consistency with the policies and directives of the MSCP or VHCP. DPEIR, pp. 43.-63, 4.10-79 to 80. Instead, the DPEIR defers all analysis, stating that “future development within the project areas would be evaluated for compliance with the City’s MSCP [and other plans].” *Id.* It then concludes, in a circular manner, that because future projects will be required to comply with the MSCP and other plans, the Project would not conflict with such plans and this biological impact is therefore less than significant. *Id.* at 4.3-64, 4.10-80.

O4-17

Such an approach makes a mockery of this significance threshold. As discussed above, the City may not defer analysis in this manner. It must analyze consistency with the MSCP and other plans reflective of the level of detail in the Project. Here, the Project proposes *specific trails* through MHPA lands that are, in fact, not consistent with the MSCP.

The MSCP includes the following General Management Directive for Public Access Trails, and Recreation, Priority 1, Number 2 (MSCP, p. 52):

Locate trails, view overlooks, and staging areas *in the least sensitive areas* of the MHPA. Locate trails *along the edges of urban land uses adjacent to the MHPA*, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible *rather than entering habitat* or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary due to the typically heightened resource sensitivity in those locations.

The MSCP requires the City to comply with this and other Priority 1 Directives, which “protect the resources in the MHPA, including management actions that are necessary to ensure that Covered Species are adequately protected.” MSCP, p. 50.

In contravention of this Directive, the Project proposes new and formalized trails that are not “located along the edges of urban land uses adjacent to the MHPA.” *See* DPEIR Figure 3-26. Further, as explained in detail in the Hamilton Biological Report (Attachment 3, pages 2-17) and our June 30, 2023 letter (pages 3-9), these trails are in fact “entering habitat” and “sensitive areas,” locations prohibited by the MSCP.

The Project also conflicts with the MSCP’s Priority 1, General Management Directive 1 (MSCP, p. 52), which provides as follows:

Provide sufficient signage to clearly identify public access to the MHPA. Barriers such as vegetation, rocks/boulders or fencing may be necessary to protect highly sensitive areas. Use appropriate type of barrier based on location, setting and use. For example, use chain link or cattle wire to direct wildlife movement, and natural rocks/boulders or split rail fencing to direct public access away from sensitive areas. Lands acquired through mitigation may preclude public access in order to satisfy mitigation requirements.

While the Project proposes to close a handful of existing informal trails, it allows numerous other informal trails to remain in use. *See* DPEIR Figure 3-26, and Hamilton Biological Report, pp. 10-12. This conflicts with Directive 1, because it is not

O4-17  
cont.

proposing sufficient signage and barriers to protect highly sensitive areas, and direct public access away from those areas.

Further, proposing *any* new trails in Rose Canyon prior to preparing area-specific management directives (such as a Natural Resource Management Plan) for this Rose Canyon itself conflicts with the MSCP. *See* Implementing Agreement To Establish a Multiple Species Conservation Program (“MSCP”) for the Conservation of Threatened, Endangered, and other Species in the Vicinity of San Diego, California, section 10.4 (requiring the City to maintain protected lands “for habitat value” “until such time that area-specific management directives are formulated and applied to logical and discrete areas within the subarea Plan.”); MSCP p. 74 (requiring preparation of NRMP for natural resource parks); Hamilton Biological Report, Attachment 3, p. 27.

O4-17  
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#### **IV. Failure to Disclose Significant Land Use Impacts**

Because the proposed trails in MSCP lands conflict with the MSCP, as discussed above, the DPEIR also fails to disclose significant land use impacts under section 4.10 of the DPEIR. *See* DPEIR p. 4.10-80.

In addition, as described in the attached Hamilton Biological Report, the proposed trails will significantly impact sensitive biological resources, including vernal pools. The trails will also be located on steep hillsides that are not suitable for public access trails. *See* Hamilton Report, Attachment 3, p. 17. Accordingly, the Project will conflict with the City’s Environmentally Sensitive Lands Regulations, and VPHCP—significant impacts that the PDEIR fails to disclose. PDEIR p. 4.10-72.

#### **V. Inadequate Mitigation of Biological Impacts**

##### **A. The Biological Mitigation is Not Sufficiently Detailed**

The DEIR’s description of the Project’s mitigation lacks adequate detail to properly inform decision-makers and the public. CEQA requires that a lead agency adopt all feasible mitigation measures that can substantially lessen a project’s significant impacts. Pub. Res. Code § 21002. California courts have clarified that an EIR is inadequate where its proposed mitigation measures are so undefined that it is impossible to evaluate their effectiveness. *San Franciscans for Reasonable Growth v. City & County of San Francisco* (1984) 151 Cal.App.3d 61, 79. In particular, a mitigation measure must include criteria or performance standards against which the mitigation’s actual implementation can be measured. *See San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal.App.4th 645, 670 (“*County of Merced*”). The reader must be

O4-18

able to discern what steps will be taken to mitigate the project’s impacts. *Id.* Without such detail, there is no way for decision-makers and the public to weigh whether the proposed measures will sufficiently mitigate a project’s impacts, causing the EIR to fail in its core, informational purpose.

The DPEIR’s proposed biological mitigation fails to satisfy CEQA’s mandate, because it is vague, poorly-defined, and infeasible. The single mitigation measure for the Project’s numerous significant biological impacts vaguely provides as follows:

MM-BIO-1 – Impacts to Sensitive Biological Resources

Future projects that could directly and/or indirectly impact sensitive species, sensitive habitats and/or wetlands shall comply with the City’s Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans including, but not limited to, the City’s Multiple Species Conservation Program (MSCP) Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP) and shall implement avoidance, minimization, and mitigation measures in accordance with the City’s ESL Regulations, Biology Guidelines, and MSCP Subarea Plan and VPHCP.

This sweeping measure does not allow the public and decisionmakers to know what “avoidance, minimization, and mitigation measures” are contained in these plans or to evaluate their effectiveness in reducing significant biological impacts.

Moreover, these existing laws are insufficient to avoid significant biological impacts. For example, the City’s lack of area-specific management directives in a NRMP and drastically inadequate funding for monitoring and enforcement has led to illegal trail creation and use within Rose Canyon and associated significant biological impacts. As another example, measures must be proposed to avoid trail construction impacts during nesting seasons. Accordingly, additional measures must be considered and adopted here.

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## **B. The Biological Mitigation Impermissibly Delays Development Of Specific Mitigation Measures**

As a general rule, CEQA requires that the EIR fully describe a project’s proposed mitigation measures. CEQA prohibits deferral of mitigation, except in the following narrow circumstances: (1) there must be practical considerations that preclude development of the measures at the time of project approval, (2) the EIR must contain specific criteria to govern the future actions implementing the mitigation, and (3) the agency must have assurances that the future mitigation will be both “feasible and efficacious.” *Californians for Alternatives to Toxics v. Dept. of Food & Agric.* (2005) 136 Cal.App.4th 1, 17.

Conversely, deferral is not permitted “when an EIR puts off analysis or orders a report without either setting standards or demonstrating how the impact can be mitigated in the manner described in the EIR.” *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 280-81.

Here, the DPEIR fails to satisfy CEQA’s requirements because it relies on mitigation measures that are improperly deferred. It states that “Mitigation measures are provided at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific projects are proposed.” However, specific trails through sensitive biological habitats and where protected species are known to occur *are* being proposed in the UCP Update.

O4-20

In addition, the DPEIR fails to provide any performance standards for its deferred mitigation, or for evaluating whether compliance with existing plans would be sufficient mitigation. CEQA Guidelines § 15126.4(a)(1). Instead, it simply states that “MM-BIO-1 would be implemented to minimize and avoid impacts related to sensitive species, habitats, and wetlands *to the extent feasible.*” DPEIR, p. 4.3-64. “To the extent feasible” is not a legally adequate performance standard. *King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 857–859 (“The terms “increase” and “reduce”—even though preceded by the mandatory term “shall” and modified by the phrase “to the extent feasible”—are not specific performance standards.).

The DPEIR neither explains why deferral of mitigation for the significant biological impacts of these trails is necessary nor provides the criteria necessary to ensure that feasible and effective mitigation will be developed in the future. As discussed, the DEIR must contain a high level of detail now, both in analyzing impacts to protected biological resources in MHPA lands, and in developing alternatives and mitigation measures to avoid or lessen those impacts.



### **C. The Biological Mitigation is Misleading**

As it stands, the DPEIR misleads the public and decisionmakers into thinking that trails proposed in MHPA lands can be developed and significant biological impacts reduced through compliance with the MSCP. This is not correct. As discussed in detail above, it is not possible for the Project’s proposed trails to comply with the MSCP because they conflict with the Subarea Plan’s Priority 1 General Management Directive No. 2’s requirements for where trails are located. The DPEIR must acknowledge that compliance with this Mitigation Measure will prohibit the proposed trails from being constructed. *Mira Monte Homeowners Assn. v. County of Ventura* (1985) 165 Cal.App.3d 357, 365 (EIR protects “the right of the public to be informed in such a way that it can intelligently weigh the environmental consequences of a[] contemplated action”). Without doing so, the UCP Update erroneously assumes that additional trails will be constructed in Rose Canyon, and that these trails will provide additional Recreational Park Value. See Draft UCP Update page 212-213 (despite the fact that the City’s own policies make clear that “the Value Standard is not intended to be applied to . . . open space parks.”) (DPEIR, p. 4.13-5).

O4-21

### **VI. The DPEIR’s Analysis of Alternatives is Legally Flawed**

Every EIR must describe a range of alternatives to the proposed project and its location that would feasibly attain the project’s basic objectives while avoiding or substantially lessening the project’s significant impacts. Pub. Resources Code § 21100(b)(4); CEQA Guidelines § 15126(f). A proper analysis of alternatives is essential to comply with CEQA’s mandate that significant environmental damage be avoided or substantially lessened where feasible. Pub. Resources Code § 21002; CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(f); *Citizens for Quality Growth v. City of Mount Shasta* (1988) 198 Cal.App.3d 433, 443-45. Additionally, as stated in *Laurel Heights I*, “[w]ithout meaningful analysis of alternatives in the [D]EIR, neither the courts nor the public can fulfill their proper roles in the CEQA process. . . . [Courts will not] countenance a result that would require blind trust by the public, especially in light of CEQA’s fundamental goal that the public be fully informed as to the environmental consequences of action by their public officials.” 47 Cal.3d at 404. By contrast, this DPEIR fails to adequately identify, evaluate, and clearly present a comparison of the alternatives to the proposed Project.

O4-22

#### **A. The DPEIR Fails to Analyze a Reasonable Range of Alternatives.**

A “reasonable range” of alternatives should be guided by the purpose of offering substantial environmental advantages over the Proposed Project which may be

O4-23



“feasibly accomplished in a successful manner” considering the economic, environmental, social, and technological factors involved. *See Citizens of Goleta Valley v. Bd. of Supervisors* (1990) 52 Cal.3d 553, 564-66.

A fundamental mandate of CEQA is that “public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” Pub. Resources Code § 21002; see also *id.* § 21081. By examining a range of alternatives, the Lead Agency can demonstrate that it has taken a “hard look” at the project objectives to select alternatives that allow for meaningful comparison. See *Residents Ad Hoc Stadium Committee v. Bd. of Trustees* (1979) 89 Cal.App.3d 274, 287. This DEIR side-steps a thorough analysis of alternatives, as explained in the following sections.

CEQA Guidelines §15126.6(c) states: “The range of potential alternatives to the Proposed Project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed. The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency’s determination. . . . Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts.”

Here, the DPEIR did not include any alternatives (aside from the mandated no-project alternative), that would “substantially lessen” the significant environmental effects of the Project as CEQA required. Pub. Resources Code §§ 21002, 21081. Instead, the selected alternatives make only minor adjustments to the impacts of the Project, at times increasing some and reducing others. *See* DPEIR p. 8-4, Table 8-1 (Alternatives Comparison to the Project).

**B. Labeling the High Density Alternative as the Environmentally Superior Alternative is Misleading and Incorrect.**

A result of the DPEIR’s inadequate range of alternatives is that an alternative that would actually *increase* numerous project impacts is misleadingly labeled “the environmentally superior alternative.” Under CEQA, “if the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” CEQA Guidelines §

O4-23  
cont.

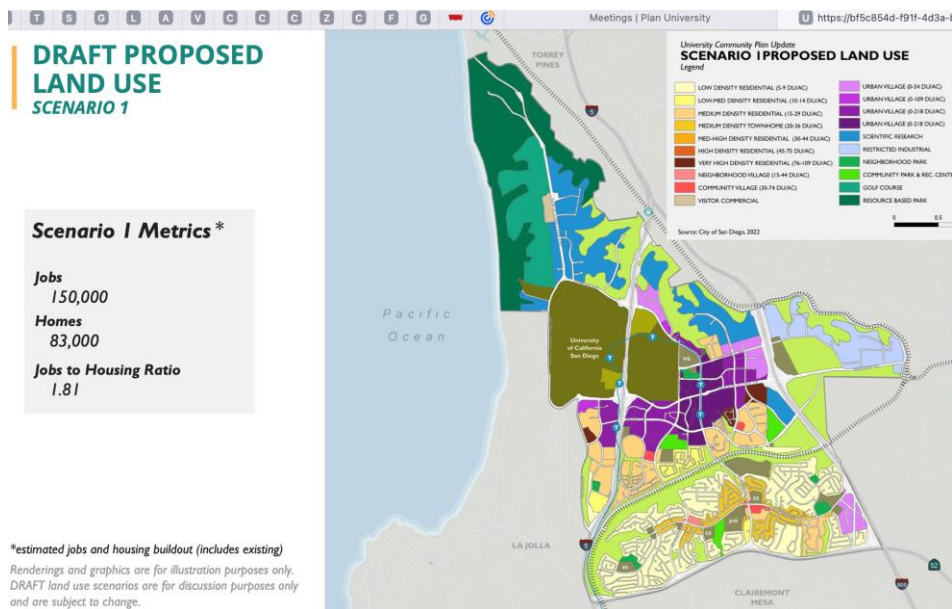
O4-24

15126.6 (e)(2). Because the DPEIR failed to include an alternative that actually substantially lessens the Project’s significant effects, the University Community Plan Update and Hillcrest Focused Plan Amendment High Density Alternative was selected as the claimed next-best alternative, making it the putative environmentally superior alternative. This is an entirely misleading label, however, because there are several alternatives that the DPEIR did not evaluate that would actually be environmentally superior to this high-density alternative.

In addition, based on the City’s own analysis the High-Density Alternative increases four of the Project’s significant impacts. Tellingly, this is the same number of impacts it decreases in the City’s analysis. DEIR p. 8-4. And in fact, the High-Density Alternative actually increases five significant impacts, because the City incorrectly concluded that its biological impacts would be the same as the Project’s. See subsection D, below. As a result, this alternative is not superior to the Project.

Further, the University High-Density Alternative was already rejected by the City as infeasible during the UCP update process (during which time the City called it Alternative 1, and presented it at numerous public meetings before withdrawing it). See, e.g., City’s presentation at Feb. 22, 2022 public meeting of the UC Plan Update Subcommittee Meeting, pasted below:

O4-24  
cont.



It thus should not have been included in the DPEIR’s alternatives analysis at all. CEQA Guidelines §15126.6(c) (“The range of potential alternatives to the

Proposed Project shall include those that could feasibly accomplish most of the basic objectives of the project.”).

O4-24  
cont.

**C. The DPEIR Must Include an Alternative that Substantially Lessens the Project’s Significant Effects, which Would Be a Proper Environmentally Superior Alternative.**

To comply with CEQA, and to provide decision-makers with the information they need, the DPEIR should have considered a range of alternatives that would reduce or avoid the Project’s impacts, and it should have selected from among these alternatives the environmentally superior project. Without this analysis, the public and decision-makers cannot make a fully-informed decision about whether or not the Proposed Project is worth its environmental consequences. If there are feasible alternatives that could provide some benefits while limiting the impacts, the public and the City deserve to know—and CEQA requires that the EIR inform them. The DPEIR fails to meet this obligation.

O4-25

The DPEIR should evaluate the Community Planning Group Subcommittee Input Scenario, which was based on extensive input from the Subcommittee and the community at large. *See* Discussion Draft UCP, PDF page 204-212, included after the end of the April 2023 Discussion Draft as numbered page 30-37. It would accommodate a reduced level of development: 22,000 new homes (compared to the 30,000 in the Draft Plan) and 55,000 new jobs (compared to 70,000 new jobs in the Draft Plan). This alternative would achieve the project objectives, and, because of its reduced development intensity, would reduce several significant Project impacts, including aesthetics, air quality, biological resources, hydrology, and water quality, among others.

**D. The DPEIR Fails to Discuss the City’s Rejection of Proposed Alternatives**

The Discussion Draft of the UC Plan included a map and description of the Community Planning Group Subcommittee Input Scenario Alternative and committed the City to studying this alternative during environmental review. *See* Discussion Draft UCP, PDF page 204-212, included after the end of the April 2023 Discussion Draft as numbered page 30-37 (“This scenario will be considered throughout the Environmental Review process.”). The DPEIR, however, contains no mention of the Community Planning Group Subcommittee Input Scenario, or explanation of why the City rejected it. This failure to address an alternative that the City considered and rejected violates CEQA. CEQA Guidelines §15126.6(c) (The EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the

O4-26

scoping process and briefly explain the reasons underlying the lead agency’s determination”).

O4-26  
cont.

### **E. The DPEIR Improperly Analyzed the Alternatives**

The DPEIR fails to adequately analyze and compare the biological impacts of the project Alternatives. For instance, because the No Project Alternative would not propose new trails in MHPA lands or increase the intensity of use in these areas, it would have a reduced biological impact compared to the Project. The DPEIR, however, concludes that the impacts would be the same, failing to recognize this difference. DPEIR p, 8-6.

Similarly, for the High Density Alternative, the DPEIR incorrectly concludes that this alternative would result in the same level of biological resource impacts as the project. DPEIR, p. 8-20. But this conclusion fails to account for the increased impacts from edge and recreation/trail effects that this Alternative would have on MHPA lands. *See* Hamilton Biological Report, Attachment 3, pp. 21-25. The High Density Alternative would increase these adverse biological impacts as a result of increased development intensity on property adjacent to MHPA lands and the intensified recreational use that would occur on MHPA lands as population increases while the City does not build other recreational facilities to serve that population. *See* DPEIR p. 4.13-9 (acknowledging that future developments could result in an increased use and deterioration of existing recreational facilities). This is another reason that this High Density Alternative is not, in fact, the environmentally superior alternative.

O4-27

### **VII. A Revised DPEIR Must Be Recirculated for Public Review and Comment.**

Because of the inadequacies discussed above, the DPEIR cannot form the basis of a Final PEIR. CEQA requires lead agencies to prepare and recirculate a supplemental draft “[w]hen significant new information is added to an environmental impact report” after public review and comment on the earlier draft EIR. Pub. Res. Code § 21092.1. The opportunity for meaningful public review of significant new information is essential “to test, assess, and evaluate the data and make an informed judgment as to the validity of the conclusions to be drawn therefrom.” *Sutter Sensible Planning, Inc. v. Sutter County Board of Supervisors* (1981) 122 Cal.App.3d 813, 822; *see also City of San Jose v. Great Oaks Water Co.* (1987) 192 Cal.App.3d 1005, 1017. An agency cannot simply release a draft report “that hedges on important environmental issues while deferring a more detailed analysis to the final [EIR] that is insulated from public review.” *Mountain Lion Coalition v. California Fish and Game Comm’n* (1989) 214 Cal.App.3d 1043, 1052.

O4-28

In order to cure the egregious flaws in the DPEIR identified in this letter, the City must obtain substantial new information to adequately assess the proposed Project's environmental impacts, and to identify effective mitigation and alternatives capable of alleviating the Project's significant impacts. CEQA then requires that the public be given a meaningful opportunity to review and comment upon this significant new information in the form of a recirculated DPEIR.

04-28

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Heather M. Minner

Attachments:

1. SMW letter to Heidi Vonblum, dated August 12, 2022
2. SMW letter to City of San Diego re Community Discussion Draft UCP, dated June 30, 2023
3. Biological comments prepared by Robert Hamilton, President of Hamilton Biological, Inc. dated April 27, 2024
4. Biological comments prepared by Robert Hamilton, President of Hamilton Biological, Inc. dated June 30, 2023
5. Biological comments prepared by Robert Hamilton, President of Hamilton Biological, Inc. dated July 3, 2023

04-29

# **Attachment 1**

August 12, 2022

**Via Electronic Mail Only**

Heidi Vonblum  
Planning Director  
City of San Diego Planning Department  
9485 Aero Dr, M.S. 413  
San Diego, CA 92123  
E-Mail: VonblumH@sandiego.gov

Re: The City Cannot Propose New Trails in Rose Canyon Open Space at this Time.

Dear Ms. Vonblum:

This firm represents Friends of Rose Canyon in matters related to the University Community Plan Update and the adoption of Blueprint San Diego, the City's General Plan Update.

Friends of Rose Canyon is a community-based organization dedicated to the protection, preservation and restoration of Rose Canyon and the Rose Creek watershed. It has an active Board of Directors and dedicated membership base. Since 2019, Friends of Rose Canyon Executive Director Deborah Knight has participated in the University Community Plan ("UCP") Update Subcommittee, which the City convened to include resident, business and non-profit organization representatives.

At a July 21, 2020 meeting of the Subcommittee, the Planning Department provided a status update on the project and information on open space, habitat, and trails. This presentation included a "Draft Proposed Trails Network" that, unfortunately, suggested proposing new and new formal trails within Rose Canyon as part of the UCP Update. Such a proposal, however, is premature under both state law and City policies.

The City of San Diego Multiple Species Conservation Program ("MSCP") and the City's recently approved Parks Master Plan requires the City to take additional steps before any new trail locations can be proposed for Rose Canyon. Specifically, the



City must adopt a Natural Resource Management Plan (NRMP) for Rose Canyon, and it must then engage in the planning process committed to for a Citywide Trails Master Plan.

As discussed in more detail below, because the City has not yet undergone these critical assessments, the Draft UCP Update released for public review cannot blindly propose new trails in Rose Canyon and other MSCP lands in the University Community Plan area. Instead it could include policy language reiterating that any new trail proposals for Rose Canyon and other MSCP lands in the Plan area must come after and be informed by a completed NRMP and the Trails Master Planning process.

**The City of San Diego must create and fund implementation of a reliable Natural Resource Management Plan for Rose Canyon to ensure that covered species are adequately protected.**

In 1997, the City of San Diego finalized a Multiple Species Conservation Program (MSCP) Subarea Plan to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act and to allow the City to issue take permits under the state and federal Endangered Species Acts. The City's Multi-Habitat Planning Area (MHPA) delineates core biological resource areas and corridors targeted for conservation as part of the Subarea Plan. The Subarea Plan document identifies Rose Canyon as one of these critical conservation areas.

Like other urban habitat areas within the MHPA, Rose Canyon provides habitat for native species and shelter for migrating species. The MSCP also protects habitat linkages that occur in the UC Plan area. In fact, the Subarea Plan document indicates that seventeen species covered under the MSCP are found in urban habitat areas such as Rose Canyon (MSCP, 1997). Several of these species are unique to San Diego County. Some of the species are classified as threatened. One, the Coastal California Gnatcatcher, is listed as federally threatened. It is found in both Rose Canyon and other MSCP lands within the UC Plan area. Preserving Rose Canyon's habitat and natural resources is essential to the survival of these covered species. The City must not propose further trail development that could jeopardize species survival and recovery.

The City must approach Rose Canyon with particular caution in light of its failure to comply with the Subarea Plan's requirements. The Subarea Plan calls for specific management policies for urban habitats—like Rose Canyon—that form part of a natural resource park. In fact, the Subarea Plan notes that the Park and Recreation Department “has prepared or is preparing a Natural Resource Management Plan for adoption by City Council to govern management of these lands.” (MSCP, 1997). Twenty-five years later, the City has yet to adopt such a plan for Rose Canyon. As a result, the

City has not identified appropriate management policies and has not conducted site-specific biological resource assessments. It may not expand uses within Rose Canyon until the requisite plan is complete and potential mitigation measures are assessed.

The failure to complete a Natural Resource Management Plan is exacerbated by the City's lack of monitoring, management, and enforcement of activities currently taking place in Rose Canyon. The natural resources that were intended to be protected through the MSCP process are not being properly safeguarded and are experiencing degradation due to unauthorized activities as well as erosion and invasive species. These impacts are evident throughout Rose Canyon and must be assessed in a Natural Resource Management Plan before adding additional impacts to this environmentally sensitive resource.

Indeed, as the U.S. District Court for the Southern District of California has emphasized, the Endangered Species Act establishes a strict conservation and recovery standard for listed species and mitigation measures in the City of San Diego's MSCP Subarea Plan must be adequate to actually achieve that standard. (*Southwest Center For Biological Diversity v. Bartel* (S.D. Cal. 2006) 470 F.Supp.2d 1123-24.) The court thus held that conservation measures within the City's MHPA cannot be "ineffective" or "untested." (*Id.*, 470 F.Supp.2 at 1141.)

The City's failure to develop and enforce a Natural Resource Management Plan means that it is relying on unevaluated and ineffective measures to preserve the habitat and natural resources of Rose Canyon. As *Bartel* indicates, this is impermissible. The City must assess existing resources and have a plan to properly manage and support covered species before it can consider expanding uses with new trails.

**Adopted City policies also require comprehensive assessments of resource conservation and use as part of the Trails Master Plan before new trails are proposed.**

In its recently-adopted Parks Master Plan, the City likewise emphasized that Natural Resource Management Plans and criteria and guidelines for establishing thresholds of access and use in MSCP lands must be prepared before new trails may be proposed for evaluation by the City. In particular, the City committed to the following specific policies:

**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 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.

The City’s adopted policies thus emphasize that new trails should not be proposed in open space parklands such as Rose Canyon before specific resource assessments and plans have been prepared. To propose new trails in Rose Canyon as part of the draft University Community Plan Update before those steps have been taken would run counter to these policies.

Ensuring that the UCP Update does not propose new trails uninformed by the required assessments is also consistent with your own commitments. When the Parks Master Plan was adopted on August 3, 2021, you assured the City Council that a comprehensive review of the state of San Diego’s MSCP lands would be incorporated into the Trails Master Planning process as a first step. This comprehensive review is critical. It will allow the City (with community input) to make informed decisions about what can and should be prioritized in order to provide the necessary habitat quantity, quality, and connectivity and the necessary resources for monitoring, management, and enforcement to support the viability of San Diego’s unique biodiversity .

\* \* \* \*

Friends of Rose Canyon appreciates your commitment to good planning, and is confident that you share the same goal of ensuring that Rose Canyon and other MSCP lands in the UC Plan area continue to be a community amenity and high-functioning habitat resource that fulfills the requirements of the MSCP. Completing a Natural Resource Management Plan for Rose Canyon and the planning process for the

Heidi Vonblum  
August 12, 2022  
Page 5

Trails Mater Plan are required steps before proposing new trails in Rose Canyon and other MSCP lands. Friends of Rose Canyon looks forward to discussing new trail proposals informed by these planning processes at those times.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Heather M. Minner

cc: Deborah Knight, Executive Director, Friends of Rose Canyon (via email)  
Nancy Graham, AICP, Development Project Manager, City of San Diego,  
Planning Department (via email)

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# **Attachment 2**

June 30, 2023

**Via Electronic Mail Only**

UCP Update Project Manager  
City of San Diego Planning Department  
9485 Aero Dr, M.S. 413  
San Diego, CA 92123  
E-Mail: planuniversity@sandiego.gov

Re: Comments on the University Community Plan and Local Coastal Plan Community Discussion Draft (April 2023)

Dear UCP Project Manager:

This firm represents Friends of Rose Canyon in matters related to the University Community Plan and Local Coastal Plan Update (“UCP/LCP Update” or “UCP”) and the adoption of Blueprint San Diego, the City’s General Plan Update.

Friends of Rose Canyon remains concerned about an issue that has been brought to the City’s attention before: the premature identification of new trails in Rose Canyon Open Space Park and other sensitive habitat areas within the UCP boundary. We provided a comment letter to Planning Director Heidi Vonblum dated August 12, 2022 regarding the “Draft Proposed Trails Network” that was presented at the July 21, 2020 meeting of the Subcommittee. In our letter, provided again as Exhibit A, we noted that proposing new (or formalizing illegitimate) trails within Rose Canyon, or other MSCP-designated properties, as part of the UCP Update is premature under both State law and City policies. However, the recently-released UCP Discussion Draft (April 2023) does just that. In fact, new trail locations are identified liberally throughout the UCP, including in Figures 5, 17, and 24 as well on illustrative graphics on pages 77-79, 81, 83-85, and 87-92. For several marked new trails, the UCP notes that the exact location will be determined later. But it is not feasible to place *any* trail within the areas marked for the topographic, biological, and legal reasons discussed in this letter.

We are also submitting expert biological comments prepared by Robert Hamilton, President of Hamilton Biological, Inc., which are included as Exhibit B to this letter. Mr. Hamilton's analysis has concluded the following:

[T]he City's exclusion of the relevant MSCP Management Policies and Directives from the UCP violates the Parks Master Plan, undermines the UCP's credibility as a planning document, and puts the City's MSCP Take Authorization at risk of revocation by the resource agencies. Furthermore, by prematurely proposing new trails in the absence of a current biological technical report that credibly demonstrates the UCP's consistency with the MSCP and Subarea Plan, the City is improperly raising expectations among the public that these trails can and will be built. The predictable result is unwarranted conflict between environmental and recreational user groups. For these important reasons, the City should withdraw all proposed trails through the MHPA until a credible analysis of MSCP consistency can be completed.

We also urge the City to remove the proposed new trails and proposed formal trails from the draft UCP. Attempting to consider new trails as a part of this process has shortcut necessary MSCP consistency and biological analysis and will only lead to further conflict and delay of the General Plan Update.

**I. The City Must Complete the Citywide Trails Master Plan Process Before Proposing New Trails in MSCP Lands.**

New proposed trails should not be identified on the exhibits within the UCP for two key reasons: (1) This sets expectations for future trail locations, many of which will not be feasible due to topographic constraints, damage to biological resources, or conflicts with other land use and resource policy plans; and (2) Identifying trail locations without first demonstrating compliance with the City's Multiple Species Conservation Program ("MSCP"), the City's Parks Master Plan, and conducting adequate environmental review runs afoul of local regulations and State law.

The Parks Master Plan requires the City to take additional steps before any new trail locations can be proposed for sensitive areas, including Rose Canyon. Specifically, the City must first engage in the planning process committed to for a Citywide Trails Master Plan. Policy CSR 25 from the Parks Master Plan states that the City shall: "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.” (underline added)

To propose new trails in Rose Canyon and other MSCP lands in the UCP before criteria and guidelines for prioritizing habitat management and other MSCP obligations have been developed through the Trails Master Plan runs counter to this policy, responsible planning, and good stewardship practices of the City’s recognized open space resources.

As noted in our August 12, 2022 letter, ensuring that the UCP Update does not propose new trails uninformed by required assessments is also consistent with the commitment expressed by Planning Director Heidi Vonblum. When the Parks Master Plan was adopted on August 3, 2021, Ms. Vonblum assured the City Council at the public hearing that a comprehensive review of the state of San Diego’s MSCP lands would be incorporated into the Trails Master Planning process as a first step. Ms. Vonblum was right to make this commitment – this comprehensive review is critical. It will allow the City (with community input) to make informed decisions about what can and should be prioritized in order to provide the necessary habitat quantity, quality, and habitat connectivity and the necessary resources for monitoring, management, and enforcement to support the viability of San Diego’s unique biodiversity. To propose new trail locations in the UCP at this time runs counter to these commitments.

## **II. The City Must Consider Consistency with the MSCP Before Proposing New Trails.**

In 1997, the City of San Diego finalized the MSCP Subarea Plan to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act and to allow the City to issue take permits under the state and federal Endangered Species Acts. The City’s Multi-Habitat Planning Area (MHPA) delineates core biological resource areas and corridors targeted for conservation as part of the Subarea Plan. The Subarea Plan document identifies Rose Canyon as one of these critical conservation areas. The City must abide by the MSCP protections in place for Rose Canyon and other MHPA lands as part of its legal obligations to comply with the California Natural

Communities Conservation Planning Act (NCCP) and the Federal Endangered Species Act (ESA).

Indeed, as the U.S. District Court for the Southern District of California has emphasized, the Endangered Species Act establishes a strict conservation and recovery standard for listed species and measures implementing the City of San Diego’s MSCP Subarea Plan must be adequate to actually achieve that standard. (*Southwest Center For Biological Diversity v. Bartel* (S.D. Cal. 2006) 470 F.Supp.2d 1123-24.) The court thus held that conservation measures within the City’s MHPA cannot be “ineffective” or “untested.” (*Id.*, 470 F.Supp.2 at 1141.)

The UCP Discussion Draft itself notes that “trails and recreation on lands subject to the Multi-Habitat Planning Areas (“MHPA”) should comply with the MSCP for compatibility. For adjacent areas not deemed sensitive, there are opportunities to improve existing trail systems and pedestrian connections for public use to better promote active and passive recreation. However, development not in compliance with MHPA policies is not allowed within the MHPA (refer to the Parks Master Plan section on Conservation, Sustainability, and Resilience Policies for more information).” *See* UCP at 126. Further, the Parks Master Plan (PMP) section on Conservation, Sustainability, and Resilience referenced above contains additional policies that support the prioritization of MHPA protections and allowing recreation *if and when* habitat is not jeopardized. These include Policy CSR 25 (noted previously in this letter), which calls for “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.”

Despite acknowledging the City’s adopted policy guidance, the UCP Community Discussion Draft released for public review errs by blindly proposing new trails in Rose Canyon and other MSCP lands without considering resource values or whether the trails could comply with MHPA policies. In fact, many of the proposed trails directly conflict with the MSCP and MHPA. The City should remove all these proposed trails from all exhibits in the UCP.

Furthermore, in its recently-adopted Parks Master Plan, the City likewise emphasized that criteria and guidelines for establishing thresholds of access and use in MSCP lands must be prepared *before* new trails may be proposed for evaluation by the City. In addition to the policies listed above, the City also committed to the following specific policy in the Parks Master Plan:

**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).

The City must therefore consider whether new and formal trails within MHPA lands could be consistent with the MSCP resource preservation mandates before proposing areas for these trails in the draft UCP. The City cannot propose trails in this Plan that will never be able to move forward because they conflict with the MSCP.

**A. The MSCP Subarea Plan prioritizes protection of biological resources and prohibits activities that disturb those resources.**

The MSCP Subarea Plan makes clear that “[T]he overarching MSCP goal is to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats.” *See* MSCP Subarea Plan at 49. Furthermore, the Subarea Plan lists management objectives for the MHPA, which includes “[T]o protect the existing and restored biological resources from intense or disturbing activities within and adjacent to the MHPA while accommodating compatible public recreational uses.” *See* MSCP Subarea Plan at 50. All of the proposed trails identified in Figure 24 of the UCP (Exhibit C) are in MHPA lands, which are shown in Exhibit D.

While the UCP Discussion Draft acknowledges the habitat value of Rose Canyon and other MSCP lands on page 145, it fails to appreciate the MSCP Subarea Plan goals and objectives that protection of special status species and habitat is the overriding aim, and passive recreation is only appropriate to the extent that it is compatible with maintaining those resources. Activities that degrade or disturb them are prohibited.

To reflect these MSCP requirements, the text on page 145 of the UCP must be amended as follows “[T]he approximately 8,676-acre University community area supports a variety of vegetation communities and land cover types in its open space including both upland and wetland vegetation communities. The majority of these open space areas are subject to compliance with the City’s MSCP Subarea Plan where ~~preservation balances the protection of~~ natural resources must be preserved, with the allowance of public passive recreation only where compatible with that mandate.”

**B. The MSCP Subarea Plan prohibits locating trails in sensitive habitat areas and requires trails to follow existing dirt roads.**

The MSCP Subarea Plan lists the following as one of the General Management Directives: “Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary due to the typically heightened resource sensitivity in those locations.” *See* MSCP Subarea Plan at 52.

Contrary to this Directive, the draft UCP proposes several new and formalized trails directly through some of the most sensitive, least fragmented habitats in the MHPA and extends trails beyond existing dirt roads. Specific examples are discussed below.

**III. Several of the Proposed Trails are Inconsistent with MSCP Subarea Plan Policies or are Otherwise Infeasible.**

Despite failing to conduct any type of analysis for consistency with the MSCP, the draft UCP charges ahead to blindly propose areas for new and formalized trails. Figure 24 of the UCP shows the “Existing Formal Trail” in Rose Canyon, which is the only approved trail in the Rose Canyon Open Space Park. Additional trails, identified as “Existing Informal Trail – to be Closed”, have been illegally created – some through sensitive habitat. Thankfully, those trails are proposed to be eliminated. Figure 24 identifies two remaining types of trail, however: “Proposed New Trail (location to be determined)” and “Existing Informal Trail, Proposed as a Formal Trail.” Most of these trails would require extensive grading and/or intrusion into sensitive habitat, and must therefore be removed from further consideration on all UCP maps.

A Biological Resources Report was prepared in June 2020 as part of the UCP Update (“Bio Report”), but it did not examine any of the areas within the UCP in detail or evaluate the proposed trails in the discussion draft UCP. The report contains broad information regarding the regulatory environment, an incomplete compendium of sensitive species that could exist in the Plan Area, and a summary of existing conditions. Friends of Rose Canyon has deep concerns regarding the adequacy and accuracy of this Bio Report. Yet, even the high-level summary of existing conditions in the Bio Report and the most cursory assessment of topographic conditions indicates that the proposed trails will conflict with the MSCP’s conservation mandates or are otherwise infeasible.

Many of the proposed trails would also conflict with policies in the draft UCP recognizing the need to respect hillside and canyon areas and to avoid degradation to these areas. The UCP contains policies that identify the need to preserve topography and minimize grading, which would be impossible to accomplish given the locations of several proposed trails in steep canyon areas. For example, UCP Implementation Policy 5.4A states, “Prevent development, grading, or alterations of steep slopes greater than 25 percent grade or in open space canyons.” All of the proposed trails discussed below are in steep open space canyons, so by the UCP’s own policy guidance, these trails should not be considered.

**A. The Two Blue “Proposed New Trail, location to be Determined” Sections in Rose Canyon are Infeasible.**

These two proposed trail locations (identified by “A” label on Exhibit C) are in steep canyon areas with sensitive resources and are completely infeasible and inappropriate for consideration. No additional trails should be proposed anywhere in these two canyon “fingers”. The trail designation on Figure 24, “Location to be determined,” suggests that there is a location within these canyon areas that might be suitable, but that is misleading. Figure 7-2 from the UCP Bio Report illustrates the Sensitive Vegetation Communities that exist in this area (Exhibit E), which includes Wetlands, Tier I Native Grasslands, and Tier II Coastal Sage Scrub. The City of San Diego’s Land Development Manual – Biology Guidelines states that “Vegetation Communities within the MSCP study area have been divided into four tiers of sensitivity (the first includes the most sensitive, the fourth the least) based on rarity and ecological importance.”<sup>1</sup> *See* Land Development Manual at 7. Furthermore, these guidelines note that “lands containing Tier I, II, IIIa and IIIb [communities] and all wetlands . . . are considered sensitive and declining habitats. As such, impacts to these resources may be considered significant.” *See* Land Development Manual at 73.

In addition to containing documented sensitive resources, this area consists of steep topography that cannot accommodate public trails. There is also serious erosion occurring in these locations that would only be exacerbated if trails were somehow constructed in this steep terrain.

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[https://www.sandiego.gov/sites/default/files/amendment to the land development manual biology guidelines february 2018 - clean.pdf](https://www.sandiego.gov/sites/default/files/amendment%20to%20the%20land%20development%20manual%20biology%20guidelines%20february%202018%20-%20clean.pdf)

**B. The Proposed Formal Trail and Trailhead that Links Rose Canyon to Nobel Drive Traverses Critical Habitat.**

This proposed trail location is identified by “B” label on Exhibit C. Under the Federal Endangered Species Act (ESA), the U.S. Fish and Wildlife Service designates certain areas as “critical habitat” if they determine that these geographic areas are essential for the conservation and/or recovery of a federally listed threatened or endangered species, whether or not the species currently occupies the area. The UCP Biological Resources Report notes that “[U]nder the FESA, USFWS designates certain areas as “critical habitat” if they determine that these geographic areas are essential for the conservation and/or recovery of a federally listed threatened or endangered species, whether or not the species currently occupies the area.” See UCP Bio Report at 95.

Figure 8 in the UCP Bio Report identifies locations of USFWS Critical Habitat and demonstrates that the Informal Trail section connecting to Nobel Drive is routed directly through Critical Habitat for Spreading navarretia, a rare species of flowering plant. See Exhibit F. This trail should not only be removed as a proposed formal trail from the UCP exhibits, but it should be eliminated and the area protected from future informal trail establishment. In addition, there are roughly six other informal trails in this area that the UCP should also identify and designate as “To Be Closed.”

**C. The Proposed Formal Trail on the south side of Rose Canyon from Genesee Avenue east towards I-805 Passes Through Sensitive Habitat.**

These proposed trail locations are identified by “C” label on Exhibit C. The Sensitive Vegetation Communities figure from the UCP Bio Report (Exhibit E) illustrates that this proposed trail location is in perennial stream/wetland habitat. It also encroaches on private railroad property. If a trail were to avoid the perennial stream and private property, it would be located on steep slopes with high-quality habitat. Only the western third of this trail is potentially feasible and consistent with MSCP policies, given it would be located on the San Diego Unified School District’s existing dirt road.

Where the proposed trail turns south and heads towards the proposed tail head, it passes through Tier II Coastal Sage Scrub and Tier IIIA Mixed Chaparral, which are considered sensitive and declining habitats, and into steep topography. This southern stretch is extremely steep and narrow with very unsafe conditions.

The City cannot meet its connectivity goals with unsafe trails through sensitive habitats in MHPA lands. The Community Discussion draft already includes appropriate



connectivity infrastructure for this area of the plan with protected bike lanes on Genesee Avenue and Governor Drive.

**D. The Blue Proposed New Trail Section between Campus Point Drive and Towne Center Drive north of Eastgate Mall Passes Through Sensitive Habitat.**

This proposed trail location is identified by “D” label on Exhibit C. -This area east of Campus Point Drive and northwest of Towne Centre Drive, all of which is in the MHPA (Exhibit D). The area is covered in sensitive habitat (Exhibit G). The location of the blue “Proposed New Trail”, in particular, is *directly* through sensitive habitat.

**E. SANDAG’s Antiquated Bike Network Trail Should be Removed from the UCP.**

UCP Figure 17 contains an outdated reference to a previous alignment of the Coastal Rail Trail (CRT). Exhibit H is Figure 3-3 from SANDAG’s 2021 Regional Plan, which incorrectly notes the CRT alignment on the north side of Rose Canyon (Trail ID #11) instead of identifying the “Gilman Connector” (Trail ID #17) as the official CRT alignment. Gilman Drive is the route that the City has selected and approved in accordance with the process identified for each city to “plan, design and construct segments of the trail within their respective jurisdictions.”<sup>2</sup> The UCP correctly shows the alignment of the Coastal Rail Trail on pages 84-85, so the SANDAG trail included on Figure 17 can be removed. This is especially critical since the SANDAG Rose Canyon alignment is through Spreading navarretia and Cuyamaca larkspur habitat, as shown in the Impacted Listed Plant Species table in the 2021 Regional Plan (Exhibit I).

**IV. New and Amended Draft Policies**

In addition to removing proposed trails from the exhibits throughout the UCP, there are also additional policy considerations that should be addressed in the UCP, including:

Suggested new policies:

- “New and formalized trails for passive recreation in Rose Canyon and other MSCP lands will only be considered after sustained habitat conservation and MHPA/MCSP compliance is demonstrated. New trails will be located and

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<sup>2</sup> Coastal Rail Trail information on City of San Diego website:

<https://www.sandiego.gov/cip/projectinfo/featuredprojects/railtrail>



designed so as not interfere with the primary purpose of Rose Canyon and other MSCP lands as open space for the preservation of sensitive habitat areas.”

*Background:* Ensures compliance with Policy PP10 of the Parks Master Plan, language in the UCP itself (page 126), and the goals of the MSCP Subarea Plan.

- “Identify ongoing sources of funding for open space trail enforcement. Actively manage MHPA lands and enforce trail boundaries to ensure conservation directives are met.”

*Background:* The existing trails within Rose Canyon and other MSCP lands experience constant degradation and the construction of new, illegal trails that are damaging to sensitive resources. Electric mountain bikes are enabling motorized travel through the canyon trails that did not exist several years ago. Such motorized uses are not passive recreation allowed under the MSCP. There is limited monitoring of illegal uses on trails within the MHPA boundaries, and habitat resources are suffering. The MSCP Subarea Plan states that “[W]here land is preserved as part of the MSCP through acquisition, regulation, mitigation or other means, management is necessary to continue to ensure that the biological values are maintained over time, and that the species and habitats that have been set aside are adequately protected and remain viable. The City will be responsible for and will continue the management and maintenance of its existing public lands (including those with conservation easement), at current levels. The City will also manage and maintain lands obtained as mitigation where those lands have been dedicated to the City in fee title or easement, and land acquired with regional funds within the City’s MHPA boundaries.” *See* MSCP Subarea Plan at 49. Furthermore, the MSCP Subarea Plan lists the following as one of the General Management Directives: “Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/maintenance as needed.” *See* MSCP Subarea Plan at 52. This work is not currently being done, and financial resources to support trail enforcement and habitat protection in Rose Canyon is paramount.

- “To ensure preservation of sensitive areas, new and formalized trails within MHPA boundaries shall be proposed only where they follow alignment of existing roads/rights of way. New trails can be exempt from this policy if the new trail is proposed for an area that is documented to contain no sensitive biological resources and dedicated funding for ongoing enforcement is established.”

*Background:* The MCSP Subarea Plan lists the following as one of the General Management Directives: “Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary due to the typically heightened resource sensitivity in those locations.” See MSCP Subarea Plan at 52. This proposed UCP policy reiterates and restates anew this important guidance.

In addition to the creation of the new policy statement noted above, there are several existing UCP policies that should be clarified and/or strengthened to support the protection of the University Community Plan area’s important natural assets. The revisions to existing policies include (shown in red underline for suggested additions and ~~strikethrough~~ for suggested deletions):

- Policy 2.9B: Design buildings to ~~reduce~~ eliminate light and glare on building frontages facing canyons and open space.
- Policy 2.9C: Where possible and permitted by governing codes and regulations, developments that are adjacent to natural open space should consider providing ~~provide~~ multi-use trails for hiking, bicycling, jogging, and other uses on their site adjacent to the open space and consistent with MHPA adjacency guidelines so that residents have visual access to and can appreciate the open space.
- Policy 2.9D: Maximize views from the development to open spaces ~~the canyon~~ by orienting the building to the ~~canyon~~ open space, and by locating common amenities and private open spaces adjacent to the ~~canyon edge~~ public open space, and providing direct access to the canyon edge from the development. For MHPA adjacent development, common amenities that involve outdoor lighting and potential noise should be located away from the open space or other MHPA edge and on the other side of buildings from the open space or MHPA edge.
- Policy 4.2C: Through the Citywide Trails Master Plan process, examine locations where neighborhoods and communities can be connected to adjacent parks and trails (if in conformance with MCSP and MHPA guidelines). ~~Connect adjacent communities to trails and trail-adjacent parks by extending existing trails or providing new ones.~~

- Policy 5.1A: Promote open space conservation of natural lands and provide open space linkages ~~(where appropriate)~~, trailheads and bike/pedestrian access with clearly marked entrances where appropriate and in conformance with MCSP and MHPA guidelines.
- Policy 5.1B: Connect open space trails with major canyons, neighborhood parks, schools and private open space areas where feasible and where appropriate and in conformance with MCSP and MHPA guidelines. The proposed trail system is illustrated in Figure ~~11-24 in the Transportation Element and in the Urban Design Element~~.
- Policy 5.1C: Provide opportunities for public access to open space, including portions of the MHPA, through low impact recreation, scenic overlooks, environmental education and research where appropriate and in conformance with MCSP and MHPA guidelines.
- ~~Policy 5.1E: Connect adjacent communities to trails and trail adjacent parks by extending existing trails or providing new ones~~ Suggest deleting – repetitive and same as Policy 4.2C
- ~~Policy 5.13I: Consider the topography, vegetation and scenic value of Rose Canyon for future uses. Passive recreational uses are recommended rather than active uses requiring major grading and construction~~ Suggest deleting – adds no value and “for future uses” is confusing.

## V. **Mobility and Connectivity Improvements on Existing City Streets Should be Prioritized.**

The City cannot meet its connectivity goals with unsafe trails through sensitive habitats in MHPA lands. Instead, the City should use its limited dollars on upgrading existing on-street bike facilities, installing bike-safe infrastructure, and creating protected bike lanes on existing streets. It will also advance important public safety goals. Proposing new and formalized trails in MHPA lands detract from these important priorities.

## VI. **Conclusion.**

This is a pivotal point in the planning process, and we urge the City to produce a Draft UCP that complies with its MSCP obligations. New trails in Rose Canyon and other MHPA lands should follow the appropriate process of assessment *before* identification, as required and as promised by City staff.

We look forward to reviewing the Draft UCP and its accompanying CEQA document.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Heather M. Minner

cc: Deborah Knight, Executive Director, Friends of Rose Canyon (via email)  
Nancy Graham, AICP, Development Project Manager, City of San Diego,  
Planning Department (via email)

Exhibits:

- A. Letter to Heidi Vonblum dated August 12, 2022
- B. Biological comments prepared by Robert Hamilton, President of Hamilton Biological, Inc. dated June 29 , 2023
- C. Annotated UCP Discussion Draft Figure 24
- D. UCP Biological Resources Report Figure 4 – MHPA Lands
- E. UCP Biological Resources Report Figure 7-2 – Sensitive Vegetation Communities (south)
- F. UCP Biological Resources Report Figure 8 – Critical Habitat
- G. UCP Biological Resources Report Figure 7-1 – Sensitive Vegetation Communities (north)
- H. SANDAG 2021 Regional Plan Figure 3-3 – Regional Bicycle Network
- I. SANDAG 2021 Regional Plan Table E-7-3 – Impacted Listed Plant Species within the San Diego Regional Up to the Year 2035

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## EXHIBIT A

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August 12, 2022

**Via Electronic Mail Only**

Heidi Vonblum  
Planning Director  
City of San Diego Planning Department  
9485 Aero Dr, M.S. 413  
San Diego, CA 92123  
E-Mail: VonblumH@sandiego.gov

Re: The City Cannot Propose New Trails in Rose Canyon Open Space at this Time.

Dear Ms. Vonblum:

This firm represents Friends of Rose Canyon in matters related to the University Community Plan Update and the adoption of Blueprint San Diego, the City's General Plan Update.

Friends of Rose Canyon is a community-based organization dedicated to the protection, preservation and restoration of Rose Canyon and the Rose Creek watershed. It has an active Board of Directors and dedicated membership base. Since 2019, Friends of Rose Canyon Executive Director Deborah Knight has participated in the University Community Plan ("UCP") Update Subcommittee, which the City convened to include resident, business and non-profit organization representatives.

At a July 21, 2020 meeting of the Subcommittee, the Planning Department provided a status update on the project and information on open space, habitat, and trails. This presentation included a "Draft Proposed Trails Network" that, unfortunately, suggested proposing new and new formal trails within Rose Canyon as part of the UCP Update. Such a proposal, however, is premature under both state law and City policies.

The City of San Diego Multiple Species Conservation Program ("MSCP") and the City's recently approved Parks Master Plan requires the City to take additional steps before any new trail locations can be proposed for Rose Canyon. Specifically, the

City must adopt a Natural Resource Management Plan (NRMP) for Rose Canyon, and it must then engage in the planning process committed to for a Citywide Trails Master Plan.

As discussed in more detail below, because the City has not yet undergone these critical assessments, the Draft UCP Update released for public review cannot blindly propose new trails in Rose Canyon and other MSCP lands in the University Community Plan area. Instead it could include policy language reiterating that any new trail proposals for Rose Canyon and other MSCP lands in the Plan area must come after and be informed by a completed NRMP and the Trails Master Planning process.

**The City of San Diego must create and fund implementation of a reliable Natural Resource Management Plan for Rose Canyon to ensure that covered species are adequately protected.**

In 1997, the City of San Diego finalized a Multiple Species Conservation Program (MSCP) Subarea Plan to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act and to allow the City to issue take permits under the state and federal Endangered Species Acts. The City's Multi-Habitat Planning Area (MHPA) delineates core biological resource areas and corridors targeted for conservation as part of the Subarea Plan. The Subarea Plan document identifies Rose Canyon as one of these critical conservation areas.

Like other urban habitat areas within the MHPA, Rose Canyon provides habitat for native species and shelter for migrating species. The MSCP also protects habitat linkages that occur in the UC Plan area. In fact, the Subarea Plan document indicates that seventeen species covered under the MSCP are found in urban habitat areas such as Rose Canyon (MSCP, 1997). Several of these species are unique to San Diego County. Some of the species are classified as threatened. One, the Coastal California Gnatcatcher, is listed as federally threatened. It is found in both Rose Canyon and other MSCP lands within the UC Plan area. Preserving Rose Canyon's habitat and natural resources is essential to the survival of these covered species. The City must not propose further trail development that could jeopardize species survival and recovery.

The City must approach Rose Canyon with particular caution in light of its failure to comply with the Subarea Plan's requirements. The Subarea Plan calls for specific management policies for urban habitats—like Rose Canyon—that form part of a natural resource park. In fact, the Subarea Plan notes that the Park and Recreation Department “has prepared or is preparing a Natural Resource Management Plan for adoption by City Council to govern management of these lands.” (MSCP, 1997). Twenty-five years later, the City has yet to adopt such a plan for Rose Canyon. As a result, the



City has not identified appropriate management policies and has not conducted site-specific biological resource assessments. It may not expand uses within Rose Canyon until the requisite plan is complete and potential mitigation measures are assessed.

The failure to complete a Natural Resource Management Plan is exacerbated by the City's lack of monitoring, management, and enforcement of activities currently taking place in Rose Canyon. The natural resources that were intended to be protected through the MSCP process are not being properly safeguarded and are experiencing degradation due to unauthorized activities as well as erosion and invasive species. These impacts are evident throughout Rose Canyon and must be assessed in a Natural Resource Management Plan before adding additional impacts to this environmentally sensitive resource.

Indeed, as the U.S. District Court for the Southern District of California has emphasized, the Endangered Species Act establishes a strict conservation and recovery standard for listed species and mitigation measures in the City of San Diego's MSCP Subarea Plan must be adequate to actually achieve that standard. (*Southwest Center For Biological Diversity v. Bartel* (S.D. Cal. 2006) 470 F.Supp.2d 1123-24.) The court thus held that conservation measures within the City's MHPA cannot be "ineffective" or "untested." (*Id.*, 470 F.Supp.2 at 1141.)

The City's failure to develop and enforce a Natural Resource Management Plan means that it is relying on unevaluated and ineffective measures to preserve the habitat and natural resources of Rose Canyon. As *Bartel* indicates, this is impermissible. The City must assess existing resources and have a plan to properly manage and support covered species before it can consider expanding uses with new trails.

**Adopted City policies also require comprehensive assessments of resource conservation and use as part of the Trails Master Plan before new trails are proposed.**

In its recently-adopted Parks Master Plan, the City likewise emphasized that Natural Resource Management Plans and criteria and guidelines for establishing thresholds of access and use in MSCP lands must be prepared before new trails may be proposed for evaluation by the City. In particular, the City committed to the following specific policies:

**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 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.

The City’s adopted policies thus emphasize that new trails should not be proposed in open space parklands such as Rose Canyon before specific resource assessments and plans have been prepared. To propose new trails in Rose Canyon as part of the draft University Community Plan Update before those steps have been taken would run counter to these policies.

Ensuring that the UCP Update does not propose new trails uninformed by the required assessments is also consistent with your own commitments. When the Parks Master Plan was adopted on August 3, 2021, you assured the City Council that a comprehensive review of the state of San Diego’s MSCP lands would be incorporated into the Trails Master Planning process as a first step. This comprehensive review is critical. It will allow the City (with community input) to make informed decisions about what can and should be prioritized in order to provide the necessary habitat quantity, quality, and connectivity and the necessary resources for monitoring, management, and enforcement to support the viability of San Diego’s unique biodiversity .

\* \* \* \*

Friends of Rose Canyon appreciates your commitment to good planning, and is confident that you share the same goal of ensuring that Rose Canyon and other MSCP lands in the UC Plan area continue to be a community amenity and high-functioning habitat resource that fulfills the requirements of the MSCP. Completing a Natural Resource Management Plan for Rose Canyon and the planning process for the

Heidi Vonblum  
August 12, 2022  
Page 5

Trails Mater Plan are required steps before proposing new trails in Rose Canyon and other MSCP lands. Friends of Rose Canyon looks forward to discussing new trail proposals informed by these planning processes at those times.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Heather M. Minner

cc: Deborah Knight, Executive Director, Friends of Rose Canyon (via email)  
Nancy Graham, AICP, Development Project Manager, City of San Diego,  
Planning Department (via email)

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## EXHIBIT B

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## HAMILTON BIOLOGICAL

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June 29, 2023

UCP Update Project Manager  
City of San Diego Planning Department  
9485 Aero Drive, M.S. 413  
San Diego, CA 92123  
E-Mail: [planuniversity@sandiego.gov](mailto:planuniversity@sandiego.gov)

**SUBJECT: COMMENTS ON BIOLOGICAL RESOURCE ISSUES  
UNIVERSITY COMMUNITY PLAN AND LOCAL COASTAL PLAN  
COMMUNITY DISCUSSION DRAFT (APRIL 2023)**

Dear UCP Project Manager,

The Friends of Rose Canyon is a community organization concerned with the protection of sensitive natural resources in Rose Canyon Open Space Park, and other sensitive habitat areas within the UCP planning area, consistent with existing regulations. At the request of the Friends of Rose Canyon, Hamilton Biological has reviewed the University Community Plan and Local Coastal Plan Update (hereafter “UCP/LCP Update” or “UCP”). Hamilton Biological’s review includes the *Biological Resources Report, University Community Plan Update, City Of San Diego, San Diego County, California*, dated June 26, 2020, prepared for the City of San Diego (the City) by Busby Biological Consulting, Inc. (Busby [2020] or the Busby Report).

### **OVERVIEW OF MSCP AND MHPA**

The San Diego Multiple Species Conservation Program (MSCP) was prepared pursuant to an outline developed by the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. The Subarea Plan forms the basis for the implementing agreement, which is the contract between the City and the wildlife agencies that ensures implementation of the Subarea Plan and thereby allows the City to issue take permits at the local level. The Subarea Plan also qualifies as a stand-alone document to implement the City’s portion of the MSCP preserve.

The City of San Diego Multi-Habitat Planning Area (MHPA) was developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA delineates core biological resource areas and corridors targeted for conservation. The MHPA represents a “hard line” preserve, in which

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boundaries have been specifically determined. It is considered an urban preserve which is constrained by existing or approved development, and is comprised of linkages connecting several large areas of habitat.

### **Subarea Plan Section 1.5.2, General Management Directives**

Section 1.5.2 of the Subarea Plan outlines the plan's general Management Directives that support the MSCP's Conservation Objectives. The Directives are organized by Priority to assist decisions on where to spend limited funds and direct mitigation efforts. Priority 1 refers to Directives that protect management actions needed to adequately protect MSCP-covered species within the MHPA, and Priority 2 refers to Directives that address the long-term conservation actions that can be implemented during the life of the City Subarea Plan as funds become available. The following Priority 1 Directives, from Section 1.5.2 of the Subarea Plan, apply to projects within the UCP planning area.

### **Priority 1 Directives for Public Access, Trails, and Recreation**

1. Provide sufficient signage to clearly identify public access to the MHPA. Barriers such as vegetation, rocks/boulders, or fencing may be necessary to protect highly sensitive areas. Use an appropriate type of barrier based on location, setting, and use. For example, use chain link or cattle wire to direct wildlife movement, and natural rocks/boulders or split rail fencing to direct public access away from sensitive areas. Lands acquired through mitigation may preclude public access to satisfy mitigation.
2. Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary because of the typically heightened resource sensitivity in those locations.
3. In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off trail access and use. Provide trail repair/maintenance as needed. Undertake measures to counter the effects of trail erosion, including the use of stone or wood cross joints, edge plantings of native grasses, and mulching of the trail.
4. Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than four (4) feet in core areas or wildlife corridors. Exceptions are in the San Pasqual Valley, where other agreements have been made; in Mission Trails Regional Park, where appropriate; and in other areas where necessary to safely accommodate multiple uses or disabled access. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.

5. Limit the extent and location of equestrian trails to the less sensitive areas of the MHPA. Locate staging areas for equestrian uses at a sufficient distance (e.g., 300 to 500 feet) from areas with riparian and coastal sage scrub habitats to ensure that the biological values are not impaired.
6. Off-road or cross-country vehicle activity is an incompatible use in the MHPA, except when these vehicles are used for law enforcement, preserve management, or emergency purposes. Restore disturbed areas to native habitat where possible or critical, or allow to regenerate.
7. Limit recreational uses to passive uses such as birdwatching, photography, and trail use. Locate developed picnic areas near MHPA edges or specific areas within the MHPA to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (e.g., opossums, raccoons, skunks). Where permitted, restrain pets on leashes.
8. Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.
9. Maintain equestrian trails on a regular basis to remove manure (and other pet feces) from the trails and preserve system in order to control cowbird invasion and predation. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g., grass-lined) swale or basin to detain runoff and remove pollutants.

A portion of the UCP planning area, including Torrey Pines State Park, lies within the “Northern Area” described in Section 1.2.4 of the Subarea Plan. The Subarea Plan does not identify any additional Management Policies and Directives for this portion of the UCP planning area that warrant discussion in these comments.

Most of the UCP planning area lies within the “Urban Area” described in Section 1.2.3 of the Subarea Plan. The following Management Policies and Directives, from Section 1.5.7 of the Subarea Plan, apply to projects within the “Urban Area” portion of the UCP planning area.

### **Overall Management Policies and Directives for Urban Habitat Lands**

1. Where the MHPA’s Urban Habitat Lands are part of a natural resource park, the City Park and Recreation Department shall manage these lands in accordance with a Natural Resource Management Plan (NRMP). The NRMPs for Urban Habitat Lands include the Marian Bear Memorial Park NRMP, Mission Bay Park NRMP, First San Diego River Improvement Project, and Los Peñasquitos Canyon Preserve NRMP.
2. All other Urban Habitat Lands included within the MHPA should be managed, to the extent possible, according to the general management policies and directives as described in the City Subarea Plan and summarized above.



3. Special management needs or issues for specific Urban Habitat Lands should be resolved by the MHPA Preserve Managers according to an appropriate adaptive management strategy and through coordination with the MSCP habitat management technical committee.

## **UCP PURPOSE AND CONTEXT IS INCOMPLETE AND FLAWED FOR FAILING TO INCORPORATE THE SUBAREA PLAN’S MANAGEMENT POLICIES AND DIRECTIVES**

Page 11 of the UCP (Plan Purpose and Context) lists four citywide policy documents and one regional plan that the City took into account in preparing the UCP:

The policies in this plan are based on several previously adopted citywide policy documents, including the General Plan, Climate Action Plan, Parks Master Plan and Climate Resilient SD. The purpose of this Community Plan is to apply and in some instances tailor the strategies and policies in those plans as appropriate for the University Community. In addition, the regional plan prepared by SANDAG, San Diego Forward, serves as a basis for policies related to mobility and how the University community relates to the region as a whole.

Rather than incorporating the Subarea Plan’s adopted Management Policies and Directives into the policies of the UCP, the City treats these requirements as afterthoughts that may be considered in the future, after the UCP has been adopted. For example, page 126 of the UCP states:

Note that trails and recreation on lands subject to the Multi-Habitat Planning Areas (MHPA) should comply with the Multiple Species Conservation Program (MSCP) for compatibility.

Other sections of the UCP state that the ultimate alignments of the new trails proposed within MHPA “shall comply” with the MSCP (versus “should comply”). In either case, the problem is that the UCP proposes trails in areas known to have sensitive biological resources and/or steep topography that would necessitate extensive disturbance for trail construction. The City’s approach violates the Subarea Plan as well as Policy PP10 in the City’s adopted Parks Master Plan:

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). [emphasis added]

As discussed subsequently in this letter, some or all of the new trails proposed in the UCP cannot possibly be implemented in compliance with the Subarea Plan, regardless of their ultimate alignments. In particular, *Priority 1 Directive No. 2* restricts the construction of trails through sensitive areas:

Locate trails, view overlooks, and staging areas **in the least sensitive areas of the MHPA**. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different

habitat types (ecotones) for longer than necessary because of the typically heightened resource sensitivity in those locations. [emphasis added]

As discussed previously, the City is required to implement all Priority 1 Directives as a condition of its MSCP Take Authorization. Thus the City’s refusal to explicitly incorporate all relevant MSCP Management Policies and Directives into the UCP not only violates the Parks Master Plan and undermines the UCP’s credibility as a planning document, but it puts the City’s MSCP Take Authorization at risk of revocation by the resource agencies.

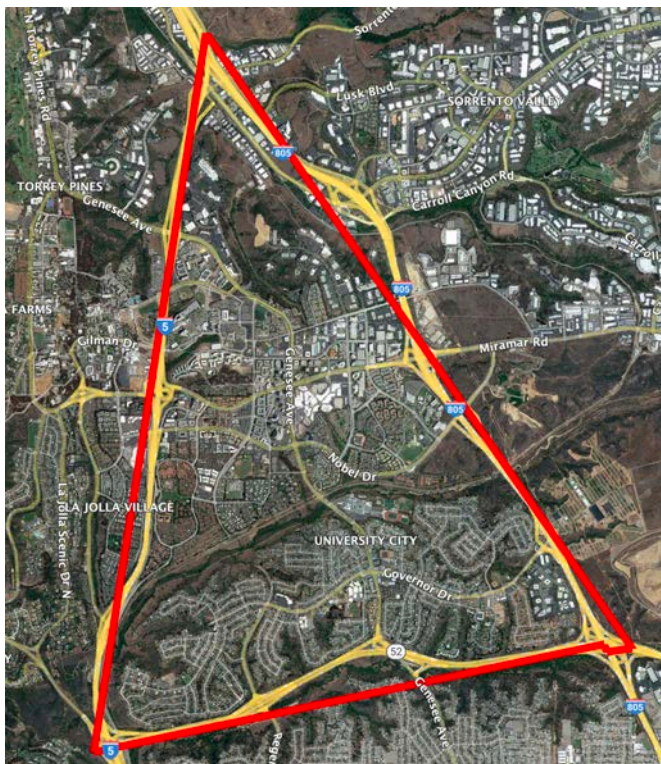
## VISION AND LAND USE FRAMEWORK IGNORES MSCP REQUIREMENTS

Page 17 of the UCP (Vision and Land Use Framework) lists the seven Goals of the plan. None of the UCP’s goals mentions complying with the City’s existing commitment to MSCP land-use planning by implementing the Subarea Plan.

Pages 20–29 of the UCP list 15 Priorities of the plan. One of them, on page 27, touches upon open-space planning:

**Dedicating and Celebrating Open Space:** Open space defines the character of this community. Within this plan there are opportunities to expand open space dedications to ensure their long term conservation. This plan also seeks to strike a balance to allow access for people to appreciate open space and the benefits its protection affords.

This statement implies that the MSCP places too many restrictions on recreational uses within MHPA, and that increased human access into sensitive habitat areas is needed to “strike a balance” between recreation and conservation. Please refer to Exhibit A, below.



**Exhibit A.** For simplicity, this exhibit focuses on the southern part of the UCP planning area—the triangle formed by Interstate 5, Interstate 805, and State Route 52. No ecologist, or other conservation-minded person, looking at this landscape would conclude that building new trails in the few preserved areas not already serviced by formal trails would somehow “strike a balance” between the needs of humans and the needs of sensitive native plant and wildlife species.

As shown in Exhibit A on the previous page, roads and structures occupy nearly all of the hilltops, ridges, and relatively flat grasslands in the southern part of the UCP planning area. The undeveloped canyons that remain (i.e., the MHPA) are crossed by numerous paved roads and laced with an extensive network of trails – authorized or informal – that facilitates access for large numbers of people, bicycles, e-bikes, and dogs.

MSCP planners, recognizing the tremendous challenge of maintaining important ecological values in a highly fragmented landscape over long periods of time, developed the Subarea Plan’s Management Policies and Directives specifically to establish guardrails against further fragmentation and degradation of the few natural areas that remain. Disregarding these *existing conservation mandates*, the UCP targets for new trails precisely the least disturbed, most intact blocks of sensitive habitats in the MHPA. Without irony, the UCP does so in the name of *striking a balance* between habitat conservation and increased human mobility and recreation. The bottom line is that only trails that satisfy all relevant Management Policies and Directives contained in the Subarea Plan are allowable under the MSCP. The UCP must acknowledge that the primary purpose of MHPA lands is resource conservation, with other uses allowed only to the extent they comply with the MSCP Subarea Plan’s Management Policies and Directives.

## **“NATURE BASED PARK” VS. GENERIC “OPEN SPACE”**

Figure 3 on page 31 of the UCP (Planned Land Use) designates Torrey Pines State Natural Reserve as “Nature Based Park” but designates the remaining MHPA as generic “open space.” Under the MSCP Subarea Plan, MHPA represents a “hard line” preserve consisting of core biological resource areas and corridors targeted for conservation. As an objective and straightforward planning document, the UCP should clearly and consistently identify the Subarea Plan’s MHPA open space designations and acknowledge, rather than obfuscate, the City’s conservation commitments wherever they exist in the UCP planning area.

## **URBAN FORESTRY**

The Urban Forestry section of the UCP proposes plantings of the following species of tree known to be invasive in San Diego County<sup>1</sup>: Evergreen Ash (*Fraxinus uhdei*), Chinese Elm (*Ulmus parvifolia*), Red River Gum (*Eucalyptus camadulensis*), and Mexican Fan Palm (*Washingtonia robusta*). No exotic plant species known to be invasive in San Diego County should be planted in the UCP area. Additional plantings of species native to the local area would be appropriate.

Trees should not be planted along roads adjacent to MHPA, as they can shade native scrub habitat, reduce habitat suitability for the California Gnatcatcher and other scrub-dependent wildlife, and provide suitable nesting habitat for the Cooper’s Hawk, an increasingly common raptor that preys mainly on small birds.

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<sup>1</sup> <https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/Landscape/WELDManual-Appendix-I.pdf>

## **OPEN SPACE AND CONSERVATION**

The Open Space and Conservation section of the UCP provides brief summaries of the MSCP and other conservation planning efforts that affect the UCP. Lacking, however, is a straightforward listing of the relevant Management Policies and Directives from the Subarea Plan and a credible determination by the City that any new trails proposed in the UCP comply with all MSCP requirements.

### **TABLE 6: UCP PLAN POLICIES**

Because the City has committed to adhering to all Management Policies and Directives contained in the MSCP Subarea Plan, a reader of the UCP should be able to evaluate the extent to which proposed actions comply with these MSCP requirements. Toward this end, the relevant Management Policies and Directives from the Subarea Plan should be included in the Table 6. Excluding these policies establishes a perceptual gap between what is required under the MSCP and what is being proposed in the UCP, a gap that does not serve any legitimate planning purpose.

### **REVIEW OF BIOLOGICAL RESOURCES REPORT (BUSBY 2020)**

As part of my review, I evaluated the adequacy of the *Biological Resources Report, University Community Plan Update, City of San Diego, San Diego County, California*, (Busby 2020 or the Busby Report) as an informational and analytical document provided in support of the UCP.

#### **Busby Report is Out of Date**

As an initial observation, such reports are generally considered valid for one year after preparation, so the Busby Report is two years out of date.

#### **Busby Report Contains No Analyses**

Page 1 of the Busby Report (Introduction) summarizes the report's purpose:

To inform the UCP update (UCPU), this biological resources report provides a summary of the existing biological resources within the UCP area and assesses potential impacts to these biological resources that may occur through implementation of the updated UCP.

The Busby Report summarizes the regulatory framework of federal, state, and local resource-protection policies and regulations that may be relevant to future impact analyses, but the authors did not use them to analyze the potential effects of implementing the UCP on any natural resource.

Page 41 of the Busby Report (Methods) states, "this UCPU biological resources report is intended to provide a broad-scale analysis of biological resources," but the report includes no impact analysis at any scale.

Given that the Busby Report provides no assessment of potential impacts to biological resources, or conflicts with regulatory requirements, that could occur due to

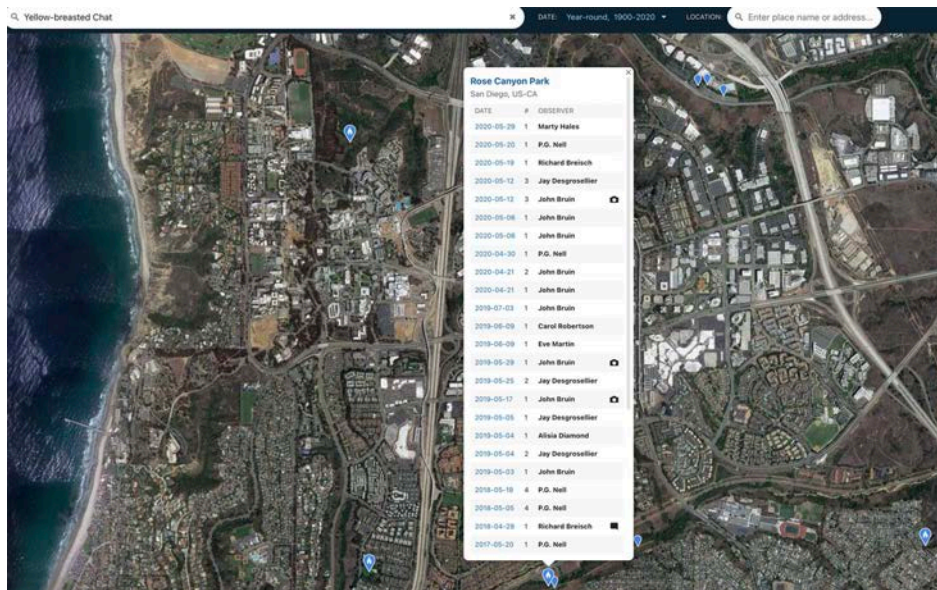


implementation of the UCP, the City would have no basis for referring to this document as supporting any conclusions of the UCP with regard to impact analysis or regulatory compliance.

### Busby Report’s Sensitive Species Information is Incomplete

Much of the Busby Report consists of Table 3, *Sensitive Plant Species with a Potential to Occur within the University Community Plan Update Area*, and Table 4, *Sensitive Wildlife Species with a Potential to Occur in University Community Plan Update Area*. These tables, however, are three years old and fail to incorporate relevant information from public online databases routinely used by field ecologists determining and evaluating the local occurrences of special-status species. Specifically, Busby’s literature review excludes iNaturalist and eBird, both of which document, or at least report, occurrences of special-status species, many of which are never reported to the California Natural Diversity Data Base, Calflora, or other sources referenced in the Busby Report.

The reports in both iNaturalist and eBird are vetted by experts to weed out obviously false reports and to verify evidence that can be confirmed, such as photos showing characteristic field marks. By omitting these important sources of information, the Busby Report provides incomplete and in some cases misleading information on the special-status species known or expected in parts of the UCP planning area. An egregious example is provided by the **Yellow-breasted Chat**, a California Species of Special Concern found in and around riparian areas. Chats have been known to summer in Rose Canyon for more than a decade, yet the species is not mentioned in the Busby Report. The following Exhibit B, a screen-grab from <http://eBird.org>, provides a partial summary of Yellow-breasted Chat records from Rose Canyon Open Space Park that were available at the time the Busby Report was prepared in 2020.



**Exhibit B.** Screen grab from eBird showing a partial list of numerous records of the Yellow-breasted Chat at Rose Canyon Open Space Park from 2017 to 2020, some documented with photographs. The species has also been recorded at several other locations within the UCP planning area.

Page 89 of the Busby Report characterizes the **Least Bell's Vireo**, a species listed as endangered by federal and state governments, as "not expected" as a nesting species in the UCP planning area despite potentially suitable riparian habitat in Rose Canyon and scattered smaller pockets of riparian vegetation elsewhere in the planning area. From May 15 to July 19, 2021, birders P.J. Nell and Jim Roberts repeatedly observed Least Bell's Vireos in Rose Canyon, including an adult feeding a begging juvenile on July 5 (<https://ebird.org/checklist/S91321310>) and July 9 (<https://ebird.org/checklist/S91518140>). Although these observations post-date the 2020 Busby Report, they occurred two years before the UCP was released and would be included in a current and adequate report. This nesting record contradicts the Busby Report's conclusion that nesting by the Least Bell's Vireo is "not expected" within the UCP planning area.

### **No Maps of Special-Status Species or Wildlife Use Areas**

In evaluating the appropriateness of potential trail alignments, biologists and planners normally utilize maps showing the locations where special-status plant and wildlife species have been observed. Also valuable in this regard are maps showing areas used as wildlife denning sites or other forms of refugia for wildlife species that may be sensitive to human disturbance (e.g., nesting raptors, Bobcats). The Busby Report provides no such maps.

### **No Evaluation of Fragmentation, Edge, and Recreation/Trail Effects**

The UCP planning area is mostly developed in the existing condition, with natural open space occurring in fragments constrained by surrounding development (see, for example, Exhibit A on page 5 of this letter). Nevertheless, some of these habitat fragments retain important ecological values, as reflected by their designation as MHPA. If these reserve lands are protected from significant habitat degradation resulting from habitat fragmentation, edge effects, and recreation/trail effects, as required under the MSCP, many sensitive plant and wildlife populations can be expected to persist in these fragments over the long term. Without adequate protection, however, the ecological value of these fragments will degrade over time. Given the importance of addressing these topics across the MHPA, it is surprising and disappointing that the Busby Report contains only four mentions of habitat fragmentation, three of which are in reference to construction policies for roads and utilities passing through MHPA (page 15). The fourth reference, on page 98, is contained in the report's perfunctory and inaccurate discussion of "Wildlife Movement Corridors." Even more surprising is the Busby Report's lack of discussion of edge effects or recreation/trail effects, which are of paramount importance to MSCP planning. The following overview of these concepts, as distilled from the peer-reviewed literature, is offered as a useful contribution to the UCP planning process. The City must take into account these adverse effects before considers proposing any new trails in the MHPA.

#### *Fragmentation and Edge Effects*

Urbanization typically includes residential, commercial, industrial, and road-related development (i.e., the "built" environment). At the perimeter of the built environment is

an area known as the urban/wildland interface, or “development edge.” In ecology, “edges” are places where natural communities interface, vegetation or ecological conditions within natural communities interact (Noss 1983), or patches with differing qualities abut one another (Ries and Sisk 2004). “Edge effects” are spillover effects from the adjacent human-modified matrix that cause physical gradients in light, moisture, noise, etc. (Camargo and Kapos 1995; Murcia 1995, Sisk et al. 1997) and/or changes in biotic factors such as predator communities, density of human-adapted species, and food availability (Soulé et al. 1988; Matlack 1994; Murcia 1995; Ries and Sisk 2004).

Edge effects and habitat fragmentation are among the principal threats to persistence of biological diversity (Soulé 1991). Edge-related impacts may include:

- Introduction/expansion of invasive exotic vegetation carried in from vehicles, people, animals or spread from backyards or fuel modification zones adjacent to wildlands.
- Higher frequency and/or severity of fire as compared to natural fire cycles or intensities.
- Companion animals (pets) that often act as predators of, and/or competitors with, native wildlife.
- Creation and use of undesignated trails that often significantly degrade the reserve ecosystems through such changes as increases in vegetation damage and noise.
- Introduction of or increased use by exotic animals which compete with or prey on native animals.
- Influence on earth systems and ecosystem processes, such as solar radiation, soil richness and erosion, wind damage, hydrologic cycle, and water pollution that can affect the natural environment.

Any of these impacts, individually or in combination, can result in the effective loss or degradation of habitats used for foraging, breeding or resting, with concomitant effects on population demographic rates of sensitive species.

Harrison and Bruna (1999) completed a review of a suite of studies dealing with fragmentation and edge effects and concluded that there is a general pattern of reduction of biological diversity in fragmented habitats compared with more intact ones, particularly with regard to habitat specialists. While physical effects associated with edges were predominant among species impacts, they found evidence for indirect effects including altered ecological interactions. Fletcher et al. (2007) found that distance from edge had a stronger effect on species than did habitat patch size, but they acknowledged the difficulty in separating those effects empirically. Many southern California plant and animal species are known to be sensitive to fragmentation and edge effects; that is, their abundance declines with fragment size and proximity to an edge (Wilcove 1985; Soulé et al. 1992; Bolger et al. 1997a,b; Suarez et al. 1998; Burke and Nol 2000).



Wildlife populations are typically changed in proximity to edges, either by changes in their demographic rates (survival and fecundity), or through behavioral avoidance of or attraction to the edge (Sisk et al. 1997; Ries and Sisk 2004). For example, coastal sage scrub areas within 250 meters of urban edges consistently contain significantly less bare ground and more coarse vegetative litter than do more “intermediate” or “interior” areas, presumably due increased human activity/disturbance of the vegetation structure near edges (Kristan et al. 2003). Increases in vegetative litter often facilitate growth of non-native plants (particularly grasses), resulting in a positive feedback loop likely to enhance plant invasion success (Wolkovich et al. 2009). In another coastal southern California example, the abundance of native bird species sensitive to disturbance is typically depressed within 200 to 500 meters (650 to 1640 feet) of an urban edge, and the abundance of disturbance-tolerant species is elevated up to 1000 meters (3280 feet) from an urban edge, depending on the species (Bolger et al. 1997a).

Habitat fragmentation is usually defined as a landscape scale process involving habitat loss and breaking apart of habitats (Fahrig 2003). Habitat fragmentation is among the most important of all threats to global biodiversity; edge effects (particularly the diverse physical and biotic alterations associated with the artificial boundaries of fragments) are dominant drivers of change in many fragmented landscapes (Laurance and Bierregaard 1997; Laurance et al. 2007).

Fragmentation decreases the connectivity of the landscape while increasing both edge and remnant habitats. Urban and agricultural development often fragments wildland ecosystems and creates sharp edges between the natural and human-altered habitats. Edge effects for many species indirectly reduce available habitat use or utility in surrounding remaining areas; these species experience fine-scale functional habitat losses (e.g., see Bolger et al. 2000; Kristan et al. 2003; Drolet et al. 2016). Losses of coastal sage scrub in southern California have resulted in the increased isolation of the remaining habitat fragments (O’Leary 1990). Fragmentation has a greater relative negative impact on specialist species (e.g., the Coastal Cactus Wren, *Campylorhynchus brunneicapillus*) that have strict vegetation structure and area habitat requirements (Soulé et al. 1992).

Specialist species have an increased risk of extirpation in isolated habitat remnants because the specialized vegetative structures and/or interspecific relationships on which they depend are more vulnerable to disruption in these areas (Vaughan 2010). In studies of the coastal sage scrub and chaparral systems of coastal southern California, fragment area and age (time since isolation) were the most important landscape predictors of the distribution and abundance of native plants (Soulé et al. 1993), scrub-breeding birds (Soulé et al. 1988; Crooks et al. 2001), native rodents (Bolger et al. 1997b), and invertebrates (Suarez et al. 1998; Bolger et al. 2000).

Edge effects that emanate from the human-dominated matrix can increase the extinction probability of isolated populations (Murcia 1995; Woodroffe and Ginsberg 1998). In studies of coastal sage scrub urban fragments, exotic cover and distance to the urban edge were the strongest local predictors of native and exotic carnivore distribution and

abundance (Crooks 2002). These two variables were correlated, with more exotic cover and less native shrub cover closer to the urban edge (Crooks 2002).

The increased presence of human-tolerant “mesopredators” in southern California represents an edge effect of development; they occur within the developed matrix and are thus more abundant along the edges of habitat fragments, and they are effective predators on birds, bird nests, and other vertebrates in coastal sage scrub and chaparral systems and elsewhere (Crooks and Soulé 1999). The mammalian carnivores more typically detected in coastal southern California habitat fragments are resource generalists that likely benefit from the supplemental food resources (e.g., garden fruits and vegetables, garbage, direct feeding by humans) associated with residential developments. As a result, the overall mesopredator abundance, of such species as raccoons (*Procyon lotor*), opossums (*Didelphis virginiana*), and domestic cats (*Felis catus*), increases at sites with more exotic plant cover and closer to the urban edge (Crooks 2002). Although some carnivores within coastal sage scrub fragments seem tolerant of disturbance, many fragments have (either actually or effectively) already lost an entire suite of predator species, including mountain lion, bobcats (*Lynx rufus*), spotted skunks (*Spilogale gracilis*), long-tailed weasels (*Mustela frenata*), and badgers (*Taxidea taxus*) (Crooks 2002). Most “interior” sites within such fragments are still relatively near (within 250 meters of) urban edges (Crooks 2002).

Fragmentation generally increases the amount of edge per unit land area, and species that are adversely affected by edges can experience reduced effective area of suitable habitat (Temple and Cary 1988), which can lead to increased probability of extirpation/extinction in fragmented landscapes (Woodroffe and Ginsberg 1998). For example, diversity of native bees (Hung et al. 2015) and native rodents (Bolger et al. 1997b) is lower, and decomposition and nutrient cycling are significantly reduced (Treseder and McGuire 2009), within fragmented coastal sage scrub ecosystems as compared to larger core reserves. Similarly, habitat fragmentation and alterations of sage scrub habitats likely have reduced both the genetic connectivity and diversity of coastal-slope populations of the Cactus Wren in southern California (Barr et al. 2015). Both Bell’s Sparrows (*Artemisiospiza belli*) and California Thrashers (*Toxostoma redivivum*) show strong evidence of direct, negative behavioral responses to edges in coastal sage scrub; that is, they are edge-averse (Kristan et al. 2003), and California Thrashers and California Quail (*Callipepla californica*) were found to be more vulnerable to extirpation with smaller fragment size of the habitat patch (Bolger et al. 1991), demonstrating that both behavioral and demographic parameters can be involved. Other species in coastal sage scrub ecosystems, particularly the Cactus Wren and likely the California Gnatcatcher and San Diego Pocket Mouse (*Chaetodipus fallax*), are likely vulnerable to fragmentation, but for these species the mechanism is likely to be associated only with extirpation vulnerability from habitat degradation and isolation rather than aversion to the habitat edge (Kristan et al. 2003). Bolger (et al. 1997b) found that San Diego coastal sage scrub and chaparral canyon fragments under 60 acres that had been isolated for at least 30 years support very few populations of native rodents, and they suggested that fragments larger than 200 acres in size are needed to sustain native rodent species populations.

The penetration of exotic species into natural areas can reduce the effective size of a reserve in proportion to the distance they penetrate within the reserve: Argentine Ants serve as an in-depth example of edge effects and fragmentation. Spatial patterns of Argentine Ant abundance in scrub communities of southern California indicate that they are likely invading native habitats from adjacent developed areas, as most areas sampled greater than 200 to 250 meters from an urban edge contained relatively few or no Argentine Ants (Bolger 2007, Mitrovich et al. 2010). The extent of Argentine Ant invasions in natural environments is determined in part by inputs of urban and agricultural water run off (Holway and Suarez 2006).

Native ant species were more abundant away from edges and in areas with predominantly native vegetation. Post-fragmentation edge effects likely reduce the ability of fragments to retain native ant species; fragments had fewer native ant species than similar-sized plots within large unfragmented areas, and fragments with Argentine Ant-free refugia had more native ant species than those without refugia (Suarez et al. 1998). They displace nearly all surface-foraging native ant species (Holway and Suarez 2006) and strongly affect all native ant communities within about 150 to 200 meters from fragment edges (Suarez et al. 1998; Holway 2005; Fisher et al. 2002; Bolger 2007; Mitrovich et al. 2010). Argentine Ants are widespread in fragmented coastal scrub habitats in southern California, and much of the remaining potential habitat for Blainville's Horned Lizards (*Phrynosoma blainvillii*) is effectively unsuitable due to the penetration of Argentine Ants and the subsequent displacement of the native ant species that horned lizards need as prey (Fisher et al. 2002). Invasion of Argentine Ants into coastal sage scrub has also shown a strong negative effect on the abundance of the Gray Shrew (*Notiosorex crawfordi*) (Laakkonen et al. 2001).

### *Recreation and Trail Effects*

In the introduction to their study on the efficacy and perception of trail use enforcement at the 866-acre Del Mar Mesa Preserve in the City of San Diego, Greer et al. (2017:56-57) briefly summarized adverse effects of recreation upon ecological functions and values:

The field of Recreation Ecology studies the impacts of recreation users on various biotic and abiotic elements of the landscape. Studies have shown that various types of passive outdoor recreation can result in displacement and reduction of wildlife, the trampling of native habitat and species, impacts to soil and water resources [although] users may not be aware of their impacts or legality of their actions. This balance between recreational use and natural resource conservation has become a key element of land management around the world. [citations omitted]

Greer et al. (2017) evaluated different approaches to resolving problems associated with creation, use, and maintenance of unpermitted trails at the Del Mar Mesa Preserve, activities that had fragmented and degraded the Preserve's natural communities for at least a decade at that time. They concluded, in part:

This Study showed that soft enforcement aimed at public education and redirecting social norms was not sufficient in curbing illegal trail use in an urban natural area. The movement towards citations and the threat of citations was effective at redirecting behavior by making

non-compliance more risky. This in turn had an unintended consequence of promoting hostility amongst a large user base.

The long-standing resource management problems associated with illegal trails at the Del Mar Mesa Preserve persist, with no clear resolution in sight (e.g., Karen Billing, San Diego Union Tribune, July 6, 2022: *Del Mar Mesa Preserve Tunnel Trail Vandalized* <https://www.sandiegouniontribune.com/local/story/2022-07-06/del-mar-mesa-preserve-trail-vandalized>).

## EVALUATION OF TWO PROPOSED NEW TRAILS IN UCP

All trails, including those that are carefully sited and well-designed, necessarily contribute to habitat fragmentation, edge effects, and recreation impacts. To minimize these insidious forms of habitat degradation, Section 1.5.2 of the Subarea Plan identifies several Priority 1 Directives for Public Access, Trails, and Recreation. As discussed previously in this letter, the most important of these for the UCP project is No. 2:

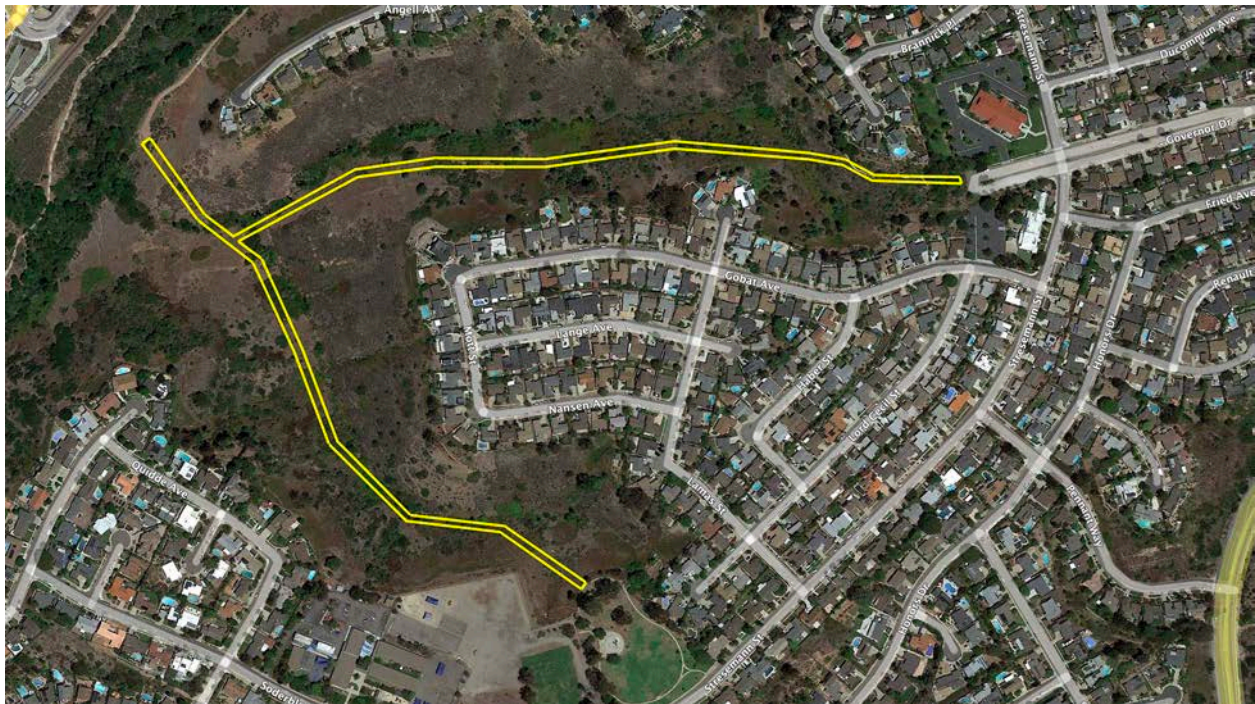
Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary because of the typically heightened resource sensitivity in those locations.

I have not yet visited the specific areas that would be impacted by proposed new trails, but examination of aerial imagery and Figure 7-2 in the Busby Report (Sensitive Vegetation Communities) demonstrate to me that construction of at least two of the proposed new trails – from Governor Drive and from Stresemann Street to the bottom of Rose Canyon – would be grossly inconsistent with the MSCP's conservation goals. These two trails would be built through sensitive wetlands, native grasslands, and coastal sage scrub in two major side-canyons to Rose Canyon that lack substantial trails in the existing condition (see Exhibit C on the next page). According to Debby Knight (in litt.):

The canyons there are incredibly steep and are crisscrossed by huge, deep erosion gullies caused by storm drain pipes that empty out from the streets along the edges of development. This causes wide erosion gullies that are 8-10' deep and simply uncrossable. These crisscrossing the whole area. Topo maps should show how steep the terrain is in areas. A few of us tried to walk these two trails several years ago. We tried to walk from the west end of Governor down, and found it nearly impossible to walk due to how steep the slope is, and the fact that we had to repeatedly climb down into deep erosion gullies and back up again. We made it only a small distance of the way in over an hour. We tried to walk from the bottom up of the proposed trail alignment from Stresemann St., and that was also literally impossible to walk - a giant erosion gully about 8' deep and 10' across, and then slopes so steep we could barely keep our footing. We stopped less than half way up.

Because of their prohibitive topography, the sensitive natural communities, and lack of substantial trails, these two side-canyons to Rose Canyon currently provide habitat for those wildlife species that are most sensitive to habitat fragmentation, human presence (hiking, cycling), and presence of dogs. Constructing new trails through these important areas of refuge would be completely antithetical to MSCP conservation goals.





**Exhibit C.** Showing the conceptual, or schematic, alignments for approximately one mile of new trails that the UCP proposes to connect from Governor Drive (northern trail) and Stresemann Street (southern trail) to the southern end of the existing Rose Canyon Trail. Contrary to MSCP planning principles, these trails would be built through steep terrain vegetated with sensitive plant communities (wetlands, native grassland, coastal sage scrub) in canyons that currently lack substantial trails. Such areas are especially valuable for wildlife that is sensitive to habitat fragmentation, human presence (hiking, cycling), and interactions with dogs.

## **ALL PROPOSED TRAILS MUST BE EVALUATED FOR MSCP CONSISTENCY**

The two trails discussed previously and shown in Exhibit C present the most obvious conflicts with the MSCP and the MHPA. Given the hard line reserve status of the urban reserve lands in the MHPA, it is unlikely that any new trails, apart from trails proposed entirely on existing dirt roads, could be legitimately determined to be consistent with MSCP requirements. The City must conduct a thorough and credible evaluation for MSCP consistency before proposing any new trails in the MHPA.

## **CONCLUSION**

As discussed herein, the City’s exclusion of the relevant MSCP Management Policies and Directives from the UCP violates the Parks Master Plan, undermines the UCP’s credibility as a planning document, and puts the City’s MSCP Take Authorization at risk of revocation by the resource agencies. Furthermore, by prematurely proposing new trails in the absence of a current biological technical report that credibly demonstrates the UCP’s consistency with the MSCP and Subarea Plan, the City is improperly raising expectations among the public that these trails can and will be built. The predictable result is unwarranted conflict between environmental and recreational user groups. For these important reasons, the City should withdraw all proposed trails through the MHPA until a credible analysis of MSCP consistency can be completed.

If any recipient has questions, please send e-mail to [robb@hamiltonbiological.com](mailto:robb@hamiltonbiological.com) or call me at (562) 477-2181.

Sincerely,



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cc: David Zoutendyk, USFWS  
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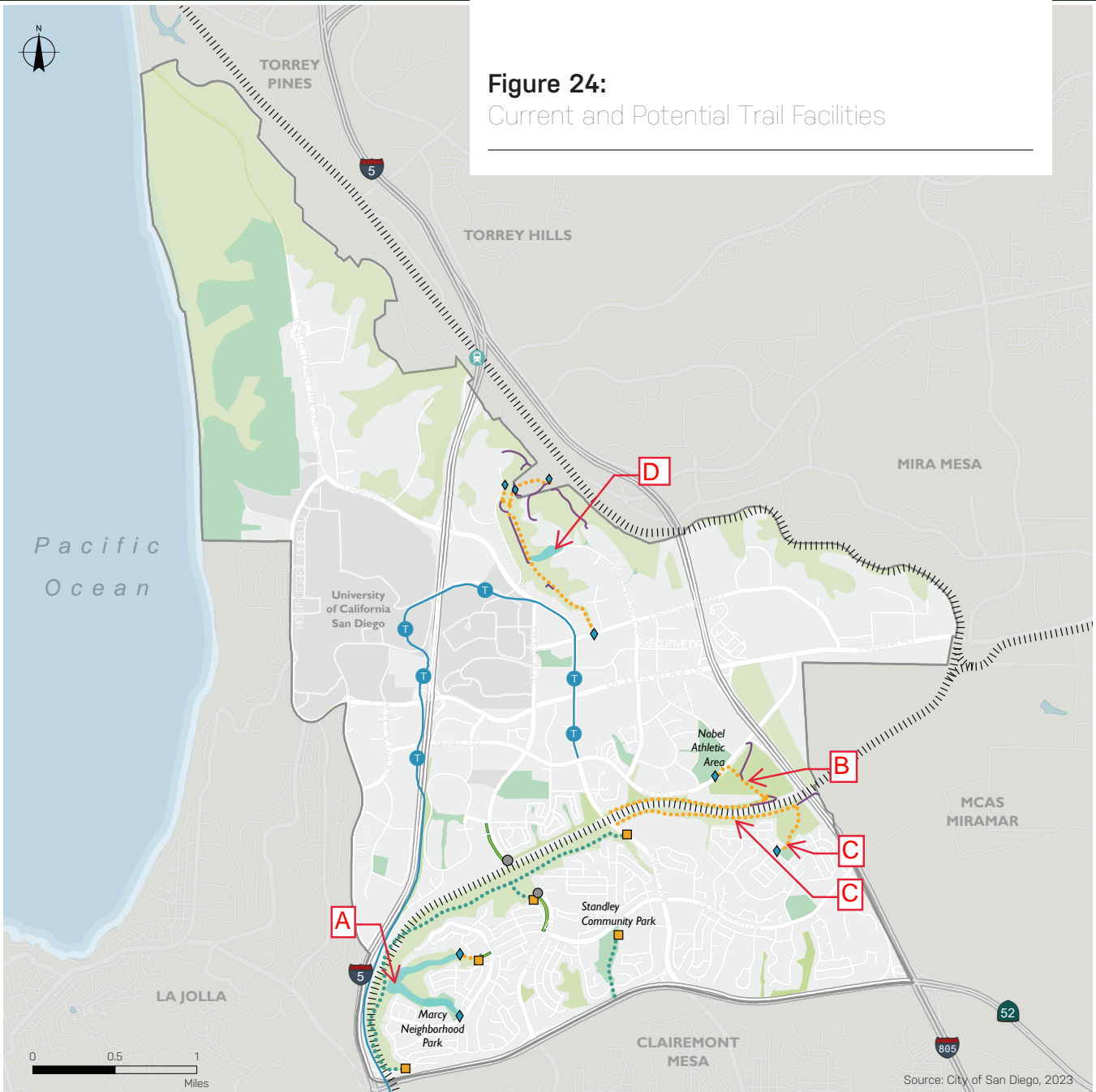
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## EXHIBIT C

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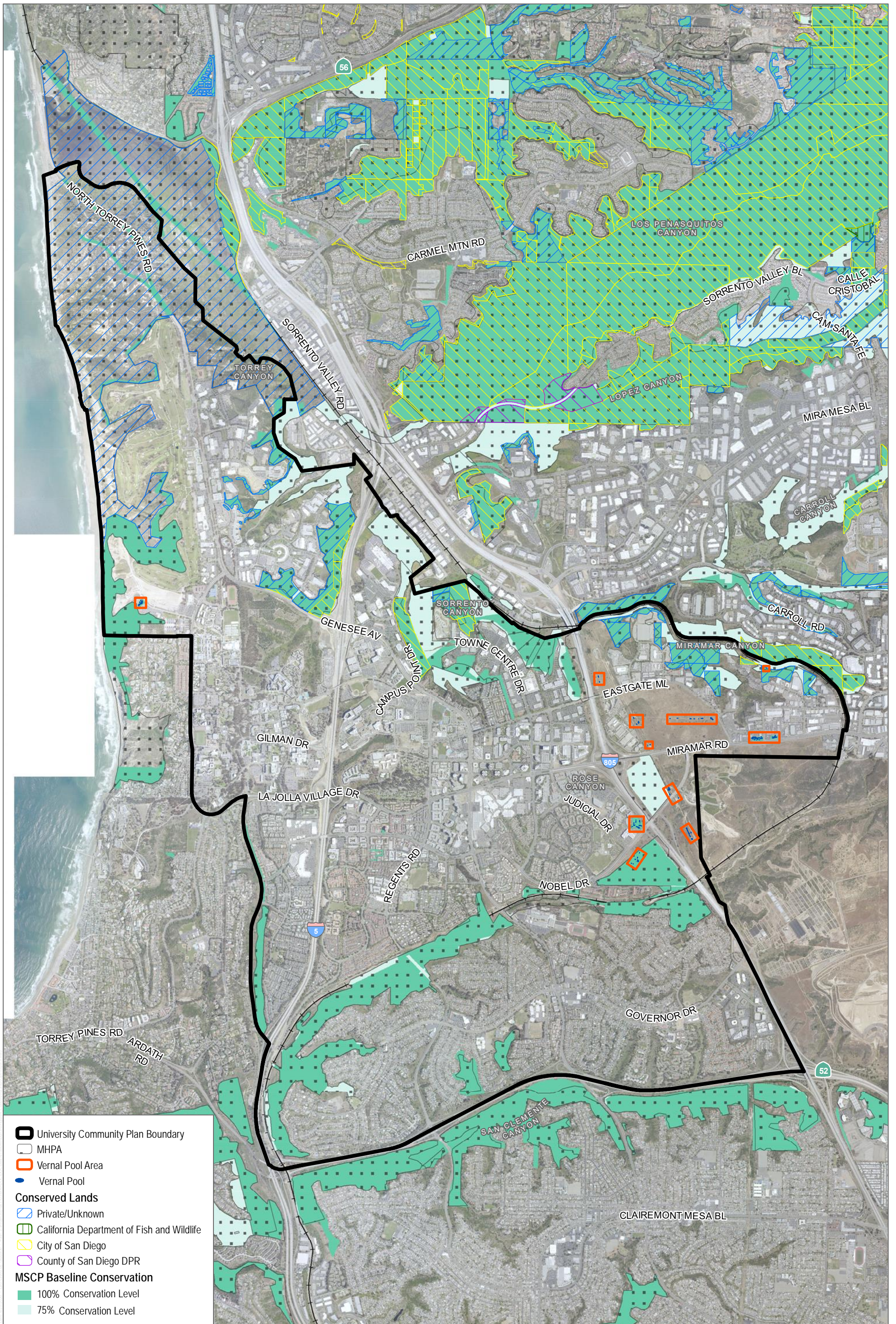
**Figure 24:**  
Current and Potential Trail Facilities

- Possible Overlook
- ◆ Possible Trailhead
- Existing Trailhead
- Future Parks
- Existing Informal Trail - To Be Closed
- Proposed New Trail (location to be determined)
- ⋯ Existing Informal, Proposed as a Formal Trail
- ⋯ Existing Formal Trail

## EXHIBIT D

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SOURCE: SANGIS 2017, 2019; USFWS 2020



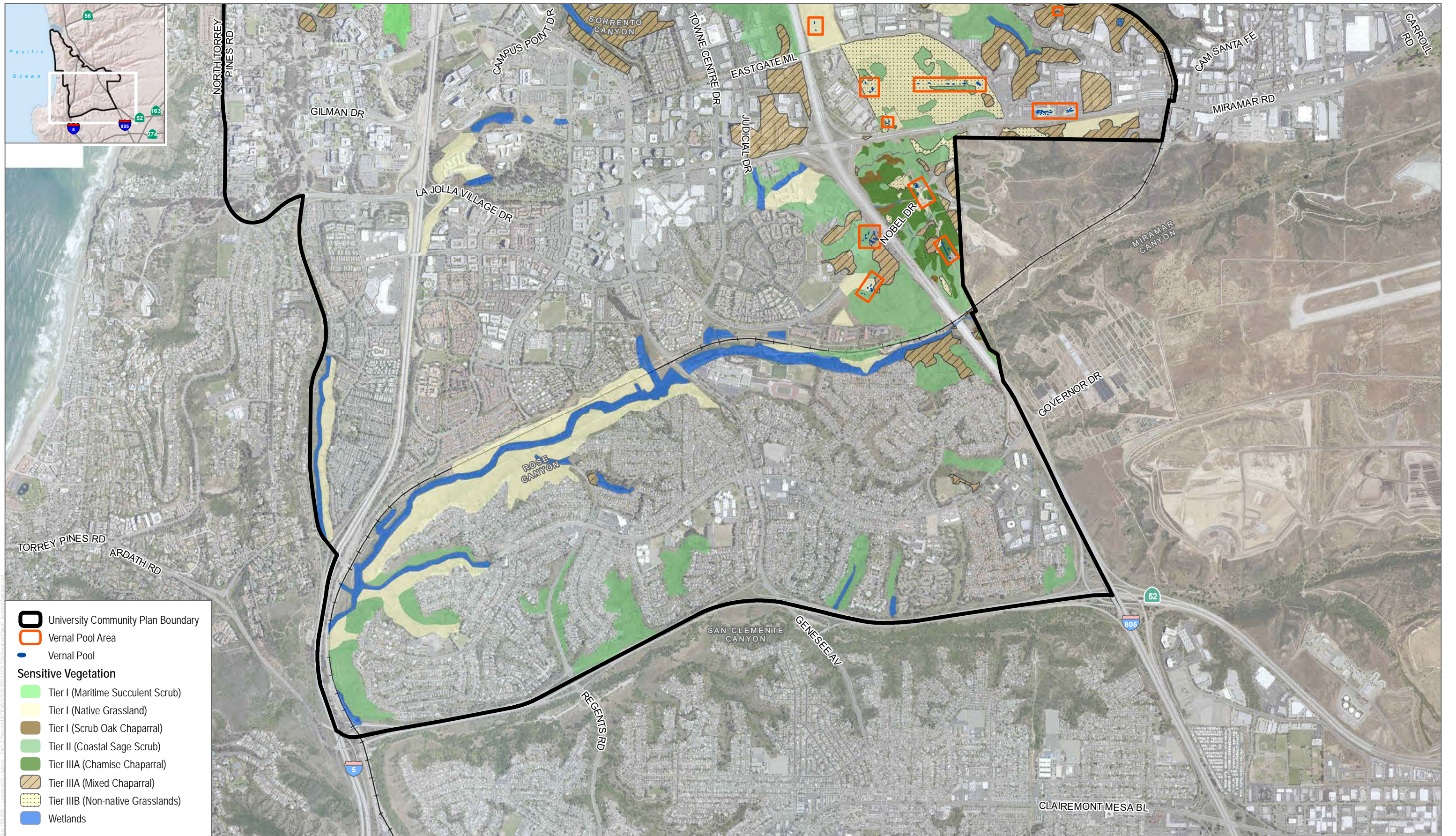
**FIGURE 4**  
Conserved Lands and Open Space  
University Community Plan Update



## EXHIBIT E

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SOURCE: SANGIS 2017



FIGURE 7-2

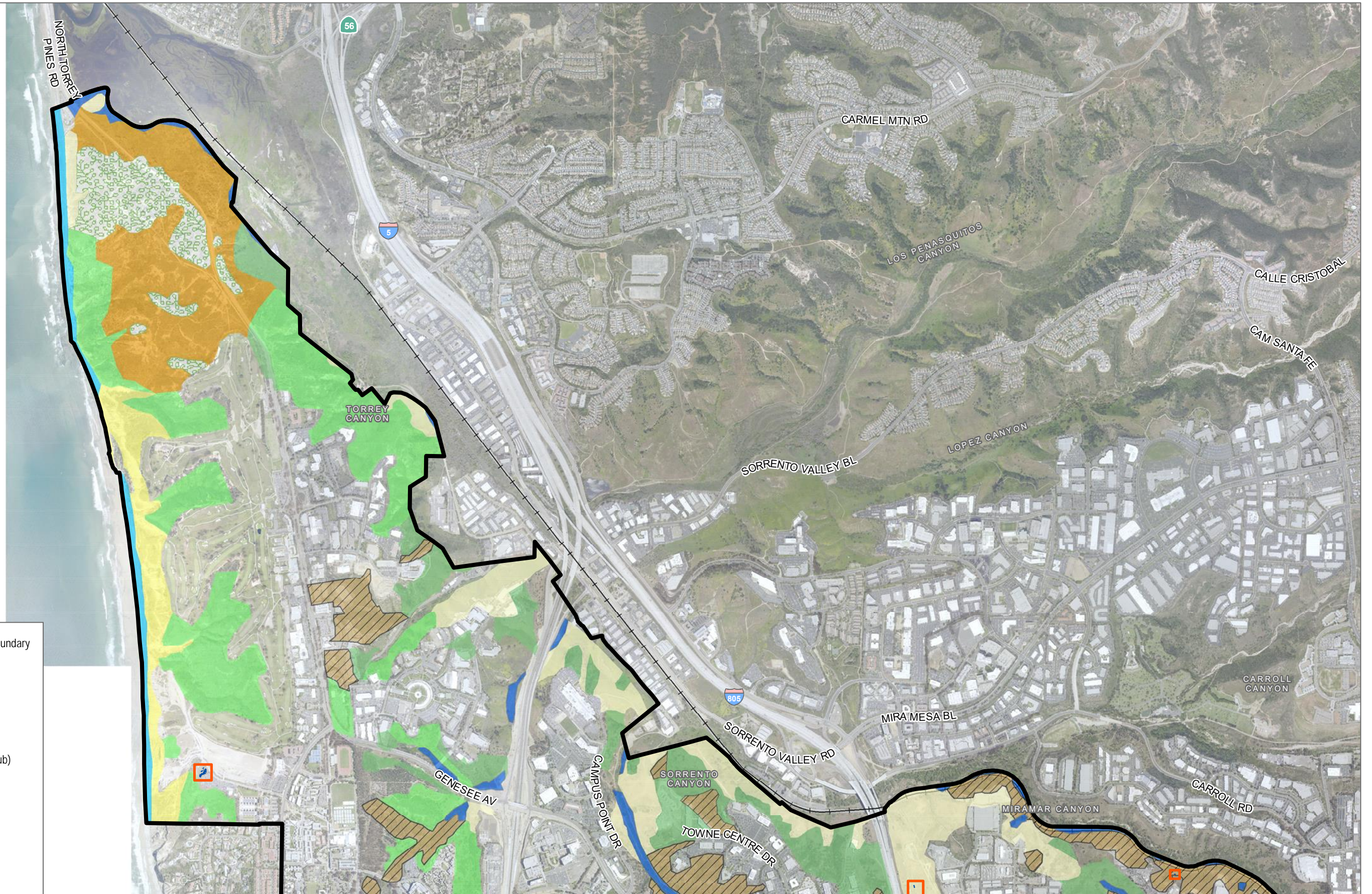
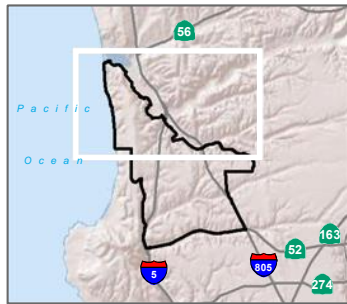
Sensitive Vegetation Communities  
University Community Plan Update



## EXHIBIT F

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- University Community Plan Boundary
- Vernal Pool Area
- Vernal Pool
- Sensitive Vegetation**
- Tier I (Coastal Bluff Scrub)
- Tier I (Maritime Chaparral)
- Tier I (Maritime Succulent Scrub)
- Tier I (Native Grassland)
- Tier I (Torrey Pines Forest)
- Tier II (Coastal Sage Scrub)
- Tier IIIA (Mixed Chaparral)
- Wetlands
- Wetlands/Tier I

SOURCE: SANGIS 2017



FIGURE 7-1

Sensitive Vegetation Communities  
University Community Plan Update



## EXHIBIT G

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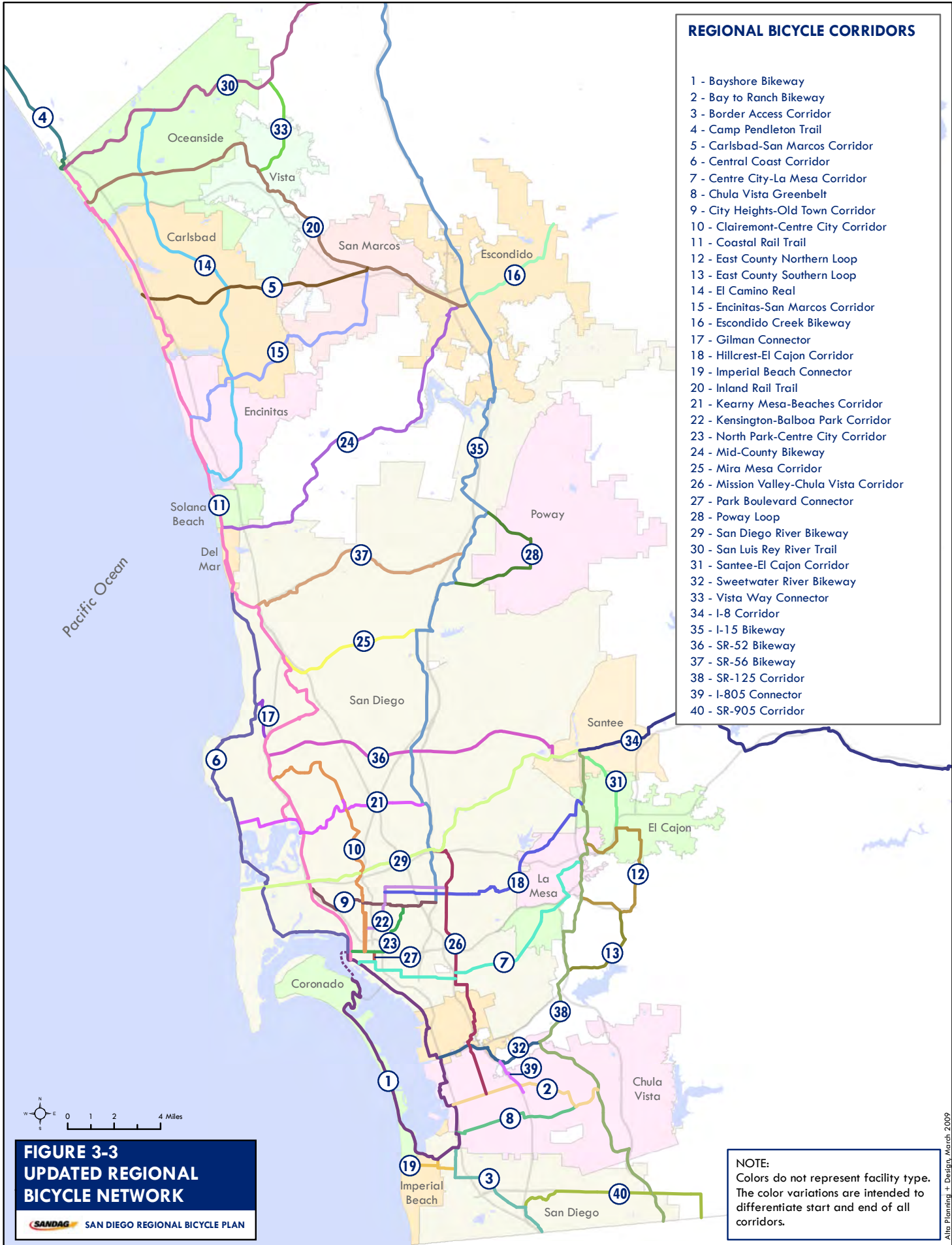






## EXHIBIT H

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**REGIONAL BICYCLE CORRIDORS**

- 1 - Bayshore Bikeway
- 2 - Bay to Ranch Bikeway
- 3 - Border Access Corridor
- 4 - Camp Pendleton Trail
- 5 - Carlsbad-San Marcos Corridor
- 6 - Central Coast Corridor
- 7 - Centre City-La Mesa Corridor
- 8 - Chula Vista Greenbelt
- 9 - City Heights-Old Town Corridor
- 10 - Clairemont-Centre City Corridor
- 11 - Coastal Rail Trail
- 12 - East County Northern Loop
- 13 - East County Southern Loop
- 14 - El Camino Real
- 15 - Encinitas-San Marcos Corridor
- 16 - Escondido Creek Bikeway
- 17 - Gilman Connector
- 18 - Hillcrest-El Cajon Corridor
- 19 - Imperial Beach Connector
- 20 - Inland Rail Trail
- 21 - Kearny Mesa-Beaches Corridor
- 22 - Kensington-Balboa Park Corridor
- 23 - North Park-Centre City Corridor
- 24 - Mid-County Bikeway
- 25 - Mira Mesa Corridor
- 26 - Mission Valley-Chula Vista Corridor
- 27 - Park Boulevard Connector
- 28 - Poway Loop
- 29 - San Diego River Bikeway
- 30 - San Luis Rey River Trail
- 31 - Santee-El Cajon Corridor
- 32 - Sweetwater River Bikeway
- 33 - Vista Way Connector
- 34 - I-8 Corridor
- 35 - I-15 Bikeway
- 36 - SR-52 Bikeway
- 37 - SR-56 Bikeway
- 38 - SR-125 Corridor
- 39 - I-805 Connector
- 40 - SR-905 Corridor

**FIGURE 3-3  
UPDATED REGIONAL  
BICYCLE NETWORK**

**SANDAG** SAN DIEGO REGIONAL BICYCLE PLAN

**NOTE:**  
Colors do not represent facility type.  
The color variations are intended to  
differentiate start and end of all  
corridors.

Atlas Planning + Design, March 2009



## EXHIBIT I

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**Table E-7-3  
Impacted Listed Plant Species within the San Diego Region Up to the Year 2035**

Regional Growth and Land Use Change / Transportation Network Improvement <sup>2</sup>	Vernal Pool Species <sup>1</sup>					Wetland/Riparian Species <sup>1</sup>					Uplands Species <sup>1</sup>																		
	San Diego Button-Celery	Otay Mesa mint	Spreading navarretia	California Orcutt grass	San Diego mesa mint	Salt marsh bird' s-beak	Willow monardella	Parish' s meadowfoam	Mojave tarplant	San Bernardino blue grass	San Diego thorn-mint	San Diego ambrosia	Del Mar manzanita	Coastal dunes milk-vetch	Encinitas baccharis	Nevin' s barbery	Thread-leaved brodiaea	Orcutt' s spineflower	Otay tarplant	Short-leaved dudleya	Mexican flannelbush	Orcutt' s hazardia	Peirson' s milk-vetch	Gander' s ragwort	Small-leaved rose	Cuyamaca larkspur	Dehesa nolina	Dunn' s mariposa lily	
2025 Summary	X	X	X		X	X				X	X	X				X	X	X											
2035 Regional Growth and Land Use Change	X				X	X	X				X	X				X	X	X					X					X	
Coastal Rail Trail – Rose Canyon			X																						X				
Coastal Rail Trail Carlsbad – Reach 5 Palomar Airport Rd to Poinsettia Station	X																						X						
Coastal Rail Trail San Diego – UTC to Rose Canyon			X																						X				
San Diego River Bikeway Connections											X																		
Santee – El Cajon Corridor											X																		
<b>Complete Corridors</b>																													
I-15 (SR 52)					X																								
SR 125 (Jamacha Road to Amaya Drive)																		X											
SR 163 (I-805 to SR 52)	X				X																								
SR 52 (I-15 to Mast Boulevard)											X																		
SR 52 (I-805 to I-15)	X		X		X																								
SR 52 (Mast Boulevard to SR 125)											X																		
SR 78 (I-5 to Twin Oaks)	X																												
I-15 (Clairemont Mesa Boulevard)					X																								
I-15 (I-8 to SR 163)					X																								
I-5 (H Street to Pacific Highway)						X																							
I-5 (I-805 to SR 56)												X																	
<b>Transit Leap</b>																													
LRT 399																X													
Commuter Rail 398	X		X								X																		

<sup>1</sup> Species potential impact based on known locations existing data sources (e.g., CNDDDB, SANDAG) and presence of suitable habitat. Listed species not shown are not anticipated to be impacted.

<sup>2</sup> Transportation network improvements not listed are not anticipated to impact listed plant species.

# **Attachment 3**



# HAMILTON BIOLOGICAL

April 27, 2024

City of San Diego Planning Department  
9485 Aero Drive, M.S. 413  
San Diego, CA 92123  
E-Mail: [planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)

**SUBJECT: COMMENTS ON BIOLOGICAL RESOURCE ISSUES:  
DRAFT PROGRAM EIR FOR BLUEPRINT SD INITIATIVE,  
HILLCREST FOCUSED PLAN AMENDMENT TO THE UPTOWN  
COMMUNITY PLAN, AND UNIVERSITY COMMUNITY PLAN AND  
LOCAL COASTAL PROGRAM UPDATE**

Dear City of San Diego Planning Department,

Friends of Rose Canyon is a community organization concerned with the protection of sensitive natural resources in Rose Canyon Open Space Park, and other sensitive habitat areas within the UCP planning area, consistent with existing regulations. At the request of Friends of Rose Canyon, Hamilton Biological has reviewed the Draft Program EIR for the *Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update* (hereafter the "DPEIR"). Hamilton Biological's review includes the *Biological Resources Report, University Community Plan Update, City of San Diego, San Diego County, California*, dated March 2024, prepared for the City of San Diego (the City) by Busby Biological Services, Inc. (Busby [2024] or the Busby Report).

O4-30

## OVERVIEW OF MSCP AND MHPA

The San Diego Multiple Species Conservation Program (MSCP) Subarea Plan (City of San Diego 1997) was prepared pursuant to an outline developed by the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) – collectively referred to as the "wildlife agencies" – to satisfy the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. The Subarea Plan forms the basis for the Implementing Agreement, which is the contract between the City and the wildlife agencies that ensures implementation of the Subarea Plan and thereby allows the City to issue take permits at the local level. The Subarea Plan also qualifies as a stand-alone document to implement the City's portion of the MSCP preserve.

O4-31

The City of San Diego Multi-Habitat Planning Area (MHPA) was developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA delineates core biological resource areas and corridors targeted for conservation. The MHPA represents a “hard line” preserve, in which boundaries have been specifically determined. It is considered an urban preserve which is constrained by existing or approved development, and is comprised of linkages connecting several large areas of habitat.

O4-31  
cont.

## PROPOSED ACTIONS CONFLICT WITH MSCP PRIORITY 1 MANAGEMENT DIRECTIVE NO. 2 AND WOULD HAVE SIGNIFICANT ADVERSE EFFECTS ON SENSITIVE BIOLOGICAL RESOURCES

The MSCP Subarea Plan commits the City to following several specific management directives. As acknowledged on page 4.10-44 of the DPEIR:

Those actions identified as Priority 1 are **required to be implemented** by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. [emphasis added in bold]

O4-32

Priority 1 Management Directive No. 2 requires the City to “Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA.” In violation of this MSCP requirement, the Figure 3-26 in DPEIR (Figure 27 in the Draft University Community Plan Update, hereinafter referred to as “the Project”) proposes the establishment of several new formal trails through extremely sensitive habitat areas. On April 16, 2024, I visited the project area to see and photograph several areas of sensitive MHPA proposed for trail impacts in the University Community Plan area and covered under the DPEIR.

### University Village Park to Genesee Avenue

The DPEIR (Figure 3-26) proposes to establish approximately 1.5 miles of formal trail from University Village Park north and west through existing MHPA conserved lands in the Rose Canyon watershed. The area proposed for establishing the new, formal trail is now served by a narrow, informal trail that passes through sensitive and minimally disturbed coastal sage scrub, chaparral, and riparian natural communities. During my site visit on April 16, 2024, I observed a pair of the federally threatened Coastal California Gnatcatcher (*Polioptila californica californica*) in this area, as well as extensive stands of Nuttall’s Scrub Oak (*Quercus dumosa*), a species with a California Rare Plant Ranking (CRPR) of 1B.1, referring to species “threatened, or endangered in California and elsewhere; seriously threatened in California.” As shown in the following Exhibit 1 and Photos 1–11, there would be no way to establish 1.5 miles of formal trail through this area without incurring large-scale significant impacts to these and other sensitive natural resources in direct violation of MSCP Priority 1 Management Directive No. 2.

O4-33





**Exhibit 1.** Showing the locations of 11 photos depicting current habitat and trail conditions in the Rose Canyon watershed, University Village Park to Genesee Avenue. The image is oriented with North at the left margin, South at the right margin, East at the top margin, and West at the bottom. All photos by Robert Hamilton, April 16, 2024.

**O4-33  
cont.**



**Photo 1.** View to southwest showing the existing narrow, informal trail through sensitive coastal sage scrub habitat. I observed a pair of California Gnat-catchers here at the time of this photo.





**Photo 2.** View to southwest showing a narrow, informal trail through sensitive coastal sage scrub habitat, next to a seasonal drainage.



**Photo 3.** View to north showing narrow, informal trail through sensitive coastal sage scrub and chaparral habitat.

O4-33  
cont.





**Photo 4.** Blossoms of checkerbloom (*Sidalcea malviflora*), a native perennial herb typically found in minimally disturbed riparian habitats.

**Photo 5.** Underside of the leaf of Nuttall's Scrub Oak, a species considered "threatened, or endangered in CA and elsewhere; seriously threatened in California." This species grows in dense stands in the areas shown from Photo 5 through Photo 11. Any trail "improvements" through this area, as proposed in the DPEIR, would necessarily impact large numbers of this highly sensitive plant species.



O4-33  
cont.





**Photo 6.** Photo, facing north, showing narrow, informal trail through sensitive coastal sage scrub and Nuttall's Scrub Oak habitat.

**O4-33  
cont.**

**Photo 7.** A large, healthy specimen of Chalk Dudleya (*Dudleya pulverulenta*) growing with Sticky Monkeyflower (*Diplacus puniceus*), further evidence of intact, minimally disturbed habitat along the existing informal trail.







**Photo 8.** View to the north showing the narrow, informal trail passing through sensitive Nuttall's Scrub Oak and riparian habitat.

O4-33  
cont.

**Photo 9.** Dense stand of Nuttall's Scrub Oak immediately south of the existing informal trail that runs along and through the bottom of Rose Canyon.







**Photo 10.** View to the east showing how the existing informal trail runs straight into the streambed in the bottom of Rose Canyon. Any effort to establish a formal trail here would require impacting the streambed and/or adjacent sensitive habitats (see Photos 9, 11).

**O4-33  
cont.**

**Photo 11.** View to the east showing that the existing informal trail disappears into the streambed in the bottom of Rose Canyon. Any effort to establish a formal trail here would require impacting the streambed and/or adjacent sensitive habitats.



The DPEIR fails to disclose the general magnitude of impacts proposed to special-status species, such as the California Gnatcatcher and Nuttall's Scrub Oak, that are known or likely to occur in the proposed trail impact area.

O4-34

The DPEIR also fails to describe a credible and feasible mitigation approach that would reduce impacts to special-status species and natural communities to less than significant.

O4-35

In the DPEIR's impact analysis, Issue 5, Conservation Planning, asks:

Would the project conflict with the provisions of the MSCP, VPHCP, other an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, such as introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects or introduce invasive species of plants into a natural open space area?

In response, the DPEIR asserts on page 4.3-60: "The Blueprint SD Initiative, Hillcrest FPA, and University CPU do not propose policies that would conflict with the MSCP." The proposed establishment of 1.5 miles of formal trail through the sensitive habitats shown in Photos 1-11 would conflict with Priority 1 Management Directive No. 2 of the MSCP Subarea Plan, which requires trails to be located "in the least sensitive areas of the MHPA." Because the MSCP Subarea Plan requires the City to implement all Priority 1 directives as a condition of the MSCP Take Authorization, the proposed formal trail between University Village Park and Genesee Avenue, and the other proposed trails discussed in this report, must be removed from the DPEIR. Failure to remove the trails will cause the Project to conflict with the MSCP, and will result in significant impacts to multiple special-status species and sensitive/protected natural communities.

O4-36

Page 4.3-61 of the DPEIR promises, "Future site-specific developments are required to demonstrate compliance with the City's MSCP thereby ensuring potential impacts associated with conflicts with the MSCP would be less than significant." The City's assurances of future compliance lack credibility. For reasons discussed herein, constructing *any* formal trail through this area would violate the Subarea Plan's most important Priority 1 Management Directive, thus negating any potential to demonstrate compliance with the MSCP.

O4-37

Furthermore, as reported on page 109 of Appendix D to the DPEIR, the MSCP Subarea Plan requires: "Where the MHPA's Urban Habitat Lands are part of a natural resource park, the City Park and Recreation Department shall manage these lands in accordance with a Natural Resource Management Plan (NRMP)." Yet, for 27 years, the City has managed the Rose Canyon Open Space Park without benefit of an NRMP.

Agency-approved NRMPs must be prepared for Rose Canyon, Nobel Hill, and all of the City's other natural resource parks, and all trails proposed in sensitive habitat areas must be removed from the project. Until both of these MSCP requirements have been satisfied, the City has no basis for assuring the public that all proposed project actions will comply with the MSCP and other applicable conservation plans.

O4-38



## Nobel Hill

This area supports the federally threatened California Gnatcatcher (I observed a pair there during my site visit on April 16, 2024) and 38 acres of vernal pools designated as Critical Habitat for the federally threatened Spreading Navarretia (*Navarretia fossalis*). The DPEIR (Figure 3-26) proposes to convert approximately 0.3 mile of existing informal trail through this sensitive habitat area into formal trail, and to eliminate one informal trail. Exhibit 2 and Photos 12-14 show existing conditions in this area. Because the proposed trail would be located through sensitive habitat areas, it would conflict with the MSCP.



O4-39

**Exhibit 2.** Showing the locations of three photos depicting current habitat and trail conditions in the Nobel Hill area. Note the extensive network of illegal trails. All photos by Robert Hamilton, April 16, 2024.



**Photo 12.** View to the northwest showing the existing informal trail up Nobel Hill that would be converted to a formal trail. The adjacent habitat is coastal sage scrub.

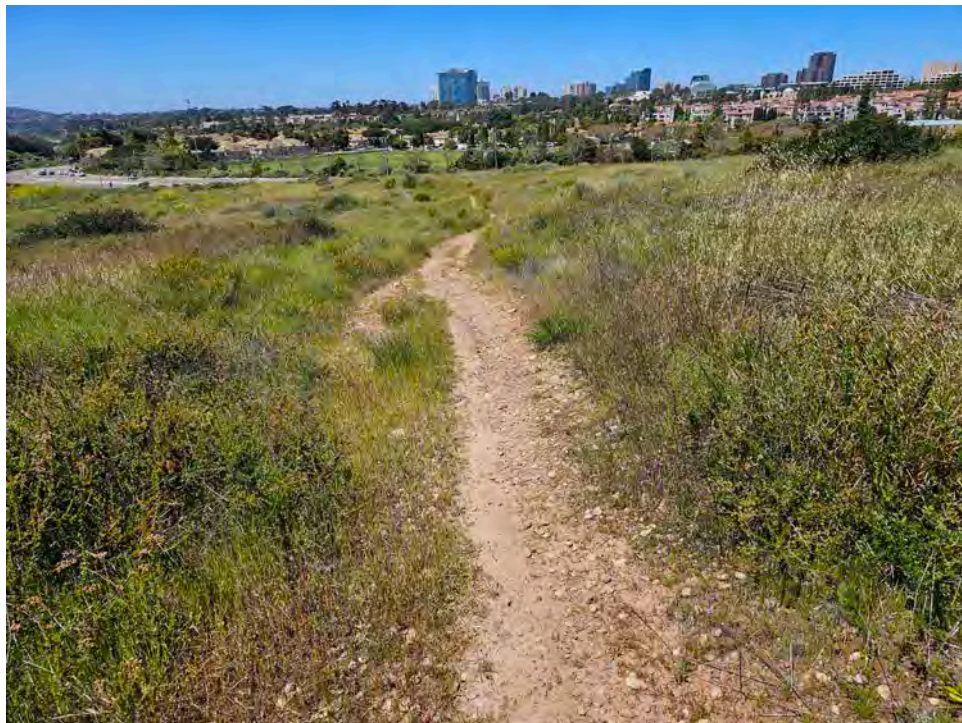




**Photo 13.** View to north showing the existing informal trail through sensitive coastal sage scrub and chamise chaparral habitats. I observed a pair of California Gnatcatchers in this patch of chamise at the time of this photo.

**O4-39  
cont.**

**Photo 14.** View to northwest showing the existing informal trail through sensitive grass/scrub habitat.



As discussed on page 9 of this letter, the MSCP is predicated upon the City managing important urban habitat areas, such as Nobel Hill, under Natural Resource Management Plans that the City is required to prepare. In the absence of the required plans, and enforcement efforts, we see the unchecked creation of more and more illegal trails through sensitive MHPA – sensitive lands putatively conserved under the MSCP. The Nobel Hill conservation area is crisscrossed by numerous illegal trails that seriously degrade and fragment the sensitive resources in this important area (see Exhibit 2 on page 10 of this letter). The City has taken no meaningful actions to reduce or otherwise mitigate these threats to the sensitive resource in this natural area. The Project, however, proposes to close only one of these illegal trails. Allowing these informal trails to remain is having substantial adverse effects on special status species that will increase over time.

O4-40

Failure of the DPEIR to designate all illegal trails for closure also conflicts with the MSCP Priority 1 Policy #1, which requires barriers and signage to direct public access away from sensitive areas.

The DPEIR's proposed establishment of a formal trail through the Nobel Hill conservation area would only increase human traffic into this sensitive, unmanaged area. This would predictably lead to the creation of even more unauthorized trails through the habitat, with potentially significant adverse effects upon the California Gnatcatcher, Spreading Navarretia, San Diego Fairy Shrimp (*Branchinecta sandiegonensis*), Orcutt's Brodiaea (*Brodiaea orcuttii*), and numerous other special-status plant and wildlife species found on Nobel Hill.



## Proposed New Trails to Lower Rose Canyon Trail

The DPEIR identifies completely new trails, one from the southern terminus of Governor Drive and the other from Marcy Neighborhood Park, that would connect to the lower end of the Rose Canyon Trail in the Rose Canyon Open Space Park. As shown in Exhibit 3 and Photos 15–20, both trail alignments would pass through sensitive wetlands, native grasslands, and coastal sage scrub, incurring massive and significant impacts to these and other sensitive natural resources. This would be a significant biological impact under all five significance thresholds identified in the DPEIR. It is also a significant biological impact because it is in direct violation of MSCP Priority 1 Management Directive No. 2.



O4-41

**Exhibit 3.** Showing in red the two proposed trail alignments, one from the end of Governor Drive (Photos 15–17) and the other from Marcy Neighborhood Park (Photos 18–20). All photos by Robert Hamilton, April 16, 2024.





**Photo 15.** View to southeast showing sensitive coastal sage scrub habitat where the DPEIR proposes a new trail from Governor Drive to the lower Rose Canyon Trail.



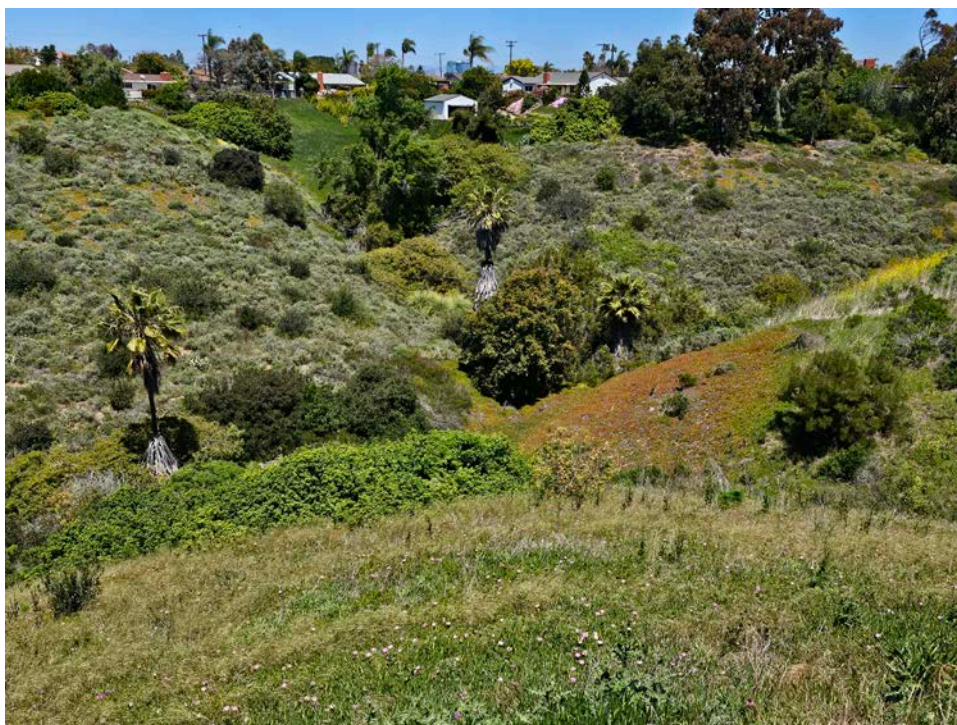
**Photo 16.** View to southwest showing sensitive coastal sage scrub and riparian habitat where the DPEIR proposes a new trail from Governor Drive to the lower Rose Canyon Trail.

O4-41  
cont.





**Photo 17.** View to west showing sensitive coastal sage scrub and riparian habitat where the DPEIR proposes a new trail from Governor Drive to the lower Rose Canyon Trail.



**Photo 18.** View to northeast showing sensitive coastal sage scrub, riparian, and grassland habitat where the DPEIR proposes a new trail from Marcy Neighborhood Park to the lower Rose Canyon Trail.

**O4-41  
cont.**





**Photo 19.** View to northwest showing sensitive coastal sage scrub, riparian, and grassland habitat where the DPEIR proposes a new trail from Marcy Neighborhood Park to the lower Rose Canyon Trail.



**Photo 20.** View to northwest showing sensitive coastal sage scrub and riparian habitat where the DPEIR proposes a new trail from Marcy Neighborhood Park to the lower Rose Canyon Trail.

**O4-41  
cont.**

As described by a local resident, Deborah Knight (in litt.):

The canyons there are incredibly steep and are crisscrossed by huge, deep erosion gullies caused by storm drain pipes that empty out from the streets along the edges of development. This causes wide erosion gullies that are 8-10' deep and simply uncrossable. These crisscross the whole area. Topo maps should show how steep the terrain is in areas. A few of us tried to walk these two trails several years ago. We tried to walk from the west end of Governor down, and found it nearly impossible to walk due to how steep the slope is, and the fact that we had to repeatedly climb down into deep erosion gullies and back up again. We made it only a small distance of the way in over an hour. We tried to walk from the bottom up of the proposed trail alignment from Stresemann St., and that was also literally impossible to walk - a giant erosion gully about 8' deep and 10' across, and then slopes so steep we could barely keep our footing. We stopped less than half way up.

Due to their prohibitive topography, sensitive natural communities, and lack of substantial trails, these two side-canyons to Rose Canyon currently provide habitat for those wildlife species that are most sensitive to habitat fragmentation, human presence (hiking, cycling), and presence of dogs. Constructing new trails through these important areas of refuge would not only directly contradict Priority 1 Management Directive No. 2 of the MSCP Subarea Plan, which requires trails to be located "in the least sensitive areas of the MHPA," but such an undertaking would be antithetical to the MSCP's most basic conservation goals. By identifying these potential new trail alignments in the DPEIR, the City demonstrates a lack of understanding about the MSCP, MHPA, and the City's conservation responsibilities under the MSCP.

If these proposed new trails remain in the proposed Project, they will have substantial adverse effect upon sensitive riparian, coastal sage scrub, and grassland habitats, federally protected wetlands, and wildlife nursery sites. The edge effects and habitat fragmentation effects associated with these new trails would be massive. The DPEIR should disclose and evaluate all of these significant impacts in detail.

### **Proposed New Trail Between Campus Point Drive and Towne Centre Drive**

The DPEIR (Figure 3-26) identifies another new trail through sensitive coastal sage scrub habitat east of Campus Point Drive and northwest of Towne Centre Drive, all of which is designated as MHPA. This would cause significant impacts to sensitive coastal sage scrub habitat and associated special-status species, such as the California Gnatcatcher, and it would violate Priority 1 Management Directive No. 2 of the MSCP Subarea Plan, which requires trails to be located "in the least sensitive areas of the MHPA."

O4-42

O4-43



## DPEIR PROVIDES INADEQUATE AND ERRONEOUS INFORMATION ON LOCATIONS OF SPECIAL-STATUS PLANT AND WILDLIFE SPECIES

The DPEIR provides inadequate, and in some cases erroneous, information on the locations where special-status plant and wildlife species are known or likely to occur within the project area. Page 4.3-23 states:

The Biological Resources Report completed for the University CPU (Appendix D) identified 47 sensitive plant species either known to occur or with a potential to occur within the University CPU area. Refer to Table 4 of Appendix D for additional information regarding the sensitive plant species that occur or have a potential to occur within the University CPU area.

Page 4.3-27 states:

The Biological Resources Report completed for the University CPU (see Appendix D) identified 37 sensitive wildlife species either known to occur or with a potential to occur within the University CPU area. Refer to Table 6 of Appendix D for sensitive species with a potential to occur within the University CPU area.

Referring to Appendix D, the reader finds Table 4, "Sensitive Plant Species with a Potential to Occur in the UCPA" and Table 6, "Sensitive Wildlife Species with a Potential to Occur in the UCPA." These tables provide only vague information on the locations where various special-status species are known or expected to occur within the University CPU planning area. For example, the status of Nuttall's Scrub Oak, a highly sensitive species with an important population in Rose Canyon, is given as follows:

**Present.** Known from many historical locations scattered throughout the UCPA and 1-mile buffer (Alden 2023; Calflora 2023; CDFW 2023a; HELIX 2022; RECON 2023; SDNHM 2023). May occur in other suitable habitat within the UCPA.

As documented in this letter, the DPEIR's proposal to establish approximately 1.5 miles of formal trail from University Village Park north and west through existing MHPA conserved lands in the Rose Canyon watershed would unavoidably impact dense, intact stands of Nuttall's Scrub Oak. Readers of the DPEIR are not given any useful information on the known distribution of Nuttall's Scrub Oak within the DPEIR planning area, on the locations of the most important stands of this rare plant, or on the general magnitude of impacts to this species anticipated from creating the proposed formal trail through Rose Canyon. **In fact, the DPEIR gives no indication that the proposed trail would impact Nuttall's Scrub Oak at all.** The same is true for all sensitive species, such that readers have no way of evaluating the potential adverse effects of constructing any of the trails proposed in the DPEIR.

Table 5 on page 76 of Appendix D characterizes the Least Bell's Vireo (*Vireo bellii pusillus*), a species listed as endangered by federal and state governments, as "not expected" as a nesting species in the UCP planning area despite potentially suitable riparian habitat in Rose Canyon and scattered smaller pockets of riparian vegetation elsewhere in the planning area. In comments submitted to the City on the UCP Community Discussion Draft dated June 29, 2023, I noted that, from May 15 to July 19, 2021, birders P.J. Nell

O4-44

O4-45

and Jim Roberts repeatedly observed Least Bell's Vireos in Rose Canyon, including an adult feeding a begging juvenile on July 5 (<https://ebird.org/checklist/S91321310>) and July 9 (<https://ebird.org/checklist/S91518140>). My earlier letter included these links to the eBird checklists. The observations of Mr. Nell and Mr. Roberts contradict the DPEIR's determination that the Least Bell's Vireo can be excluded from analysis because this listed species is "not expected" within the project area.

O4-45  
cont.

The California Natural Diversity Data Base (CNDDDB) provides maps showing the locations where special-status plants and wildlife have been documented. CEQA practitioners routinely use these occurrence maps to prepare adequate CEQA documents. The Final PEIR (FPEIR) should include maps from CNDDDB showing the locations in the project area where special-status species have been documented, and the FPEIR's impact analysis should identify any and all special-status species known or likely to occur within proposed impacts areas. The FPEIR's impact analysis should take this relevant information into account to avoid or minimize any potentially significant impacts to special-status plant and wildlife species.

O4-46

## DPEIR'S IMPACT ANALYSIS PROVIDES INADEQUATE DETAIL TO EVALUATE IMPACTS OR TO IDENTIFY LESS-DAMAGING ALTERNATIVES

On a practical level, it makes little difference whether the EIR preparer has included or excluded the Least Bell's Vireo or any other special-status species from the DPEIR, because the impact analysis in Section 4.3 fails to describe or analyze the potential effects of any proposed action on any special-status species.

See, for example, the analysis of impacts to sensitive plants on page 4.3-53 of the DPEIR:

As future site-specific projects are proposed, implementation of the City's regulatory framework for addressing biological resources impacts including the MSCP SAP, VPHCP, ESL Regulations, and Biology Guidelines would reduce potential impacts to sensitive plant species. However, at a program level of review and in the absence of project specific analysis, it is unknown whether all impacts to sensitive plant species would be fully mitigated to a less than significant level. **Therefore, at the program level of review, impacts to sensitive plant species resulting from project implementation would be significant.** [emphasis added in bold]

O4-47

The same generic approach applies to sensitive wildlife (DPEIR at page 4.3-54):

As future site-specific projects are proposed, implementation of the City's regulatory framework for addressing biological resources impacts including the MSCP SAP, VPHCP, ESL Regulations and Biology Guidelines would reduce potential impacts to sensitive wildlife species. However, at a program level of review and in the absence of project specific analysis, it is unknown whether all impacts to sensitive wildlife species would be fully mitigated to a less than significant level. **Therefore, at the program level of review, impacts to sensitive wildlife species resulting from project implementation would be significant.** [emphasis added in bold]

The same generic approach applies to critical habitats (DPEIR at page 4.3-55):

Future development anticipated under the project that could potentially impact designated critical habitat would be required to comply with the applicable avoidance, minimization, and mitigation measures of the MSCP SAP and VPHCP, as well as the regulatory requirements of the MSCP SAP, ESL Regulations, and Biology Guidelines. As future site-specific projects are proposed, implementation of the City's regulatory framework for addressing biological resources impacts including the MSCP SAP, VPHCP, ESL Regulations and Biology Guidelines would reduce potential impacts to designated critical habitats. However, at a program level of review and in the absence of project specific analysis, it is not possible to ensure all impacts could be fully mitigated to a less than significant level. **Therefore, at the program level of review, impacts to critical habitat would be significant.** [emphasis added in bold]

The same generic approach applies to sensitive habitats (DPEIR at page 4.3-57):

Required compliance with the established development standards contained in the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP would reduce potential impacts on sensitive vegetation communities resulting from future development. However, at a program level of review without project specific development proposals, it is cannot be guaranteed that every impact to sensitive habitats can be fully to a less than significant level. **Therefore, at the program level of review, impacts to sensitive habitats would be significant.** [emphasis added in bold]

O4-47  
cont.

The same generic approach applies to wetlands (DPEIR at page 4.3-59):

In addition to the City regulatory requirements, all impacts on wetlands or other jurisdictional areas would be subject to regulation by the U.S. Army Corps of Engineers in accordance with Section 404 of the CWA, Regional Water Quality Control Board in accordance with Section 401 of the CWA, and CDFW under Section 1600 of California Fish and Game Code, as applicable. As no specific projects have been identified, it cannot be guaranteed that every future project would be able to demonstrate no net loss of wetland habitat. **Therefore, at a program level of review, impacts would be significant.** [emphasis added in bold]

The purpose of a Program EIR, or any CEQA document, is not simply to acknowledge that potentially significant impacts may occur from future actions, but to give the public and decision-makers adequate information upon which to evaluate the environmental costs of one or more proposed actions. Would a proposed trail wipe out one Nuttall's Scrub Oak or would it eviscerate a major grove of Nuttall's Scrub Oaks? Both impacts would be considered significant, but their magnitudes and regulatory implications are vastly different. The DPEIR is deficient in not providing the public and decision-makers with enough information to reach informed opinions about the environmental costs of the proposed actions.

Section 15126.6(a) of the CEQA Guidelines requires the lead agency to provide meaningful analysis of alternatives that "would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project." Section 15126.6(b) requires the lead agency to "focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." By providing only vague

O4-48

information about the distribution of special-status plant and wildlife species in the project area, and issuing only generic acknowledgments of significant impacts to various broad categories of resources (sensitive plants, sensitive wildlife, sensitive habitats, etc.), the DPEIR fails to explain whether or how the project's basic objectives could be accomplished while avoiding or substantially lessening any significant adverse effects of the project. This is another serious inadequacy of the DPEIR as a CEQA document.

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cont.

### **DPEIR Provides No Information Regarding Fragmentation, Edge, and Recreation/Trail Effects**

Without adequate protection, the ecological value of urban habitats designated as MHPA will degrade over time due to habitat fragmentation, edge effects, and recreation/trail effects. The City did not take these effects into account before proposing new formal trails within the MHPA. Because the DPEIR provides almost no information about these categories of adverse effects, the information is provided here.

O4-49

#### *Fragmentation and Edge Effects*

Urbanization typically includes residential, commercial, industrial, and road-related development (i.e., the "built" environment). At the perimeter of the built environment is an area known as the urban/wildland interface, or "development edge." In ecology, "edges" are places where natural communities interface, vegetation or ecological conditions within natural communities interact (Noss 1983), or patches with differing qualities abut one another (Ries and Sisk 2004). "Edge effects" are spillover effects from the adjacent human-modified matrix that cause physical gradients in light, moisture, noise, etc. (Camargo and Kapos 1995; Murcia 1995, Sisk et al. 1997) and/or changes in biotic factors such as predator communities, density of human-adapted species, and food availability (Soulé et al. 1988; Matlack 1994; Murcia 1995; Ries and Sisk 2004).

Edge effects and habitat fragmentation are among the principal threats to persistence of biological diversity (Soulé 1991). Edge-related impacts may include:

O4-50

- Introduction/expansion of invasive exotic vegetation carried in from vehicles, people, animals or spread from backyards or fuel modification zones adjacent to wildlands.
- Higher frequency and/or severity of fire as compared to natural fire cycles or intensities.
- Companion animals (pets) that often act as predators of, and/or competitors with, native wildlife.
- Creation and use of undesignated trails that often significantly degrade the reserve ecosystems through such changes as increases in vegetation damage and noise.
- Introduction of or increased use by exotic animals which compete with or prey on native animals.



- Influence on earth systems and ecosystem processes, such as solar radiation, soil richness and erosion, wind damage, hydrologic cycle, and water pollution that can affect the natural environment.

Any of these impacts, individually or in combination, can result in the effective loss or degradation of habitats used for foraging, breeding or resting, with concomitant effects on population demographic rates of sensitive species.

Harrison and Bruna (1999) completed a review of a suite of studies dealing with fragmentation and edge effects and concluded that there is a general pattern of reduction of biological diversity in fragmented habitats compared with more intact ones, particularly with regard to habitat specialists. While physical effects associated with edges were predominant among species impacts, they found evidence for indirect effects including altered ecological interactions. Fletcher et al. (2007) found that distance from edge had a stronger effect on species than did habitat patch size, but they acknowledged the difficulty in separating those effects empirically. Many southern California plant and animal species are known to be sensitive to fragmentation and edge effects; that is, their abundance declines with fragment size and proximity to an edge (Wilcove 1985; Soulé et al. 1992; Bolger et al. 1997a,b; Suarez et al. 1998; Burke and Nol 2000).

Wildlife populations are typically changed in proximity to edges, either by changes in their demographic rates (survival and fecundity), or through behavioral avoidance of or attraction to the edge (Sisk et al. 1997; Ries and Sisk 2004). For example, coastal sage scrub areas within 250 meters of urban edges consistently contain significantly less bare ground and more coarse vegetative litter than do more “intermediate” or “interior” areas, presumably due to increased human activity/disturbance of the vegetation structure near edges (Kristan et al. 2003). Increases in vegetative litter often facilitate growth of non-native plants (particularly grasses), resulting in a positive feedback loop likely to enhance plant invasion success (Wolkovich et al. 2009). In another coastal southern California example, the abundance of native bird species sensitive to disturbance is typically depressed within 200 to 500 meters (650 to 1640 feet) of an urban edge, and the abundance of disturbance-tolerant species is elevated up to 1000 meters (3280 feet) from an urban edge, depending on the species (Bolger et al. 1997a).

Habitat fragmentation is usually defined as a landscape scale process involving habitat loss and breaking apart of habitats (Fahrig 2003). Habitat fragmentation is among the most important of all threats to global biodiversity; edge effects (particularly the diverse physical and biotic alterations associated with the artificial boundaries of fragments) are dominant drivers of change in many fragmented landscapes (Laurance and Bierregaard 1997; Laurance et al. 2007).

Fragmentation decreases the connectivity of the landscape while increasing both edge and remnant habitats. Urban and agricultural development often fragments wildland ecosystems and creates sharp edges between the natural and human-altered habitats. Edge effects for many species indirectly reduce available habitat use or utility in surrounding remaining areas; these species experience fine-scale functional habitat losses

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cont.

(e.g., see Bolger et al. 2000; Kristan et al. 2003; Drolet et al. 2016). Losses of coastal sage scrub in southern California have resulted in the increased isolation of the remaining habitat fragments (O'Leary 1990). Fragmentation has a greater relative negative impact on specialist species (e.g., the Coastal Cactus Wren, *Campylorhynchus brunneicapillus*) that have strict vegetation structure and area habitat requirements (Soulé et al. 1992).

Specialist species have an increased risk of extirpation in isolated habitat remnants because the specialized vegetative structures and/or interspecific relationships on which they depend are more vulnerable to disruption in these areas (Vaughan 2010). In studies of the coastal sage scrub and chaparral systems of coastal southern California, fragment area and age (time since isolation) were the most important landscape predictors of the distribution and abundance of native plants (Soulé et al. 1993), scrub-breeding birds (Soulé et al. 1988; Crooks et al. 2001), native rodents (Bolger et al. 1997b), and invertebrates (Suarez et al. 1998; Bolger et al. 2000).

Edge effects that emanate from the human-dominated matrix can increase the extinction probability of isolated populations (Murcia 1995; Woodroffe and Ginsberg 1998). In studies of coastal sage scrub urban fragments, exotic cover and distance to the urban edge were the strongest local predictors of native and exotic carnivore distribution and abundance (Crooks 2002). These two variables were correlated, with more exotic cover and less native shrub cover closer to the urban edge (Crooks 2002).

The increased presence of human-tolerant "mesopredators" in southern California represents an edge effect of development; they occur within the developed matrix and are thus more abundant along the edges of habitat fragments, and they are effective predators on birds, bird nests, and other vertebrates in coastal sage scrub and chaparral systems and elsewhere (Crooks and Soulé 1999). The mammalian carnivores more typically detected in coastal southern California habitat fragments are resource generalists that likely benefit from the supplemental food resources (e.g., garden fruits and vegetables, garbage, direct feeding by humans) associated with residential developments. As a result, the overall mesopredator abundance, of such species as raccoons (*Procyon lotor*), opossums (*Didelphis virginiana*), and domestic cats (*Felis catus*), increases at sites with more exotic plant cover and closer to the urban edge (Crooks 2002). Although some carnivores within coastal sage scrub fragments seem tolerant of disturbance, many fragments have (either actually or effectively) already lost an entire suite of predator species, including mountain lion, bobcats (*Lynx rufus*), spotted skunks (*Spilogale gracilis*), long-tailed weasels (*Mustela frenata*), and badgers (*Taxidea taxus*) (Crooks 2002). Most "interior" sites within such fragments are still relatively near (within 250 meters of) urban edges (Crooks 2002).

Fragmentation generally increases the amount of edge per unit land area, and species that are adversely affected by edges can experience reduced effective area of suitable habitat (Temple and Cary 1988), which can lead to increased probability of extirpation/extinction in fragmented landscapes (Woodroffe and Ginsberg 1998). For example, diversity of native bees (Hung et al. 2015) and native rodents (Bolger et al. 1997b) is lower, and decomposition and nutrient cycling are significantly reduced (Treseder and

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cont.

McGuire 2009), within fragmented coastal sage scrub ecosystems as compared to larger core reserves. Similarly, habitat fragmentation and alterations of sage scrub habitats likely have reduced both the genetic connectivity and diversity of coastal-slope populations of the Cactus Wren in southern California (Barr et al. 2015). Both Bell's Sparrows (*Artemisiospiza belli*) and California Thrashers (*Toxostoma redivivum*) show strong evidence of direct, negative behavioral responses to edges in coastal sage scrub; that is, they are edge-averse (Kristan et al. 2003), and California Thrashers and California Quail (*Callipepla californica*) were found to be more vulnerable to extirpation with smaller fragment size of the habitat patch (Bolger et al. 1991), demonstrating that both behavioral and demographic parameters can be involved. Other species in coastal sage scrub ecosystems, particularly the Cactus Wren and likely the California Gnatcatcher and San Diego Pocket Mouse (*Chaetodipus fallax*), are likely vulnerable to fragmentation, but for these species the mechanism is likely to be associated only with extirpation vulnerability from habitat degradation and isolation rather than aversion to the habitat edge (Kristan et al. 2003). Bolger (et al. 1997b) found that San Diego coastal sage scrub and chaparral canyon fragments under 60 acres that had been isolated for at least 30 years support very few populations of native rodents, and they suggested that fragments larger than 200 acres in size are needed to sustain native rodent species populations.

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cont.

The penetration of exotic species into natural areas can reduce the effective size of a reserve in proportion to the distance they penetrate within the reserve: Argentine Ants serve as an in-depth example of edge effects and fragmentation. Spatial patterns of Argentine Ant abundance in scrub communities of southern California indicate that they are likely invading native habitats from adjacent developed areas, as most areas sampled greater than 200 to 250 meters from an urban edge contained relatively few or no Argentine Ants (Bolger 2007, Mitrovich et al. 2010). The extent of Argentine Ant invasions in natural environments is determined in part by inputs of urban and agricultural water run off (Holway and Suarez 2006).

Native ant species were more abundant away from edges and in areas with predominantly native vegetation. Post-fragmentation edge effects likely reduce the ability of fragments to retain native ant species; fragments had fewer native ant species than similar-sized plots within large unfragmented areas, and fragments with Argentine Ant-free refugia had more native ant species than those without refugia (Suarez et al. 1998). They displace nearly all surface-foraging native ant species (Holway and Suarez 2006) and strongly affect all native ant communities within about 150 to 200 meters from fragment edges (Suarez et al. 1998; Holway 2005; Fisher et al. 2002; Bolger 2007; Mitrovich et al. 2010). Argentine Ants are widespread in fragmented coastal scrub habitats in southern California, and much of the remaining potential habitat for Blainville's Horned Lizards (*Phrynosoma blainvillii*) is effectively unsuitable due to the penetration of Argentine Ants and the subsequent displacement of the native ant species that horned lizards need as prey (Fisher et al. 2002). Invasion of Argentine Ants into coastal sage scrub has also shown a strong negative effect on the abundance of the Gray Shrew (*Notiosorex crawfordi*) (Laakkonen et al. 2001).

### *Recreation and Trail Effects*

In the introduction to their study on the efficacy and perception of trail use enforcement at the 866-acre Del Mar Mesa Preserve in the City of San Diego, Greer et al. (2017:56-57) briefly summarized adverse effects of recreation upon ecological functions and values:

The field of Recreation Ecology studies the impacts of recreation users on various biotic and abiotic elements of the landscape. Studies have shown that various types of passive outdoor recreation can result in displacement and reduction of wildlife, the trampling of native habitat and species, impacts to soil and water resources [although] users may not be aware of their impacts or legality of their actions. This balance between recreational use and natural resource conservation has become a key element of land management around the world. [citations omitted]

Greer et al. (2017) evaluated different approaches to resolving problems associated with creation, use, and maintenance of unpermitted trails at the Del Mar Mesa Preserve, activities that had fragmented and degraded the Preserve's natural communities for at least a decade at that time. They concluded, in part:

This Study showed that soft enforcement aimed at public education and redirecting social norms was not sufficient in curbing illegal trail use in an urban natural area. The movement towards citations and the threat of citations was effective at redirecting behavior by making non-compliance more risky. This in turn had an unintended consequence of promoting hostility amongst a large user base.

The long-standing resource management problems associated with illegal trails at the Del Mar Mesa Preserve persist, with no clear resolution in sight (e.g., Karen Billing, San Diego Union Tribune, July 6, 2022: *Del Mar Mesa Preserve Tunnel Trail Vandalized* <https://www.sandiegouniontribune.com/local/story/2022-07-06/del-mar-mesa-preserve-trail-vandalized>).

## **SUMMARY AND CONCLUSION**

MSCP planners, recognizing the tremendous challenge of maintaining important ecological values in a highly fragmented landscape over long periods of time, developed the Management Policies and Directives specifically to establish guardrails against further fragmentation and degradation of the few natural areas that remain. Specifically, the Subarea Plan requires trails be sited "in the least sensitive areas of the MHPA." Disregarding these existing commitments, the DPEIR targets for the establishment of formal trails some of the least disturbed, most-intact blocks of sensitive habitats in the MHPA.

Furthermore, where the MHPA's Urban Habitat Lands are part of a natural resource park, the Subarea Plan requires that the City manage these lands in accordance with a Natural Resource Management Plan. The City has not complied in Rose Canyon or at Nobel Hill, and is now proposing additional formal trails from which new illegal trails are likely to stem. Until detailed and adequate biological studies are conducted and enforcement strategies and implementation plans are developed, no new formal trails should be proposed in MHPA within the project area.

O4-51

O4-52



Apart from these problems, the DPEIR fails to provide the public and decision-makers with enough information to reach informed opinions about the environmental costs of the proposed actions. Additionally, by providing only vague information about the distribution of special-status species in the project area, and issuing only generic acknowledgments of significant impacts to various broad categories of resources, the DPEIR fails to explain whether or how the project's basic objectives could be accomplished while avoiding or substantially lessening any significant adverse effects of the project. In these ways, the DPEIR is inadequate as a CEQA document.

O4-53

The available data, and the observations I made during my recent site visit, indicate to me that the proposed trails are likely to have significant adverse effects under each of the five thresholds identified in the DPEIR. Apart from the one-time loss of sensitive habitats from Project grading, the proposed trails would result in ongoing, long-term significant adverse effects to the remaining MHPA due to habitat fragmentation, creation of new habitat edges, and increased recreation/trail effects (as reviewed on pages 21-25 of this letter). These classes of impacts, which would be extensive and unavoidable, are not adequately evaluated or disclosed in the DPEIR. For these reasons, all trails through MHPA should be removed from the Project.

O4-54

If any recipient of this letter has questions, please call me at (562) 477-2181 or send e-mail to [robb@hamiltonbiological.com](mailto:robb@hamiltonbiological.com).

Sincerely,



Robert A. Hamilton  
President, Hamilton Biological, Inc.

cc: David Zoutendyk, USFWS  
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Jonathan Snyder, USFWS  
Susan Wynn, USFWS  
Scott Sobiech, USFWS  
Melanie Burlaza, CDFW  
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# **Attachment 4**





## HAMILTON BIOLOGICAL

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June 29, 2023

UCP Update Project Manager  
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**SUBJECT: COMMENTS ON BIOLOGICAL RESOURCE ISSUES  
UNIVERSITY COMMUNITY PLAN AND LOCAL COASTAL PLAN  
COMMUNITY DISCUSSION DRAFT (APRIL 2023)**

Dear UCP Project Manager,

The Friends of Rose Canyon is a community organization concerned with the protection of sensitive natural resources in Rose Canyon Open Space Park, and other sensitive habitat areas within the UCP planning area, consistent with existing regulations. At the request of the Friends of Rose Canyon, Hamilton Biological has reviewed the University Community Plan and Local Coastal Plan Update (hereafter “UCP/LCP Update” or “UCP”). Hamilton Biological’s review includes the *Biological Resources Report, University Community Plan Update, City Of San Diego, San Diego County, California*, dated June 26, 2020, prepared for the City of San Diego (the City) by Busby Biological Consulting, Inc. (Busby [2020] or the Busby Report).

### **OVERVIEW OF MSCP AND MHPA**

The San Diego Multiple Species Conservation Program (MSCP) was prepared pursuant to an outline developed by the United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW) to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act of 1992. The Subarea Plan forms the basis for the implementing agreement, which is the contract between the City and the wildlife agencies that ensures implementation of the Subarea Plan and thereby allows the City to issue take permits at the local level. The Subarea Plan also qualifies as a stand-alone document to implement the City’s portion of the MSCP preserve.

The City of San Diego Multi-Habitat Planning Area (MHPA) was developed by the City in cooperation with the wildlife agencies, property owners, developers, and environmental groups. The MHPA delineates core biological resource areas and corridors targeted for conservation. The MHPA represents a “hard line” preserve, in which

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boundaries have been specifically determined. It is considered an urban preserve which is constrained by existing or approved development, and is comprised of linkages connecting several large areas of habitat.

### **Subarea Plan Section 1.5.2, General Management Directives**

Section 1.5.2 of the Subarea Plan outlines the plan's general Management Directives that support the MSCP's Conservation Objectives. The Directives are organized by Priority to assist decisions on where to spend limited funds and direct mitigation efforts. Priority 1 refers to Directives that protect management actions needed to adequately protect MSCP-covered species within the MHPA, and Priority 2 refers to Directives that address the long-term conservation actions that can be implemented during the life of the City Subarea Plan as funds become available. The following Priority 1 Directives, from Section 1.5.2 of the Subarea Plan, apply to projects within the UCP planning area.

### **Priority 1 Directives for Public Access, Trails, and Recreation**

1. Provide sufficient signage to clearly identify public access to the MHPA. Barriers such as vegetation, rocks/boulders, or fencing may be necessary to protect highly sensitive areas. Use an appropriate type of barrier based on location, setting, and use. For example, use chain link or cattle wire to direct wildlife movement, and natural rocks/boulders or split rail fencing to direct public access away from sensitive areas. Lands acquired through mitigation may preclude public access to satisfy mitigation.
2. Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary because of the typically heightened resource sensitivity in those locations.
3. In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off trail access and use. Provide trail repair/maintenance as needed. Undertake measures to counter the effects of trail erosion, including the use of stone or wood cross joints, edge plantings of native grasses, and mulching of the trail.
4. Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than four (4) feet in core areas or wildlife corridors. Exceptions are in the San Pasqual Valley, where other agreements have been made; in Mission Trails Regional Park, where appropriate; and in other areas where necessary to safely accommodate multiple uses or disabled access. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.

5. Limit the extent and location of equestrian trails to the less sensitive areas of the MHPA. Locate staging areas for equestrian uses at a sufficient distance (e.g., 300 to 500 feet) from areas with riparian and coastal sage scrub habitats to ensure that the biological values are not impaired.
6. Off-road or cross-country vehicle activity is an incompatible use in the MHPA, except when these vehicles are used for law enforcement, preserve management, or emergency purposes. Restore disturbed areas to native habitat where possible or critical, or allow to regenerate.
7. Limit recreational uses to passive uses such as birdwatching, photography, and trail use. Locate developed picnic areas near MHPA edges or specific areas within the MHPA to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (e.g., opossums, raccoons, skunks). Where permitted, restrain pets on leashes.
8. Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.
9. Maintain equestrian trails on a regular basis to remove manure (and other pet feces) from the trails and preserve system in order to control cowbird invasion and predation. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g., grass-lined) swale or basin to detain runoff and remove pollutants.

A portion of the UCP planning area, including Torrey Pines State Park, lies within the “Northern Area” described in Section 1.2.4 of the Subarea Plan. The Subarea Plan does not identify any additional Management Policies and Directives for this portion of the UCP planning area that warrant discussion in these comments.

Most of the UCP planning area lies within the “Urban Area” described in Section 1.2.3 of the Subarea Plan. The following Management Policies and Directives, from Section 1.5.7 of the Subarea Plan, apply to projects within the “Urban Area” portion of the UCP planning area.

### **Overall Management Policies and Directives for Urban Habitat Lands**

1. Where the MHPA’s Urban Habitat Lands are part of a natural resource park, the City Park and Recreation Department shall manage these lands in accordance with a Natural Resource Management Plan (NRMP). The NRMPs for Urban Habitat Lands include the Marian Bear Memorial Park NRMP, Mission Bay Park NRMP, First San Diego River Improvement Project, and Los Peñasquitos Canyon Preserve NRMP.
2. All other Urban Habitat Lands included within the MHPA should be managed, to the extent possible, according to the general management policies and directives as described in the City Subarea Plan and summarized above.

3. Special management needs or issues for specific Urban Habitat Lands should be resolved by the MHPA Preserve Managers according to an appropriate adaptive management strategy and through coordination with the MSCP habitat management technical committee.

## **UCP PURPOSE AND CONTEXT IS INCOMPLETE AND FLAWED FOR FAILING TO INCORPORATE THE SUBAREA PLAN'S MANAGEMENT POLICIES AND DIRECTIVES**

Page 11 of the UCP (Plan Purpose and Context) lists four citywide policy documents and one regional plan that the City took into account in preparing the UCP:

The policies in this plan are based on several previously adopted citywide policy documents, including the General Plan, Climate Action Plan, Parks Master Plan and Climate Resilient SD. The purpose of this Community Plan is to apply and in some instances tailor the strategies and policies in those plans as appropriate for the University Community. In addition, the regional plan prepared by SANDAG, San Diego Forward, serves as a basis for policies related to mobility and how the University community relates to the region as a whole.

Rather than incorporating the Subarea Plan's adopted Management Policies and Directives into the policies of the UCP, the City treats these requirements as afterthoughts that may be considered in the future, after the UCP has been adopted. For example, page 126 of the UCP states:

Note that trails and recreation on lands subject to the Multi-Habitat Planning Areas (MHPA) should comply with the Multiple Species Conservation Program (MSCP) for compatibility.

Other sections of the UCP state that the ultimate alignments of the new trails proposed within MHPA "shall comply" with the MSCP (versus "should comply"). In either case, the problem is that the UCP proposes trails in areas known to have sensitive biological resources and/or steep topography that would necessitate extensive disturbance for trail construction. The City's approach violates the Subarea Plan as well as Policy PP10 in the City's adopted Parks Master Plan:

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). [emphasis added]

As discussed subsequently in this letter, some or all of the new trails proposed in the UCP cannot possibly be implemented in compliance with the Subarea Plan, regardless of their ultimate alignments. In particular, *Priority 1 Directive No. 2* restricts the construction of trails through sensitive areas:

Locate trails, view overlooks, and staging areas **in the least sensitive areas of the MHPA**. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different



habitat types (ecotones) for longer than necessary because of the typically heightened resource sensitivity in those locations. [emphasis added]

As discussed previously, the City is required to implement all Priority 1 Directives as a condition of its MSCP Take Authorization. Thus the City’s refusal to explicitly incorporate all relevant MSCP Management Policies and Directives into the UCP not only violates the Parks Master Plan and undermines the UCP’s credibility as a planning document, but it puts the City’s MSCP Take Authorization at risk of revocation by the resource agencies.

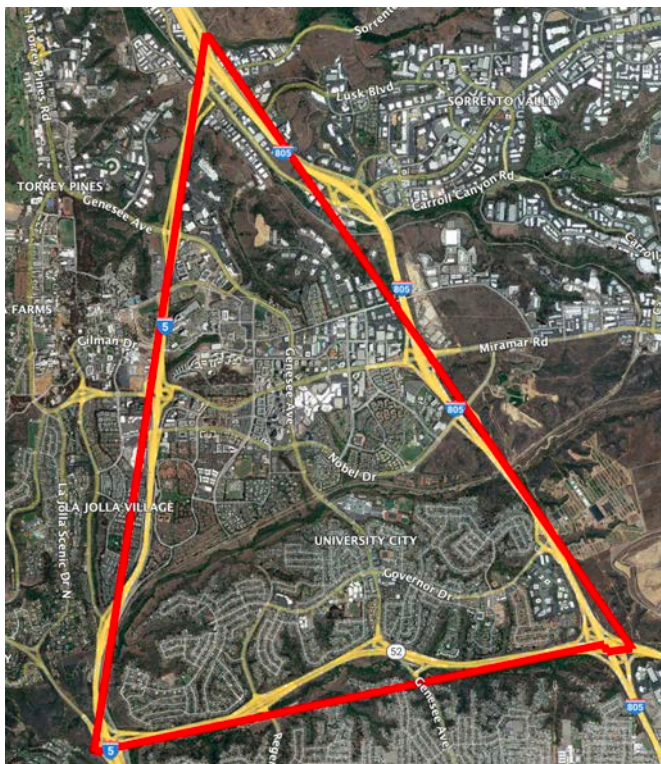
## VISION AND LAND USE FRAMEWORK IGNORES MSCP REQUIREMENTS

Page 17 of the UCP (Vision and Land Use Framework) lists the seven Goals of the plan. None of the UCP’s goals mentions complying with the City’s existing commitment to MSCP land-use planning by implementing the Subarea Plan.

Pages 20–29 of the UCP list 15 Priorities of the plan. One of them, on page 27, touches upon open-space planning:

**Dedicating and Celebrating Open Space:** Open space defines the character of this community. Within this plan there are opportunities to expand open space dedications to ensure their long term conservation. This plan also seeks to strike a balance to allow access for people to appreciate open space and the benefits its protection affords.

This statement implies that the MSCP places too many restrictions on recreational uses within MHPA, and that increased human access into sensitive habitat areas is needed to “strike a balance” between recreation and conservation. Please refer to Exhibit A, below.



**Exhibit A.** For simplicity, this exhibit focuses on the southern part of the UCP planning area—the triangle formed by Interstate 5, Interstate 805, and State Route 52. No ecologist, or other conservation-minded person, looking at this landscape would conclude that building new trails in the few preserved areas not already serviced by formal trails would somehow “strike a balance” between the needs of humans and the needs of sensitive native plant and wildlife species.

As shown in Exhibit A on the previous page, roads and structures occupy nearly all of the hilltops, ridges, and relatively flat grasslands in the southern part of the UCP planning area. The undeveloped canyons that remain (i.e., the MHPA) are crossed by numerous paved roads and laced with an extensive network of trails – authorized or informal – that facilitates access for large numbers of people, bicycles, e-bikes, and dogs.

MSCP planners, recognizing the tremendous challenge of maintaining important ecological values in a highly fragmented landscape over long periods of time, developed the Subarea Plan’s Management Policies and Directives specifically to establish guardrails against further fragmentation and degradation of the few natural areas that remain. Disregarding these *existing conservation mandates*, the UCP targets for new trails precisely the least disturbed, most intact blocks of sensitive habitats in the MHPA. Without irony, the UCP does so in the name of *striking a balance* between habitat conservation and increased human mobility and recreation. The bottom line is that only trails that satisfy all relevant Management Policies and Directives contained in the Subarea Plan are allowable under the MSCP. The UCP must acknowledge that the primary purpose of MHPA lands is resource conservation, with other uses allowed only to the extent they comply with the MSCP Subarea Plan’s Management Policies and Directives.

## **“NATURE BASED PARK” VS. GENERIC “OPEN SPACE”**

Figure 3 on page 31 of the UCP (Planned Land Use) designates Torrey Pines State Natural Reserve as “Nature Based Park” but designates the remaining MHPA as generic “open space.” Under the MSCP Subarea Plan, MHPA represents a “hard line” preserve consisting of core biological resource areas and corridors targeted for conservation. As an objective and straightforward planning document, the UCP should clearly and consistently identify the Subarea Plan’s MHPA open space designations and acknowledge, rather than obfuscate, the City’s conservation commitments wherever they exist in the UCP planning area.

## **URBAN FORESTRY**

The Urban Forestry section of the UCP proposes plantings of the following species of tree known to be invasive in San Diego County<sup>1</sup>: Evergreen Ash (*Fraxinus uhdei*), Chinese Elm (*Ulmus parvifolia*), Red River Gum (*Eucalyptus camadulensis*), and Mexican Fan Palm (*Washingtonia robusta*). No exotic plant species known to be invasive in San Diego County should be planted in the UCP area. Additional plantings of species native to the local area would be appropriate.

Trees should not be planted along roads adjacent to MHPA, as they can shade native scrub habitat, reduce habitat suitability for the California Gnatcatcher and other scrub-dependent wildlife, and provide suitable nesting habitat for the Cooper’s Hawk, an increasingly common raptor that preys mainly on small birds.

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<sup>1</sup> <https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/Landscape/WELDManual-Appendix-I.pdf>

## **OPEN SPACE AND CONSERVATION**

The Open Space and Conservation section of the UCP provides brief summaries of the MSCP and other conservation planning efforts that affect the UCP. Lacking, however, is a straightforward listing of the relevant Management Policies and Directives from the Subarea Plan and a credible determination by the City that any new trails proposed in the UCP comply with all MSCP requirements.

### **TABLE 6: UCP PLAN POLICIES**

Because the City has committed to adhering to all Management Policies and Directives contained in the MSCP Subarea Plan, a reader of the UCP should be able to evaluate the extent to which proposed actions comply with these MSCP requirements. Toward this end, the relevant Management Policies and Directives from the Subarea Plan should be included in the Table 6. Excluding these policies establishes a perceptual gap between what is required under the MSCP and what is being proposed in the UCP, a gap that does not serve any legitimate planning purpose.

### **REVIEW OF BIOLOGICAL RESOURCES REPORT (BUSBY 2020)**

As part of my review, I evaluated the adequacy of the *Biological Resources Report, University Community Plan Update, City of San Diego, San Diego County, California*, (Busby 2020 or the Busby Report) as an informational and analytical document provided in support of the UCP.

#### **Busby Report is Out of Date**

As an initial observation, such reports are generally considered valid for one year after preparation, so the Busby Report is two years out of date.

#### **Busby Report Contains No Analyses**

Page 1 of the Busby Report (Introduction) summarizes the report's purpose:

To inform the UCP update (UCPU), this biological resources report provides a summary of the existing biological resources within the UCP area and assesses potential impacts to these biological resources that may occur through implementation of the updated UCP.

The Busby Report summarizes the regulatory framework of federal, state, and local resource-protection policies and regulations that may be relevant to future impact analyses, but the authors did not use them to analyze the potential effects of implementing the UCP on any natural resource.

Page 41 of the Busby Report (Methods) states, "this UCPU biological resources report is intended to provide a broad-scale analysis of biological resources," but the report includes no impact analysis at any scale.

Given that the Busby Report provides no assessment of potential impacts to biological resources, or conflicts with regulatory requirements, that could occur due to

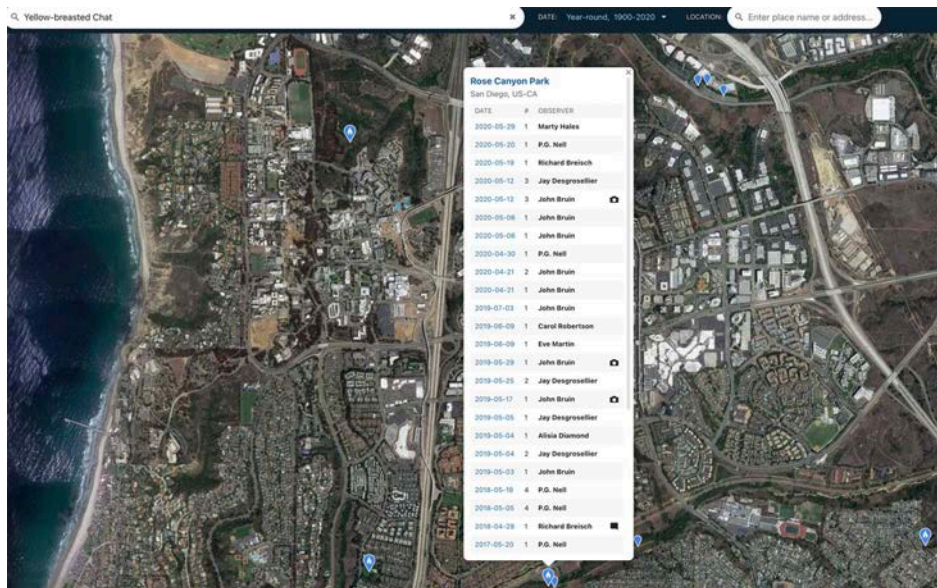


implementation of the UCP, the City would have no basis for referring to this document as supporting any conclusions of the UCP with regard to impact analysis or regulatory compliance.

### Busby Report’s Sensitive Species Information is Incomplete

Much of the Busby Report consists of Table 3, *Sensitive Plant Species with a Potential to Occur within the University Community Plan Update Area*, and Table 4, *Sensitive Wildlife Species with a Potential to Occur in University Community Plan Update Area*. These tables, however, are three years old and fail to incorporate relevant information from public online databases routinely used by field ecologists determining and evaluating the local occurrences of special-status species. Specifically, Busby’s literature review excludes iNaturalist and eBird, both of which document, or at least report, occurrences of special-status species, many of which are never reported to the California Natural Diversity Data Base, Calflora, or other sources referenced in the Busby Report.

The reports in both iNaturalist and eBird are vetted by experts to weed out obviously false reports and to verify evidence that can be confirmed, such as photos showing characteristic field marks. By omitting these important sources of information, the Busby Report provides incomplete and in some cases misleading information on the special-status species known or expected in parts of the UCP planning area. An egregious example is provided by the **Yellow-breasted Chat**, a California Species of Special Concern found in and around riparian areas. Chats have been known to summer in Rose Canyon for more than a decade, yet the species is not mentioned in the Busby Report. The following Exhibit B, a screen-grab from <http://eBird.org>, provides a partial summary of Yellow-breasted Chat records from Rose Canyon Open Space Park that were available at the time the Busby Report was prepared in 2020.



**Exhibit B.** Screen grab from eBird showing a partial list of numerous records of the Yellow-breasted Chat at Rose Canyon Open Space Park from 2017 to 2020, some documented with photographs. The species has also been recorded at several other locations within the UCP planning area.

Page 89 of the Busby Report characterizes the **Least Bell's Vireo**, a species listed as endangered by federal and state governments, as "not expected" as a nesting species in the UCP planning area despite potentially suitable riparian habitat in Rose Canyon and scattered smaller pockets of riparian vegetation elsewhere in the planning area. From May 15 to July 19, 2021, birders P.J. Nell and Jim Roberts repeatedly observed Least Bell's Vireos in Rose Canyon, including an adult feeding a begging juvenile on July 5 (<https://ebird.org/checklist/S91321310>) and July 9 (<https://ebird.org/checklist/S91518140>). Although these observations post-date the 2020 Busby Report, they occurred two years before the UCP was released and would be included in a current and adequate report. This nesting record contradicts the Busby Report's conclusion that nesting by the Least Bell's Vireo is "not expected" within the UCP planning area.

### **No Maps of Special-Status Species or Wildlife Use Areas**

In evaluating the appropriateness of potential trail alignments, biologists and planners normally utilize maps showing the locations where special-status plant and wildlife species have been observed. Also valuable in this regard are maps showing areas used as wildlife denning sites or other forms of refugia for wildlife species that may be sensitive to human disturbance (e.g., nesting raptors, Bobcats). The Busby Report provides no such maps.

### **No Evaluation of Fragmentation, Edge, and Recreation/Trail Effects**

The UCP planning area is mostly developed in the existing condition, with natural open space occurring in fragments constrained by surrounding development (see, for example, Exhibit A on page 5 of this letter). Nevertheless, some of these habitat fragments retain important ecological values, as reflected by their designation as MHPA. If these reserve lands are protected from significant habitat degradation resulting from habitat fragmentation, edge effects, and recreation/trail effects, as required under the MSCP, many sensitive plant and wildlife populations can be expected to persist in these fragments over the long term. Without adequate protection, however, the ecological value of these fragments will degrade over time. Given the importance of addressing these topics across the MHPA, it is surprising and disappointing that the Busby Report contains only four mentions of habitat fragmentation, three of which are in reference to construction policies for roads and utilities passing through MHPA (page 15). The fourth reference, on page 98, is contained in the report's perfunctory and inaccurate discussion of "Wildlife Movement Corridors." Even more surprising is the Busby Report's lack of discussion of edge effects or recreation/trail effects, which are of paramount importance to MSCP planning. The following overview of these concepts, as distilled from the peer-reviewed literature, is offered as a useful contribution to the UCP planning process. The City must take into account these adverse effects before considers proposing any new trails in the MHPA.

#### *Fragmentation and Edge Effects*

Urbanization typically includes residential, commercial, industrial, and road-related development (i.e., the "built" environment). At the perimeter of the built environment is



an area known as the urban/wildland interface, or “development edge.” In ecology, “edges” are places where natural communities interface, vegetation or ecological conditions within natural communities interact (Noss 1983), or patches with differing qualities abut one another (Ries and Sisk 2004). “Edge effects” are spillover effects from the adjacent human-modified matrix that cause physical gradients in light, moisture, noise, etc. (Camargo and Kapos 1995; Murcia 1995, Sisk et al. 1997) and/or changes in biotic factors such as predator communities, density of human-adapted species, and food availability (Soulé et al. 1988; Matlack 1994; Murcia 1995; Ries and Sisk 2004).

Edge effects and habitat fragmentation are among the principal threats to persistence of biological diversity (Soulé 1991). Edge-related impacts may include:

- Introduction/expansion of invasive exotic vegetation carried in from vehicles, people, animals or spread from backyards or fuel modification zones adjacent to wildlands.
- Higher frequency and/or severity of fire as compared to natural fire cycles or intensities.
- Companion animals (pets) that often act as predators of, and/or competitors with, native wildlife.
- Creation and use of undesignated trails that often significantly degrade the reserve ecosystems through such changes as increases in vegetation damage and noise.
- Introduction of or increased use by exotic animals which compete with or prey on native animals.
- Influence on earth systems and ecosystem processes, such as solar radiation, soil richness and erosion, wind damage, hydrologic cycle, and water pollution that can affect the natural environment.

Any of these impacts, individually or in combination, can result in the effective loss or degradation of habitats used for foraging, breeding or resting, with concomitant effects on population demographic rates of sensitive species.

Harrison and Bruna (1999) completed a review of a suite of studies dealing with fragmentation and edge effects and concluded that there is a general pattern of reduction of biological diversity in fragmented habitats compared with more intact ones, particularly with regard to habitat specialists. While physical effects associated with edges were predominant among species impacts, they found evidence for indirect effects including altered ecological interactions. Fletcher et al. (2007) found that distance from edge had a stronger effect on species than did habitat patch size, but they acknowledged the difficulty in separating those effects empirically. Many southern California plant and animal species are known to be sensitive to fragmentation and edge effects; that is, their abundance declines with fragment size and proximity to an edge (Wilcove 1985; Soulé et al. 1992; Bolger et al. 1997a,b; Suarez et al. 1998; Burke and Nol 2000).

Wildlife populations are typically changed in proximity to edges, either by changes in their demographic rates (survival and fecundity), or through behavioral avoidance of or attraction to the edge (Sisk et al. 1997; Ries and Sisk 2004). For example, coastal sage scrub areas within 250 meters of urban edges consistently contain significantly less bare ground and more coarse vegetative litter than do more “intermediate” or “interior” areas, presumably due increased human activity/disturbance of the vegetation structure near edges (Kristan et al. 2003). Increases in vegetative litter often facilitate growth of non-native plants (particularly grasses), resulting in a positive feedback loop likely to enhance plant invasion success (Wolkovich et al. 2009). In another coastal southern California example, the abundance of native bird species sensitive to disturbance is typically depressed within 200 to 500 meters (650 to 1640 feet) of an urban edge, and the abundance of disturbance-tolerant species is elevated up to 1000 meters (3280 feet) from an urban edge, depending on the species (Bolger et al. 1997a).

Habitat fragmentation is usually defined as a landscape scale process involving habitat loss and breaking apart of habitats (Fahrig 2003). Habitat fragmentation is among the most important of all threats to global biodiversity; edge effects (particularly the diverse physical and biotic alterations associated with the artificial boundaries of fragments) are dominant drivers of change in many fragmented landscapes (Laurance and Bierregaard 1997; Laurance et al. 2007).

Fragmentation decreases the connectivity of the landscape while increasing both edge and remnant habitats. Urban and agricultural development often fragments wildland ecosystems and creates sharp edges between the natural and human-altered habitats. Edge effects for many species indirectly reduce available habitat use or utility in surrounding remaining areas; these species experience fine-scale functional habitat losses (e.g., see Bolger et al. 2000; Kristan et al. 2003; Drolet et al. 2016). Losses of coastal sage scrub in southern California have resulted in the increased isolation of the remaining habitat fragments (O’Leary 1990). Fragmentation has a greater relative negative impact on specialist species (e.g., the Coastal Cactus Wren, *Campylorhynchus brunneicapillus*) that have strict vegetation structure and area habitat requirements (Soulé et al. 1992).

Specialist species have an increased risk of extirpation in isolated habitat remnants because the specialized vegetative structures and/or interspecific relationships on which they depend are more vulnerable to disruption in these areas (Vaughan 2010). In studies of the coastal sage scrub and chaparral systems of coastal southern California, fragment area and age (time since isolation) were the most important landscape predictors of the distribution and abundance of native plants (Soulé et al. 1993), scrub-breeding birds (Soulé et al. 1988; Crooks et al. 2001), native rodents (Bolger et al. 1997b), and invertebrates (Suarez et al. 1998; Bolger et al. 2000).

Edge effects that emanate from the human-dominated matrix can increase the extinction probability of isolated populations (Murcia 1995; Woodroffe and Ginsberg 1998). In studies of coastal sage scrub urban fragments, exotic cover and distance to the urban edge were the strongest local predictors of native and exotic carnivore distribution and

abundance (Crooks 2002). These two variables were correlated, with more exotic cover and less native shrub cover closer to the urban edge (Crooks 2002).

The increased presence of human-tolerant “mesopredators” in southern California represents an edge effect of development; they occur within the developed matrix and are thus more abundant along the edges of habitat fragments, and they are effective predators on birds, bird nests, and other vertebrates in coastal sage scrub and chaparral systems and elsewhere (Crooks and Soulé 1999). The mammalian carnivores more typically detected in coastal southern California habitat fragments are resource generalists that likely benefit from the supplemental food resources (e.g., garden fruits and vegetables, garbage, direct feeding by humans) associated with residential developments. As a result, the overall mesopredator abundance, of such species as raccoons (*Procyon lotor*), opossums (*Didelphis virginiana*), and domestic cats (*Felis catus*), increases at sites with more exotic plant cover and closer to the urban edge (Crooks 2002). Although some carnivores within coastal sage scrub fragments seem tolerant of disturbance, many fragments have (either actually or effectively) already lost an entire suite of predator species, including mountain lion, bobcats (*Lynx rufus*), spotted skunks (*Spilogale gracilis*), long-tailed weasels (*Mustela frenata*), and badgers (*Taxidea taxus*) (Crooks 2002). Most “interior” sites within such fragments are still relatively near (within 250 meters of) urban edges (Crooks 2002).

Fragmentation generally increases the amount of edge per unit land area, and species that are adversely affected by edges can experience reduced effective area of suitable habitat (Temple and Cary 1988), which can lead to increased probability of extirpation/extinction in fragmented landscapes (Woodroffe and Ginsberg 1998). For example, diversity of native bees (Hung et al. 2015) and native rodents (Bolger et al. 1997b) is lower, and decomposition and nutrient cycling are significantly reduced (Treseder and McGuire 2009), within fragmented coastal sage scrub ecosystems as compared to larger core reserves. Similarly, habitat fragmentation and alterations of sage scrub habitats likely have reduced both the genetic connectivity and diversity of coastal-slope populations of the Cactus Wren in southern California (Barr et al. 2015). Both Bell’s Sparrows (*Artemisiospiza belli*) and California Thrashers (*Toxostoma redivivum*) show strong evidence of direct, negative behavioral responses to edges in coastal sage scrub; that is, they are edge-averse (Kristan et al. 2003), and California Thrashers and California Quail (*Callipepla californica*) were found to be more vulnerable to extirpation with smaller fragment size of the habitat patch (Bolger et al. 1991), demonstrating that both behavioral and demographic parameters can be involved. Other species in coastal sage scrub ecosystems, particularly the Cactus Wren and likely the California Gnatcatcher and San Diego Pocket Mouse (*Chaetodipus fallax*), are likely vulnerable to fragmentation, but for these species the mechanism is likely to be associated only with extirpation vulnerability from habitat degradation and isolation rather than aversion to the habitat edge (Kristan et al. 2003). Bolger (et al. 1997b) found that San Diego coastal sage scrub and chaparral canyon fragments under 60 acres that had been isolated for at least 30 years support very few populations of native rodents, and they suggested that fragments larger than 200 acres in size are needed to sustain native rodent species populations.

The penetration of exotic species into natural areas can reduce the effective size of a reserve in proportion to the distance they penetrate within the reserve: Argentine Ants serve as an in-depth example of edge effects and fragmentation. Spatial patterns of Argentine Ant abundance in scrub communities of southern California indicate that they are likely invading native habitats from adjacent developed areas, as most areas sampled greater than 200 to 250 meters from an urban edge contained relatively few or no Argentine Ants (Bolger 2007, Mitrovich et al. 2010). The extent of Argentine Ant invasions in natural environments is determined in part by inputs of urban and agricultural water run off (Holway and Suarez 2006).

Native ant species were more abundant away from edges and in areas with predominantly native vegetation. Post-fragmentation edge effects likely reduce the ability of fragments to retain native ant species; fragments had fewer native ant species than similar-sized plots within large unfragmented areas, and fragments with Argentine Ant-free refugia had more native ant species than those without refugia (Suarez et al. 1998). They displace nearly all surface-foraging native ant species (Holway and Suarez 2006) and strongly affect all native ant communities within about 150 to 200 meters from fragment edges (Suarez et al. 1998; Holway 2005; Fisher et al. 2002; Bolger 2007; Mitrovich et al. 2010). Argentine Ants are widespread in fragmented coastal scrub habitats in southern California, and much of the remaining potential habitat for Blainville's Horned Lizards (*Phrynosoma blainvillii*) is effectively unsuitable due to the penetration of Argentine Ants and the subsequent displacement of the native ant species that horned lizards need as prey (Fisher et al. 2002). Invasion of Argentine Ants into coastal sage scrub has also shown a strong negative effect on the abundance of the Gray Shrew (*Notiosorex crawfordi*) (Laakkonen et al. 2001).

### *Recreation and Trail Effects*

In the introduction to their study on the efficacy and perception of trail use enforcement at the 866-acre Del Mar Mesa Preserve in the City of San Diego, Greer et al. (2017:56-57) briefly summarized adverse effects of recreation upon ecological functions and values:

The field of Recreation Ecology studies the impacts of recreation users on various biotic and abiotic elements of the landscape. Studies have shown that various types of passive outdoor recreation can result in displacement and reduction of wildlife, the trampling of native habitat and species, impacts to soil and water resources [although] users may not be aware of their impacts or legality of their actions. This balance between recreational use and natural resource conservation has become a key element of land management around the world. [citations omitted]

Greer et al. (2017) evaluated different approaches to resolving problems associated with creation, use, and maintenance of unpermitted trails at the Del Mar Mesa Preserve, activities that had fragmented and degraded the Preserve's natural communities for at least a decade at that time. They concluded, in part:

This Study showed that soft enforcement aimed at public education and redirecting social norms was not sufficient in curbing illegal trail use in an urban natural area. The movement towards citations and the threat of citations was effective at redirecting behavior by making

non-compliance more risky. This in turn had an unintended consequence of promoting hostility amongst a large user base.

The long-standing resource management problems associated with illegal trails at the Del Mar Mesa Preserve persist, with no clear resolution in sight (e.g., Karen Billing, San Diego Union Tribune, July 6, 2022: *Del Mar Mesa Preserve Tunnel Trail Vandalized* <https://www.sandiegouniontribune.com/local/story/2022-07-06/del-mar-mesa-preserve-trail-vandalized>).

## EVALUATION OF TWO PROPOSED NEW TRAILS IN UCP

All trails, including those that are carefully sited and well-designed, necessarily contribute to habitat fragmentation, edge effects, and recreation impacts. To minimize these insidious forms of habitat degradation, Section 1.5.2 of the Subarea Plan identifies several Priority 1 Directives for Public Access, Trails, and Recreation. As discussed previously in this letter, the most important of these for the UCP project is No. 2:

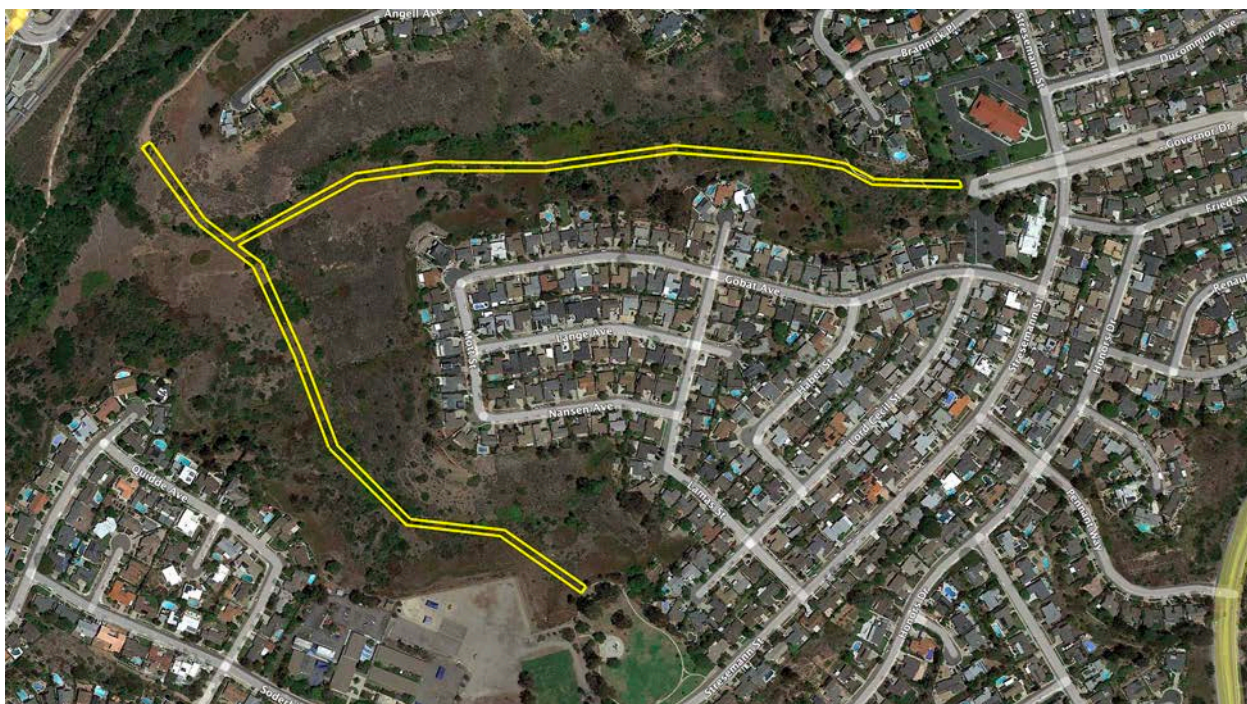
Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary because of the typically heightened resource sensitivity in those locations.

I have not yet visited the specific areas that would be impacted by proposed new trails, but examination of aerial imagery and Figure 7-2 in the Busby Report (Sensitive Vegetation Communities) demonstrate to me that construction of at least two of the proposed new trails – from Governor Drive and from Stresemann Street to the bottom of Rose Canyon – would be grossly inconsistent with the MSCP's conservation goals. These two trails would be built through sensitive wetlands, native grasslands, and coastal sage scrub in two major side-canyons to Rose Canyon that lack substantial trails in the existing condition (see Exhibit C on the next page). According to Debby Knight (in litt.):

The canyons there are incredibly steep and are crisscrossed by huge, deep erosion gullies caused by storm drain pipes that empty out from the streets along the edges of development. This causes wide erosion gullies that are 8-10' deep and simply uncrossable. These crisscrossing the whole area. Topo maps should show how steep the terrain is in areas. A few of us tried to walk these two trails several years ago. We tried to walk from the west end of Governor down, and found it nearly impossible to walk due to how steep the slope is, and the fact that we had to repeatedly climb down into deep erosion gullies and back up again. We made it only a small distance of the way in over an hour. We tried to walk from the bottom up of the proposed trail alignment from Stresemann St., and that was also literally impossible to walk - a giant erosion gully about 8' deep and 10' across, and then slopes so steep we could barely keep our footing. We stopped less than half way up.

Because of their prohibitive topography, the sensitive natural communities, and lack of substantial trails, these two side-canyons to Rose Canyon currently provide habitat for those wildlife species that are most sensitive to habitat fragmentation, human presence (hiking, cycling), and presence of dogs. Constructing new trails through these important areas of refuge would be completely antithetical to MSCP conservation goals.





**Exhibit C.** Showing the conceptual, or schematic, alignments for approximately one mile of new trails that the UCP proposes to connect from Governor Drive (northern trail) and Stresemann Street (southern trail) to the southern end of the existing Rose Canyon Trail. Contrary to MSCP planning principles, these trails would be built through steep terrain vegetated with sensitive plant communities (wetlands, native grassland, coastal sage scrub) in canyons that currently lack substantial trails. Such areas are especially valuable for wildlife that is sensitive to habitat fragmentation, human presence (hiking, cycling), and interactions with dogs.

## **ALL PROPOSED TRAILS MUST BE EVALUATED FOR MSCP CONSISTENCY**

The two trails discussed previously and shown in Exhibit C present the most obvious conflicts with the MSCP and the MHPA. Given the hard line reserve status of the urban reserve lands in the MHPA, it is unlikely that any new trails, apart from trails proposed entirely on existing dirt roads, could be legitimately determined to be consistent with MSCP requirements. The City must conduct a thorough and credible evaluation for MSCP consistency before proposing any new trails in the MHPA.

## **CONCLUSION**

As discussed herein, the City's exclusion of the relevant MSCP Management Policies and Directives from the UCP violates the Parks Master Plan, undermines the UCP's credibility as a planning document, and puts the City's MSCP Take Authorization at risk of revocation by the resource agencies. Furthermore, by prematurely proposing new trails in the absence of a current biological technical report that credibly demonstrates the UCP's consistency with the MSCP and Subarea Plan, the City is improperly raising expectations among the public that these trails can and will be built. The predictable result is unwarranted conflict between environmental and recreational user groups. For these important reasons, the City should withdraw all proposed trails through the MHPA until a credible analysis of MSCP consistency can be completed.

If any recipient has questions, please send e-mail to [robb@hamiltonbiological.com](mailto:robb@hamiltonbiological.com) or call me at (562) 477-2181.

Sincerely,



Robert A. Hamilton  
President, Hamilton Biological, Inc.

cc: David Zoutendyk, USFWS  
Jonathan Snyder, USFWS  
Scott Sobiech, USFWS  
David Mayer, CDFW  
Susan Wynn, CDFW  
Karen Drewe, CDFW  
Dan Silver, Endangered Habitats League

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# **Attachment 5**





## HAMILTON BIOLOGICAL

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July 3, 2023

Blueprint SD Project Manager  
City of San Diego Planning Department  
9485 Aero Drive, M.S. 413  
San Diego, CA 92123  
E-Mail: [blueprints@sandiego.gov](mailto:blueprints@sandiego.gov)

### **SUBJECT: COMMENTS ON BIOLOGICAL RESOURCE ISSUES BLUEPRINT SD, DISCUSSION DRAFT**

Dear Blueprint SD Project Manager,

The Friends of Rose Canyon is a community organization concerned with the protection of sensitive natural resources in Rose Canyon Open Space Park, and other sensitive habitat areas in the City of San Diego, consistent with existing regulations. At the request of the Friends of Rose Canyon, Hamilton Biological has reviewed the Blueprint SD proposed amendments to the City of San Diego's General Plan and provides these comments on items relevant to the San Diego Multiple Species Conservation Program (MSCP) and other biological resource issues.

### **CONSERVATION ELEMENT**

#### **Tree Planting, Urban Forestry**

Proposed language that may be improved:

CE-A.12. Identifying City lands and spaces that need trees and identify ways to increase permeable areas for new trees. Prioritize implementation in areas with the greatest needs.

CE-A.13. Plant trees (consistent with habitat and water conservation policies) for their many environmental benefits, including natural carbon sequestration.

CE-J.1.1. Identifying City lands and spaces that need trees and identify ways to increase permeable areas for new trees. Prioritize implementation in areas with the greatest needs.

Existing policies that may be strengthened:

CE-B.1.e. Encourage the removal of invasive plant species and the planting of native plants near open space preserves.

CE-G.1.e. Remove, avoid, or discourage the planting of invasive plant species.

The City of San Diego Multi-Habitat Planning Area (MHPA) delineates core biological resource areas and corridors targeted for conservation. Many rare and declining plant and wildlife species dependent upon maritime succulent scrub and coastal sage scrub vegetation communities – most notably the California Gnatcatcher and Cactus Wren – are deemed to be “covered” under the MSCP based upon determinations that their populations are being effectively conserved within the MHPA.

Scrub-dependent species require open, low-growing habitats such as maritime succulent scrub and coastal sage scrub. Planting tall trees adjacent to scrub habitat can reduce habitat suitability for gnatcatchers, wrens, and other scrub-dependent wildlife, through shading or displacement of scrub, reductions in line-of-sight that may be important to some species, or by creating arboreal nesting habitat for the Cooper’s Hawk, an increasingly common raptor across the region that preys mainly on small birds.

Carefully considered plantings of appropriate native tree species in degraded areas, even within MHPA, can be an effective conservation and management tool. The indiscriminate addition of trees to a natural landscape, however, can be detrimental to existing sensitive resources. Therefore, any proposed plantings of trees within or adjacent to MHPA should be carefully evaluated conducted according to a Natural Resource Management Plan (per policy CE-B.1.h) subject to review and comment by the US Fish and Wildlife Service, California Department of Fish and Game, and members of the public.

Existing General Plan policies CE-B.1.e, which encourages “removal of invasive plant species and the planting of native plants near open space preserves,” and CE-G.1.e which “discourage[s] the planting of invasive plant species,” should both be updated and strengthened to **prohibit all plantings of invasive species**. Even when planted away from preserved lands, the seeds of invasive trees and other landscape plants are carried by birds and the storm drain system into local canyons, resulting in harmful establishment of many exotic plants in the MHPA.

In general, the City’s tree planting policies should more strongly encourage the use of locally native species that are adapted to the San Diego area, and that provide valuable habitat for native pollinators and other forms of wildlife. Plantings of appropriate native species, which require minimal or no irrigation once established, should be encouraged over non-native ones that require more extensive irrigation and that will be increasingly vulnerable to drought-stress as the climate warms.

Please refer to comments submitted to the City in a letter dated June 29, 2023, from the San Diego Chapter of the California Native Plant Society (CNPS) regarding the proposed University Community Plan Update. The letter, prepared by chapter President Justin Thomas Daniel, contains numerous useful and valid suggestions for using drought-tolerant native tree species in landscaping.

## CE-B.1: Recreation in Urban Canyons

Proposed language (bold represents City-proposed additions):

CE-B.1.c. Protect, **restore and enhance** urban canyons and other important community open spaces including those that have been designated in community plans for the many benefits they offer locally, and regionally, **including environmental education and recreation opportunities**, as part of a collective citywide open space system (see also Recreation Element, Sections C and F; Urban Design Element, Section A).

This call for increased “recreation opportunities” in urban canyons echoes proposals for new trails in the City’s University Community Plan Update (UCPU). Some of the trails proposed in the UCPU would pass through areas of sensitive habitat in the MHPA, which is strictly prohibited under the City’s existing MSCP habitat conservation commitments.

The City’s MSCP conservation commitments cannot be subordinated to other land-use priorities without jeopardizing the legitimacy of the MSCP itself. To avoid sending a mixed message about the City’s commitment to the MSCP and Subarea Plan, Blueprint SD should avoid adding any open-ended language to the General Plan that leaves those commitments open to question. See also the comments of Shute, Mihaly & Weinberger regarding suggested wording of General Plan policies to clarify the primacy of conservation over recreation in the MHPA.

### CE-B.1.h: Preparation of Natural Resource Management Plans

The City proposes to add the following language to this policy:

CE-B.1.h. Prepare and update Natural Resource Management Plans on all managed preserved lands and include in plans considering shifting habitat or conditions due to climate change as well as sequestration potential, as the information becomes available.

The preparation of Natural Resource Management Plans for all managed preserved lands, as called for in the Subarea Plan, is a welcome development. The reference to “sequestration potential” in the proposed echoes language proposed in CE-A.13, a policy that encourages planting large numbers of trees. As discussed previously in these comments, the *indiscriminate* planting of trees, especially within or adjacent to MHPA, does not represent sound conservation policy.

Also relevant, a 2018 study<sup>1</sup> by researchers at UC Davis found:

In contrast to the conventional paradigm, we show that the inherent resilience of grassland vegetation to drought and wildfire translates to a more reliable carbon sink than forest ecosystems in response to 21st century climate changes.

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<sup>1</sup> Dass, P., Houlton, B. Z., Wang, Y., and Warlind, D. 2018. Grasslands may be more reliable carbon sinks than forests in California. *Environmental Research Letters* 13 074027. <https://iopscience.iop.org/article/10.1088/1748-9326/aacb39>

The UC Davis study identified grasslands as “the only viable net CO<sub>2</sub> sink” through the year 2101 because native grasses “have evolved to thrive in semi-arid climates, developing physiological adaptations to overcome the challenges of drought-stress and protecting most of its carbon storage from fires by allocating it belowground.” That is, native grasses sequester large volumes of carbon in their extensive root systems, which are not susceptible to fire. On the other hand, trees are vulnerable to drought-stress, and they release their stored carbon into the atmosphere during fires. This may make trees less valuable than native grasses for carbon sequestration in semi-arid climates like San Diego.

To reiterate a previous comment, carefully considered plantings of appropriate native tree species in degraded areas, even within MHPA, can be an effective conservation and management tool. The *indiscriminate* addition of trees to a natural landscape, however, can be detrimental to existing sensitive resources.

Also, plantings of appropriate native species, which require minimal or no irrigation once established, should be encouraged over non-native ones that require extensive irrigation and that will be increasingly vulnerable to drought-stress as the climate warms.

Until the intended meaning of the term “sequestration potential” is defined, and its inclusion in the policy can be scientifically justified, it may be preferable to remove this term from the language of CE-B.1.h.

## **CE-E.2: Water Quality Protection Measures**

Several of the existing and proposed policies in this section call for use of vegetation to achieve water quality objectives. In general, these policies should encourage the use of locally native plant species that are adapted to the local environment and that provide valuable habitat for native pollinators and other forms of wildlife.

## **Biological Diversity Discussion**

Pages CE-46 and CE-47 state, “the MSCP has streamlined existing permit procedures for development projects while preserving critical habitat.”

The term “critical habitat” is specifically defined under the federal Endangered Species Act: <https://www.fws.gov/sites/default/files/documents/critical-habitat-fact-sheet.pdf>

Because the MSCP conservation lands includes many areas not officially designated as “critical habitat” by the federal government, this term should not be used in the General Plan to refer to the MSCP conservation lands as a whole.

## **Urban Forestry**

As discussed previously, the City’s tree planting policies should more strongly encourage the use of locally native species that are adapted to the local environment and that provide valuable habitat for native pollinators and other forms of wildlife. The planting of non-native, invasive species should be strictly prohibited.

Consider, for example, that the City's currently-proposed University Community Plan Update Discussion Draft calls for plantings of four tree species known to be invasive in San Diego County<sup>2</sup>: Evergreen Ash (*Fraxinus uhdei*), Chinese Elm (*Ulmus parvifolia*), Red River Gum (*Eucalyptus camadulensis*), and Mexican Fan Palm (*Washingtonia robusta*).

The City's Plan also calls for extensive plantings of the exotic Canary Island Palm (*Pinus canariensis*) to "create a sense of place" while ignoring the visually similar Torrey Pine (*Pinus torreyana* ssp. *torreyana*), which is famously endemic to the La Jolla area.

Please refer to the previously referenced comments from the local CNPS chapter, which contains numerous useful and valid suggestions for using drought-tolerant *native* tree species in landscaping.

## **MOBILITY ELEMENT**

Please see the comments of Shute, Mihaly & Weinberger, which recommend that the Mobility Element include an introductory paragraph to clarify that all references to trails are done so with the assumption and understanding that any new trails would be identified through the Trails Master Plan process. Furthermore, new proposed trails would need to be studied to ensure they meet the general Management Directives that support the MSCP's Conservation Objectives to adequately protect MSCP-covered species within the MHPA.

All improvements in connectivity and mobility must be made in conformance with MCSP and MHPA goals, guidelines, and directives.

## **PUBLIC FACILITIES, SERVICES AND SAFETY ELEMENT**

Policy PF-M.4 contains subheadings a through g, but these do not line up with the policies. This should be corrected. For these comments, I have referred to the first four paragraphs of this policy.

The first paragraph of PF-M.4 states:

Cooperatively plan for and design new or expanded public utilities and associated facilities (e.g., telecommunications infrastructure, planned energy generation facilities, gas compressor stations, gas transmission lines, electrical substations and other large scale gas and electrical facilities) to maximize environmental and community benefits.

This paragraph should clarify that these public facilities must be consistent with all relevant MSCP goals, guidelines, and directives.

The second paragraph of PF-M.4 states:

Use transmission corridors to enhance and complement wildlife movement areas and preserved open space habitat as identified in the City's Multiple Species Conservation Program (MSCP).

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<sup>2</sup> <https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/Landscape/WELDManual-Appendix-I.pdf>



This policy appropriately recognizes the requirement to adhere to MSCP goals, guidelines, and directives.

The third paragraph of PF-M.4 states:

Provide adequate buffering and maintained landscaping between utility facilities and residential and non-residential uses, including the use of non-building areas and/or rear setbacks.

Maximize land use and community benefit by locating compatible/appropriate uses within utility easements/right-of-ways (e.g., passive parkland, natural open space, wildlife movement, urban gardens, plant nurseries, parking, access roads, and trails). Trails can be allowed in these easement/right-of-ways, provided proper indemnification, funding and maintenance is set forth in a written agreement between the public utility, the City, and project developer.

The latter paragraph should state that the efforts to “maximize land use and community benefit” and to utilize public easements or rights of way for trails and other uses must recognize the overarching requirement to adhere to all applicable MSCP goals, guidelines, and directives.

## CONCLUSION

Blueprint SD outlines some new and innovative directions for San Diego’s future. As addressed in these comments, and those of Shute, Mihaly & Weinberger, City planners, engineers, and political leaders implementing land-use policies must remain cognizant of the long-standing and binding commitments that the City has made to the MSCP planning process, and to managing MHPA lands according to the goals, guidelines, and directives provided in the MSCP Subarea Plan.

Sincerely,



Robert A. Hamilton  
President, Hamilton Biological, Inc.

cc: Dan Silver, Endangered Habitats League

**O4: Friends of Rose Canyon, Shute Mihaly & Weinberger LLP on behalf of**

**O4-1:** The introductory comment is noted.

**O4-2:** Comment noted. The proposed trails, showing specific alignments, have been removed from the University Community Plan Update (CPU), the project description in Section 3.5.3(e) of the Final Program Environmental Impact Report (PEIR), from Figure 3-26 of the Final PEIR, and from the impact analysis in Section 4.3.4, Issue 4, of the Final PEIR.

**O4-3:** Comment noted. The comment suggesting recirculation of the Draft PEIR has been noted. The Draft PEIR has not been revised to the extent that new information would require recirculation. The Final PEIR includes modifications to the Draft PEIR, but these modifications clarify the discussions and/or material presented in the Draft PEIR. Recirculation of the Draft PEIR is not required.

**O4-4:** The comment cites various regulatory requirements and requirements of the City's Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) but does not raise a specific issue with the adequacy of the analysis in the Draft PEIR.

**O4-5:** Citations regarding the City's MSCP SAP and management of the City's Multi-Habitat Planning Area (MHPA) are noted.

**O4-6:** Comment noted. The comments address management of the MHPA and do not raise an issue regarding adequacy of the analysis in the Draft PEIR.

**O4-7:** Comment noted. See response to comment O4-2.

**O4-8:** The comment states that the Draft PEIR fails to provide information regarding the presence and location of sensitive biological species within MHPA lands. The presence and location of sensitive biological species is presented in Section 4.3.1 of the PEIR and within the Biological Resources Report prepared for the University CPU (see Appendix D of the PEIR). In addition, the MSCP Core Biological Resource Area Corridor in Figure 3-27 in the Final PEIR has been revised to run north/south along the east side of I-805.

**O4-9:** Comment noted. See response to comment O4-3.

**O4-10:** See response to comment O4-2.

**O4-11:** The comment describes the City's CEQA Significance Determination Thresholds for biological resources and cites regulatory requirements from the CEQA Guidelines. The comment is noted, and no further response is required.

**O4-12:** See response to comment O4-2.

**O4-13:** The comment reiterates that the Draft PEIR does not analyze the potential impacts associated with proposed trails in the MHPA lands. See response to comment O4-2.

**O4-14:** The comment reiterates that the Draft PEIR does not analyze the potential impacts associated with the proposed trails in the MHPA lands. See response to comment O4-2. See Section

4.13 of the PEIR for a discussion of potential impacts to recreational facilities associated with the project.

**O4-15:** The comment states that the potential impacts to MHPA lands resulting from potential increased development adjacent to MHPA lands was insufficiently analyzed. The Draft PEIR addresses the biological impacts of the Blueprint SD Initiative, the Hillcrest Focused Plan Amendment (FPA), and the University CPU in Section 4.3, Biological Resources. While most of the biological resources assessed, including but not limited to, sensitive species, sensitive vegetation communities, wetlands, wildlife corridors and nursery sites, and the resources protected in conservation plans, are present within areas that are designated as Open Space, Environmentally Sensitive Land (ESL), or within the MHPA, and would be preserved from future development, there are some areas where planned land uses could potentially result in direct or indirect impacts to these resources. Such impacts could occur directly through removal or indirectly by placing development adjacent to sensitive vegetation communities. Future site-specific development under the project would be required to comply with the ESL Regulations, Biology Guidelines, MSCP SAP and Vernal Pool Habitat Conservation Plan (VPHCP). However, since the Draft PEIR provides a program-level review of the project, and site-specific plans are not available for review, it cannot be ensured that all impacts to biological resources would be mitigated to a less than significant level. Thus, impacts would be significant at a program level of review. Mitigation measure MM-BIO-1 in Section 4.3.6 of the Draft PEIR reinforces this compliance, and future discretionary development proposals would be required to evaluate potential impacts and identify feasible mitigation measures as detailed in MM-BIO-1 and as otherwise required in the City's Environmentally Sensitive Lands Regulations.

Regarding the proposed trails, see response to comment O4-2.

**O4-16:** As mentioned by the commenter, future land use plan updates and San Diego Municipal Code (SDMC) amendments which help facilitate the implementation of the Blueprint SD Initiative would be reviewed for consistency with the analysis in the PEIR and, depending on the scope of future projects, future environmental review for consistent projects might include tiered Mitigated Negative Declarations (MNDs), tiered EIRs, or other tiered environmental analysis in accordance with CEQA Guidelines Sections 15152, 15153, 15162, 15163, 15164, 15168, and/or 15183. This condition does not preclude the environmental analysis of future projects from happening. As such, the City has assessed the potential biological resource impacts of the proposed project to the extent feasible and included mitigation that would reduce or avoid future biological resource impacts from future development that could occur as a result of the proposed project. Regarding the trails, see response to comment O4-2.

**O4-17:** The project's consistency with the MSCP SAP and VPHCP are assessed in Section 4.10.4, Issue 2 (f) and (g), of the Draft PEIR. As described in this section, implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be consistent with the City's MSCP SAP and VPHCP at a program level of review as development is planned in primarily urbanized locations and within areas not planned for conservation. Additionally, the project does not propose policies which would conflict with the MSCP SAP. While most future development consistent with the Blueprint SD Initiative, University CPU, and Hillcrest FPA would take place in urbanized areas, the City is taking a conservative approach in indicating there is the potential for it to occur within lands designated as

MHPA or located adjacent to these lands. The MSCP SAP establishes MHPA Land Use Adjacency Guidelines and the VPHCP includes avoidance and minimization measures which would be applied and addressed on a project-by-project basis to minimize direct and indirect impacts and maintain the function of the MHPA. All future development would be required to demonstrate consistency with the MSCP SAP and VPHCP at the project level.

In the University CPU area, an MHPA boundary line correction (BLC) is proposed to add lands to the MHPA. This action was presented and coordinated with the Wildlife Agencies on January 19, 2024.

Regarding the preparation of Natural Resource Management Plans (NRMPs), see response to comment O11-41 under comment letter O11. Regarding the proposed trails, see response to comment O4-2.

**O4-18:** CEQA Guidelines Section 15126.4(a)(1)(B) allows compliance with the City's regulations to be identified as mitigation if compliance results in implementation of measures that would be reasonably expected to reduce the significant impact. The City's regulations provide a standardized process for addressing development impacts across the City and they lay out a process for which impacts can be addressed at a more project-specific level. Because all development projects are subject the City's Land Development Code regulations (e.g., its ESL Regulations), many of which are put in place for the specific purpose of mitigating or reducing environmental impacts through specific performance standards, these regulations are referenced as required mitigation measures. See also response to comment O4-17.

**O4-19:** Comment noted. The funding of the MSCP SAP and VPHCP are not within the scope of the Draft PEIR. See also response to comment O11-43 under comment letter O11. Regarding the proposed trails, see response to comment O4-2.

**O4-20:** As described under response to comments O4-17 and O4-18, the proposed mitigation measure would reinforce the detailed performance standards of the City's ESL Regulations, Biology Guidelines, and the MSCP SAP and VPHCP. As described in Sections 4.3.6 and 4.3.7 of the Draft PEIR, mitigation measures are provided at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific projects are proposed. The mitigation measures refer to City regulations and plans that have incorporated detailed performance standards and are fully enforceable through permit conditions or other legally binding instruments, consistent with CEQA Guidelines Section 15126.4(a)(2). The referenced plans, policies, and regulations in the mitigation measure provide a program-level framework for reducing significant impacts related to biological resources. MM-BIO-1 would be implemented to minimize and avoid impacts related to sensitive species, sensitive habitats, and wetlands to the extent feasible.

The City is taking a conservative approach in determining the potential for significant future biological resource impacts to occur. At a program level of review and without project-specific details, it cannot be known with certainty that it would be feasible to mitigate all significant impacts to less than significant levels due to the potential for deviations from the City's ESL Regulations to be approved. These deviations could allow for limited instances of impacts to occur that are not fully mitigated. Therefore, as described in Section 4.3.7 of the Final PEIR, impacts would remain significant after the implementation of MM-BIO-1.

Regarding the proposed trails, see response to comment O4-2.

**O4-21:** See response to comment O4-2.

**O4-22:** Comment noted. This comment is generally concerned with analysis of the alternatives, but does not provide a specific concern. No response is necessary.

**O4-23:** A reasonable range of alternatives is considered in the Final PEIR. The City carefully considered a range of alternatives that would have the potential to lessen the environmental impacts of the project. Due to the programmatic nature of the impact evaluation, the City was not able to identify an alternative that would completely avoid the significant impacts of the project. In all scenarios, project impacts would occur as a result of growth that is anticipated in the region. Future growth in the region would result in potentially significant impacts under the project and all alternatives related to aesthetics, air quality, biological resources, cultural resources, hydrology, noise, public services, recreation, transportation (VMT), tribal cultural resources, utilities and service systems, and wildfire. As a result, the intent of the project was to identify a land use plan that would minimize these impacts to the greatest extent possible. Therefore, the project alternatives considered variations in how growth would occur throughout the City including a higher density alternative, an alternative that considered growth occurring in a more distributed way, and a reduced density alternative. Each of these alternatives would incrementally affect the significance of impacts of the project, but none would altogether eliminate a significant impact of the project. As no significant impact could be completely avoided, the City evaluated each alternative in terms of which impacts would be incrementally reduced and the degree that the alternative would meet the project objectives. Both the High Density Alternative and Reduced Density Alternative were identified as the environmentally superior alternatives. While the High Density Alternative and Reduced Density Alternative would not eliminate any significant impacts of the project, they would reduce the significance of impacts in comparison to the project. For the High Density Alternative, the significance of impacts would be reduced for the issues of energy, GHG emissions, and transportation. For the Reduced Density Alternative, the significance of impacts would be reduced for the issues of aesthetics, air quality, and noise. The Final PEIR was revised in Section 8.5 to clarify the reason for selecting the environmentally superior alternatives.

In addition, revisions to the Final PEIR were incorporated to clarify the scope of two of the project alternatives, the Reduced Density Alternative and the High Density Alternative. The Draft PEIR "Blueprint SD Initiative Reduced Density Alternative" was renamed in the Final PEIR to the "Reduced Density Alternative". The description of this alternative was revised and clarified in Section 8.4.1 to identify the specific density reductions within the University CPU and Hillcrest FPA. At the request of the University Community Planning Group, the City incorporated an analysis of the University Community Planning Group's Community Preferred Alternative. The Draft PEIR's University CPU and Hillcrest FPA High Density Alternative was revised in Final PEIR Section 8.2.1 to the "High Density Alternative" and the description of this alternative was revised to clarify that throughout the Climate Smart Village Areas, increases in residential and non-residential development intensities would be achieved through corresponding changes to the base zone development regulations contained in the Municipal Code such as allowing for additional height and FAR within the Climate Smart Village Areas. This alternative was analyzed at the request of multiple climate action, housing, bicycle, and public transportation advocacy groups.



**04-24:** See response to comment O4-23.

**04-25:** See response to comment O4-23.

**04-26:** See response to comment O4-23 and response to comment O13-5 under comment letter O13.

**04-27:** The commenter is correct that the No Project Alternative would avoid the placement of trails in the MHPA. However, as mentioned in response to comment O4-2, the proposed trails are no longer a part of this project.

As described in Section 8.2.2 (c), development under the High Density Alternative would be required to comply with the City's ESL Regulations, Biology Guidelines, and the provisions of the MSCP SAP and VPHCP which would reduce potential impacts to sensitive biological resources. Additionally, the City is regional partner in the MSCP and coordinates closely with the San Diego Association of Governments (SANDAG), the San Diego Management and Monitoring Program (SDMMP), various environmental group stakeholders, and the Wildlife Agencies to ensure implementation of the MSCP at a regional scale and any future impacts resulting from increased build out would continue to be monitored through existing regional coordination efforts. Nevertheless, a conservative analysis of biological impacts assumes that even with implementation of existing regulatory protections for biological resources, impacts to sensitive species and habitats and wetlands resulting from future development within the project areas would be significant.

**04-28:** See response to comment O4-3.

**04-29:** The attachments do not contain comments on the Draft PEIR. They are noted; no additional response is required. Attachment 3 is a letter with comments on the Draft PEIR. The responses to these comments are recorded below.

**04-30:** The comment is an introduction to the letter. No response is necessary.

**04-31:** The comment describes the origin and purpose of the MSCP and the MHPA. It does not include comments on the adequacy of the Draft PEIR; no response is necessary.

**04-32:** The comment refers to the previously proposed trails, which are no longer a part of the proposed project. See response to comment O4-2.

**04-33:** See response to comment O4-2 above. The comments on the existing informal trail conditions and the site conditions depicted in the exhibit and photos are noted.

**04-34:** See response to comment O4-2. The PEIR discusses biological impacts to sensitive species, such as the California gnatcatcher and Nuttall's scrub oak, in Section 4.3.4, Issue 1, of the PEIR and in the Biological Resources Report prepared for the University CPU (see Appendix D of the PEIR).

**04-35:** See response to comment O4-20.

**O4-36:** As described in response to comment O4-2, the proposed trails are no longer a part of the project. Regarding the proposed project's consistency with the City's MSCP, see response to comment O4-17.

**O4-37:** The proposed trails have been removed from the University CPU. See response to comment O4-2 above. Future projects that could directly and/or indirectly impact sensitive species, sensitive habitats, and/or wetlands are required to comply with the City's ESL Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans, including but not limited to, the City's MSCP SAP and VPHCP. Future projects shall also implement avoidance, minimization, and mitigation measures in accordance with the City's ESL Regulations, Biology Guidelines, and MSCP SAP and VPHCP.

**O4-38:** See response to comment O11-41 under comment letter O11 for a discussion of the process being undertaken for the development of the City's NRMPs.

**O4-39:** The previously proposed trails have been removed from this project. See response to comment O4-2.

**O4-40:** See response to comment O11-41 under comment letter O11 for a discussion of the process being undertaken for the development of the City's NRMPs. As described in O4-2, the previously proposed trails are no longer a part of the project.

**O4-41:** See response to comment O4-2.

**O4-42:** The comments on existing topography and trail conditions are noted. As mentioned in response to comment O4-2, the proposed trails have been removed from the proposed project.

**O4-43:** The concerns about the location of Nuttall's scrub oak are noted. As described in response to comment O4-2, the project no longer proposes trails in as part of the University CPU. All future development would be required to demonstrate consistency with the MSCP SAP and VPHCP at the project level. See also response to comment O4-17.

**O4-44:** The analysis in the Draft PEIR is intended to be program-level. Data provided is sufficient to characterize the typical species and vegetation communities and land cover types present in the University CPU area. All ministerial and discretionary projects must comply with the City's MSCP SAP, VPHCP, ESL Regulations and Biology Guidelines. As future development is proposed on land adjacent to or containing ESL and/or MHPA, the City would require a site-specific biological analysis to be prepared in accordance with the City's Biology Guidelines in order to verify existing conditions, vegetation communities, and species present. Additionally, mitigation measure MM-BIO-1, in section 4.3.6 of the PEIR, reinforces this compliance. Nevertheless, a conservative analysis of biological impacts assumes that even with implementation of existing regulatory protections for biological resources, impacts to sensitive species and habitats and wetlands resulting from future development within the project areas would be significant. See response to comment O4-2 regarding the proposed trails.

**O4-45:** This comment about the observances of least Bell's vireos is noted. See response to comment I102-13 under comment letter I102. Future development that is proposed on land

adjacent to or containing ESL and/or MHPA would be required to prepare a site-specific biological analysis in accordance with the City's Biology Guidelines in order to verify existing conditions, vegetation communities, and species present. See Section 4.3.4 Issue 1 of the PEIR for an analysis of potential impacts to sensitive species within the project area.

**O4-46:** The Biological Resources Report includes data from the California Natural Diversity Database (CNDDDB). The results from an assessment of the CNDDDB, along with other sources, were used to determine the locations of sensitive wildlife species. See response to comment I102-13 under comment letter I102 for more information.

**O4-47:** See response to comment O4-2 regarding the proposed trails. The programmatic analysis in the PEIR is consistent with that of other program EIRs in that it identifies the potential environmental impacts associated with implementation of the project and provides a mitigation framework to reduce or avoid potential impacts. As a programmatic document, the project description does not provide project-level specifics but does provide feasible development buildout. As described in Section 4.3.6 of the Draft PEIR, mitigation measures are provided at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific projects are proposed. The mitigation measures refer to City regulations (i.e., ESL Regulations and Biology Guidelines) and plans that have incorporated detailed performance standards and are fully enforceable through permit conditions or other legally binding instruments, consistent with CEQA Guidelines Section 15126.4(a)(2). The information provided in the Draft PEIR is appropriate for a program-level analysis, and the mitigation required (MM-BIO-1) would enforce future project compliance with the City's ESL Regulations, Biology Guidelines, and the MSCP SAP and VPHCP. See Section 4.3.1 Issue 1 for a discussion of potential impacts to sensitive species.

**O4-48:** The comment is a general concern about how the project and the project alternatives would be able to meet the project objectives and reduce environmental impacts. Regarding project alternatives, see response to comment O4-23. The project objectives are clearly laid out in Section 3.3 of the PEIR. The ability of the Blueprint SD Initiative, University CPU, and the Hillcrest FPA to meet project objectives is described throughout the environmental analysis of the Draft PEIR and in Chapter 8, which has a description of the project alternatives and their abilities to meet the project objectives in comparison with the proposed project.

**O4-49:** See response to comment O4-2. Impacts to recreation are discussed in Section 4.13 of the PEIR. See response O4-50 regarding edge effects.

**O4-50:** The comment describes the environmental impacts associated with urban development next to undeveloped open space (the urban/wildland interface). As described in Section 4.10.2.2(f) of the Draft PEIR, the MSCP establishes adjacency guidelines to be addressed on a project-by-project basis to minimize direct and indirect impacts and maintain the function of the MHPA. See response to comment A3-5 under comment letter A3.

**O4-51:** The information about trail use in ecological preserves is noted. This comment does not address the adequacy of the analysis in the Draft PEIR, so no further response is required.

**O4-52:** As mentioned in response to comment O4-2, the previously proposed trails would not be a part of the project. Regarding the development of future NRMPs, see response to comment O11-41 under comment letter O11.

**O4-53:** See responses to comments O4-44 and O4-47.

**O4-54:** See response to comment O4-2.

## Comment Letter O5 - Help Save UC

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on the Draft EIR for Blueprint SD, Hillcrest, and University  
**Date:** Friday, April 26, 2024 10:51:42 AM  
**Attachments:** [2024-04-25 HelpSaveUC Comments on DPEIR.pdf](#)

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**From:** Help Save UC <info@helpsaveuc.org>  
**Sent:** Thursday, April 25, 2024 10:53 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoelaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Chris Nielsen <cn@adsc-xray.com>; Andrew Wiese <awiese@sdsu.edu>; Lukes, Suchitra <SLukes@sandiego.gov>  
**Subject:** [EXTERNAL] Comments on the Draft EIR for Blueprint SD, Hillcrest, and University

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

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To Whom It May Concern,

Please find attached our comments on the Draft Program Environmental Impact Report for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update – Document issued March 14, 2024

**O5-1**

Regards,

Help Save UC





April 25, 2024

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

Re: Comments on the Draft Program Environmental Impact Report for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update – Document issued March 14, 2024

To Whom It May Concern:

The undersigned individuals of the community group Help Save UC submit the following comments on the Draft Program Environmental Impact Report for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update Document (hereafter referred to as the “DPEIR”) issued on March 14, 2024 by the City of San Diego (hereafter referred to as the “City”).

O5-2

1. **Combining the Blueprint SD Initiative, Hillcrest Focused Plan Amendment and University Community Plan into one DPEIR was improper.**

For reasons not explained in the DPEIR, three totally unrelated planning proposals/updates were combined into one DPEIR. The “Project” as defined in the DPEIR includes:

O5-3

- A) Blueprint SD, which is a comprehensive amendment to the General Plan that affects the entire City;
- B) the Hillcrest Focused Plan Amendment, which is an amendment to redesignate approximately 380 acres of the Hillcrest and Medical Complex neighborhoods; and
- C) the University Community Plan, which is a comprehensive update to the existing University Community Plan.

O5-3  
cont

While each of these updates involve proposals by the City to increase density, impacts relating to traffic, air quality, biological resources, public services, wildfire, and other areas required a specific analysis of each of the project areas. This did not occur. Instead, the City produced one massive combined document with only a cursory environmental analysis for three highly significant and different projects. This resulted in a document that was cumbersome, overly complicated, three times the length it should have been for any one of the three projects, and clearly designed to discourage the public from engaging in and understanding the project.

First, combining these three projects into one DPEIR resulted in a failure to perform an adequate analysis of any of the three projects. For example, the DPEIR purports to conduct an analysis of 18 separate areas of environmental impact, all of which have subareas, resulting in more than 70 different environmental issues to be analyzed. A comparison of the outcome of the analysis of 70 of these issues reveals that the City reached the same conclusion of environmental impact for all 70 issues for Blueprint SD and the University Plan Update; the Hillcrest Plan Update deviated only once. It is incomprehensible to believe that the results of an environmental analysis for three separate and different projects could be identical on more than 70 issues. This is not analysis by the City; this is a foregone conclusion.

Second, the City attempts to use different variations of Blueprint SD as “alternatives” to the University Plan Update. However, as discussed in Section 6.A below, the Blueprint SD alternatives are not reasonable alternatives for the University Plan Update.

The most telling item is from Section 8.5 of the DPEIR in which the City states that the University CPU and Hillcrest FPA High Density Alternative is considered to be the environmentally superior alternative. As discussed in Section 6.C below, there is no evidence to support this conclusion. However, even if accepted, an environmentally superior alternative that relates only to the University Plan Update and Hillcrest Plan Amendment cannot be used for Blueprint SD, which covers the entire City. One of the most important aspects of an EIR is to identify an environmentally superior alternative, but the City failed to identify such an alternative for Blueprint SD, resulting in an incomplete analysis for this part of the “Project.” This demonstrates that the City was not serious in using this as a final environmental document for Blueprint SD. Thus, its inclusion in this DPEIR could only be to create confusion for the public.

O5-4

Last, combining the University CPU and Hillcrest FPA High Density Alternative as the environmentally superior alternative suggests that these two projects must be considered as one when evaluated by the City Council. This is improper; each Plan Update should be given its own analysis and opportunity for consideration by both the community and the

City Council. The DPEIR is defective on its face for improperly combining these three projects into one DPEIR.

O5-4  
cont

**2. The Environmental Analysis conducted in Chapter 4.0 is inadequate.**

The purpose of a Program EIR should be to evaluate the environmental impacts at full build-out so that each individual project does not have to conduct the same analysis, particularly for cumulative impacts from each project. For this approach to be effective, the original PEIR should conduct a complete analysis of impacts at full build-out. This does not occur in this DPEIR. As a result, each of the environmental analyses are ineffective and incomplete.

O5-5

Furthermore, the DPEIR fails to adequately account for the impact of Complete Communities, which is a density bonus program. The DPEIR discusses that the University Plan Update proposes to add 29,000 housing units to the area; these would be added to the 28,000 currently adopted plan units (of which 26,520 are built), resulting in a total of 57,000 units. This would more than double the number of housing units in the community, which would likely more than double the total population in the community. These numbers will be significantly higher under the Complete Communities density bonus program. However, the environmental analyses conducted in Chapter 4.0 not only fails to adequately analyze impacts from complete build-out, it ignores the additional impacts that could result from the Complete Communities program. The DPEIR is inadequate for the University Plan Update and the Hillcrest Plan Amendment due to its failure to evaluate actual projected population numbers for each area, including population numbers arising from the Complete Communities program.

O5-6

**A. The environmental analysis of Aesthetics is inadequate.**

**1. Scenic Vistas**

With respect to the University Plan Update, on page 4.1-15, the DPEIR states, “While it is unlikely that future development would result in a substantial adverse effect on a scenic vista, including the possible scenic overlooks identified on Figure 27 of the University CPU, it cannot be known at this program-level of review without site-specific plans. At this programmatic level of review, impacts associated with scenic vistas would be considered significant.” This is not an environmental analysis; this is an abdication of responsibility. The whole point of a Program Level EIR is to evaluate full impacts at build-out. The City knows the new zoning proposed in the University Plan Update and knows where new buildings and structures would be built if complete build-out were achieved. Under this DPEIR, the City must conduct an actual analysis of how many buildings might be

O5-7

constructed and what their heights might be, and this evaluation must include consideration of the impact of the Complete Communities program.

Instead, the City did not even try to conduct such an analysis and simply declared the impacts significant, assuming that the City Council will simply adopt a statement of overriding consideration. This approach violates CEQA. California Code of Regulations (CCR) Title 14 §15121(a) states that an EIR is an informational document which will inform public agency decisionmakers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. By failing to conduct an actual analysis of the number and heights of buildings that could impact scenic vistas, the DPEIR fails to provide the information necessary for both decisionmakers and the public to understand the true environmental impact of the University Plan Update on scenic vistas and other aesthetics, and fails to provide the underlying information necessary to adequately evaluate project alternatives.

O5-7  
cont

It is also inadequate for the City to say that potential impacts to scenic vistas would be minimized through required compliance with the University Plan Update's proposed Supplemental Development Regulations (SDRs) and other regulations regarding transition requirements for certain types of development and development adjacent to open space zoned properties. These regulations change existing conditions; the point of the DPEIR is to evaluate environmental impacts from such changes. Even if the City believes that such changed regulations reduce environmental impacts, it is still required to evaluate the impacts from the changes. It is also inadequate for the City to rely on future project-specific environmental review as a means to mitigate any impacts. By engaging in a Program level EIR, future projects will **not** be subject to the same level of public input.

O5-8

Furthermore, the plan policies in the University Plan Update are vague and unenforceable; almost all language actually *requiring* anything has been removed. For example, Policy 1.1C says, "Support strategies that provide transitions in scale, density, and intensity . . ." "Consider the needs of families and children in the design for mixed used development projects . . ." (Policy 1.1I.) "Encourage site design practices that take advantage of sunlight and prevailing breezes to provide a comfortable environment in open space areas." (Policy 2.2C.) "Support design strategies that help to define the edges, boundaries, and transitions between private and public space areas. . ." (Policy 2.2D.) "Promote attenuating noise through the use of berms, planting, setbacks and architectural design . . ." (Policy 2.4C.) "Encourage a pattern and hierarchy of building massing and forms to help reduce the visual bulk of the development." (Policy 2.5A.) "Consider views into and from sloping areas. Encourage rooflines that emphasize the

O5-9

variety in shape and flowing character of the hillside. Promote varying rooftop treatments on sloping sites over extended horizontal lines.” (Policy 2.7F.) “Promote minimizing the use of retaining walls . . . .” (Policy 2.7G.) “Encourage context-sensitive design by stepping back from the canyon edge . . . .” (Policy 2.9A.) “Promote design strategies that reduce light and glare on building frontages facing canyons and open space.” (Policy 2.9B.) “Promote strategies to transition height, density, and intensity between new development and existing residences.” (Policy 2.19D.) (Underline added to all policies for purposes of this letter; underlines not in the Plan Update document.)

O5-9  
cont

As detailed above, all the language used in the plan policies is vague, unenforceable, and completely discretionary by a City who has developed a Plan Update that rejected almost all suggestions submitted by the community. And a review of the SDRs themselves show that they do not “support,” “encourage” or “promote” the plan policies, but actually impose minimal design requirements to achieve these goals. The City’s suggestion that future City (but not public) review and reliance on plan policies and SDRs will help mitigate impacts provides no actual binding mitigation of future impacts.<sup>1</sup>

Finally, the City asserts that aesthetic and parking impacts of a residential, mixed-used residential, or employment center project on an infill site within a Transportation Priority Area (TPA) shall not be considered significant impacts on the environment. (P. 4.1-15.) It is important to note that some areas in the University area are designated as being in a TPA, but the current transit conditions (i.e., a certain level of bus service at the intersections of Governor Dr. and Genesee Ave. or at other locations along Governor Drive) do not meet the requirements to be a TPA, and there is no evidence that bus service will increase to achieve the requirements to be a TPA. The City should not be able to rely on this Public Resource Code exemption unless the area *actually* meets the definition of a TPA.<sup>2</sup>

O5-10

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<sup>1</sup> This issue is pervasive throughout the City’s environmental analysis. The City repeatedly suggests that reliance on “plan policies” can mitigate environmental impacts, but as demonstrated above, this approach is inadequate. This argument (that reliance on “plan policies” is insufficient to mitigate impacts) is applicable to all sections in the EIR where the City has relied on the argument that impacts will be mitigated by plan policies.

<sup>2</sup> Again, the City relies on this Public Resource Code exemption throughout its environmental analysis. This argument (that the City can rely on this exemption to not consider certain environmental impacts even at locations where the area does not currently meet the requirements of a TPA is insufficient to mitigate impacts) is applicable to all sections in the EIR where the City has relied on the argument that impacts need not be considered because the area is in a TPA.



The DPEIR is inadequate with respect to the University Plan Update because it fails to conduct an analysis that considers—at full build-out for the Plan Update—how many new buildings would be constructed, what the height of the new buildings might be, where would they be located, and what impact that construction would have on scenic vistas. A similar analysis including increased densities and building heights under the Complete Communities program must also be performed. Omission of this data results in an inadequate environmental analysis and leads to conclusions not based on evidence.

O5-11

## 2. Visual Character or Quality of Public Views and Scenic Quality

The environmental analysis of impacts to visual character or quality of public views and scenic quality for the University Plan update is similarly deficient. On page 4.1-18, the City admits, “future development which utilizes the City’s Complete Communities Housing Solutions Regulations and/or the City’s Affordable Housing Regulations and associated density bonuses could have greater building heights and/or FAR over the City’s base zone regulations,” but the DPEIR ultimately concludes, “However, at this programmatic level of review without site specific plans, impacts would be considered significant.” This approach/conclusion by the City is inadequate and denies both the public and the City Council the necessary analysis required to make informed decisions.

Also, as discussed above, the City should not rely on the Public Resource Code exemption that it need not consider environmental impacts for areas in a TPA for areas that do not currently meet the requirements to be in a TPA. Until the areas actually meet the criteria of a TPA, the area is deserving of a full environmental analysis.

O5-12

The DPEIR is inadequate because it fails to conduct an analysis that considers—at full build-out for the Plan Update—how many new buildings would be constructed, what their heights might be, where would they be located, and what impact that construction would have on visual character and scenic quality. A similar analysis including increased densities and building heights under the Complete Communities program must also be performed. Omission of this data results in an inadequate environmental analysis and leads to conclusions not based on evidence.

## 3. Light, Glare, or Shade

The environmental analysis of impacts to light, glare or shade for the University Plan Update is similarly deficient. On page 4.1-19, the City again simply states, “However, at this programmatic level of review without site specific plans, impacts with shade would be considered significant.” This approach is inadequate and denies both the public and the City Council the necessary analysis required to make informed decisions.

O5-13

The City’s suggestion that future City (but not public) review and reliance on Plan “policies” will help mitigate impacts provides no actual binding mitigation of future impacts.

The DPEIR is inadequate because it fails to conduct an analysis that considers—at full build-out for the Plan Update—how many new buildings would be constructed, what their heights might be, where would they be located, and what impact that construction would have on shade. A similar analysis including increased densities and building heights under the Complete Communities program must also be performed. Omission of this data results in an inadequate environmental analysis and leads to conclusions not based on evidence.

O5-13  
cont

B. The environmental analysis for Air Quality is inadequate.

Some of the issues the DPEIR is supposed to evaluate for Air Quality impacts are:

- 1) whether the Project, at full build-out, would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under air quality standards;
- 2) whether the project would expose sensitive receptors to substantial pollutant concentrations; and
- 3) if the project would result in odors adversely affecting a substantial number of people. The DPEIR does not adequately analyze these issues for the University Plan Update because it fails to identify the number of new cars or vehicle miles traveled at the completion of full build-out.

O5-14

Page 4.1-18 states that operational emissions are long term and include mobile and area sources including traffic generated by the project. The DPEIR then continues (p. 4.1-18 – 4.1-19) that the project would support additional development in the University Area, that anticipated development densities and intensities would exceed the densities currently anticipated in community plans, and that when increases in densities are proposed, operational emission impacts were found to be significant and unavoidable.

The City then asserts that the University project proposes development that would support the use of public transit, walking, bicycling, etc., but that “operational emissions are assumed to increase due to the increase in proposed densities and intensities.” (P. 4.1-19.) Nowhere, however, does the City discuss the quantitative increase in operational emissions from project build-out. While more people moving into the higher density housing developments might use alternative forms of transit (other than cars), certainly

not all people will. For the University Plan, the Project proposes to add at least 50,000 new residents (based on 30,000 new housing units) at build-out. Even if 50% of those residents use alternative forms of transit (which we submit is an unrealistic assumption), that means 25,000 new residents would be using cars. Note: these excess cars do not include the cars associated with the Complete Communities density bonuses.

O5-14  
cont

The DPEIR must include a quantitative analysis of how many new future residents are expected to drive cars and what the impacts on emissions and odors are on the surrounding community. Such quantitative analysis is imperative to understanding the true impacts of the Project, and to assist with a meaningful alternatives analysis.

The DPEIR is inadequate because it fails to include a quantitative analysis of how many new future residents are expected to drive cars in the University area and what the impacts from such new traffic has on emissions and odors impacting the surrounding community. Omission of this data results in an inadequate environmental analysis and leads to conclusions not based on evidence.

C. The environmental analysis for Biological Resources is inadequate.

To evaluate impacts on Biological Resources, some of the issues the DPEIR is supposed to evaluate are if the Project would have an adverse impact on sensitive habitats and if the Project would interfere substantially with the movement of any native wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The DPEIR does not adequately analyze these issues for the University Plan Update because it fails to identify the impact on these biological resources due to the number of new residents in the area at the completion of full build-out.

Once again, the City includes its catch-all sentence that, “at a program level of review and in the absence of project specific analysis, it is unknown whether all impacts to sensitive plant species would be fully mitigated to a less than significant level. Therefore, at the program level of review, impacts to sensitive plant species resulting from project implementation would be significant.” This catch-22 cannot be allowed (i.e., that the City wants approval for a Program Level Project, but says it cannot do an impacts analysis at the Project Level because it needs specific projects).

O5-15

Additionally, the University City area has numerous designated open spaces that the public uses for recreation such as Rose Canyon and Marian Bear Canyon. The DPEIR discusses the location of future development and the impact the placement of such development may have on biological resources. However, the DPEIR fails to discuss the impact on sensitive habitats and wildlife corridors that would occur by adding more than 50,000 new residents to the area. Based on the addition of new residents alone, Help

Save UC believes that the City's conclusion that the impact the Project would have on wildlife movement or wildlife corridors would be less than significant is incorrect. The addition of 50,000 (or more) new people living in a community, recreating in the canyons, and driving an unknown number of additional cars on adjacent streets, will most certainly have a significant impact on wildlife movement and corridors.

The DPEIR is inadequate because it fails to conduct an analysis of the impact that 50,000 new residents, and their associated cars, would have on sensitive habitat, wildlife movement and wildlife corridors. Omission of this data results in an inadequate environmental analysis and leads to conclusions not based on evidence.

D. The environmental analysis for Greenhouse Gas Emissions is inadequate.

To evaluate impacts from Greenhouse Gas Emissions, the City states that the following issues are to be addressed:

- 1) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? and
- 2) Would the project conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?

The City's environmental analysis is inadequate because it fails to evaluate the first issue entirely.

The City asserts that for plan- and policy-level environmental documents, as well as environmental documents for public infrastructure projects, the City Planning Department prepared a Climate Action Plan Consistency Memorandum, dated June 17, 2022, to provide guidance on significance determination as it relates to consistency with the strategies in the Climate Action Plan. (Page 4.7-13.) The City then states that the City's guidance document requires environmental documents to address the way in which the plan or policy is consistent with the City's goals and policies. Moving to Section 4.7.4 of the DPEIR, on page 4.7-15, the City essentially declares that it is not required to evaluate the Project's net impacts on greenhouse gas emissions; all the City asserts it has to do is evaluate if the Project is consistent with the City's plans and policies.

Help Save UC disagrees with this conclusion and does not agree that under CEQA the City can simply decide that its obligations only require evaluation of consistency with plans and policies, not actual environmental impacts. To the extent the City believes prior state legislation allows circumvention of this requirement, Help Save UC believes that the City

is misinterpreting such statute and associated regulations. Second, the analysis proposed by the City is essentially identical to the second prong of impact analysis (does the project conflict with a plan or policy). This is non-sensical and an abandonment of the City's responsibilities under CEQA. Furthermore, this has led to an incorrect conclusion that the Project's impact on the environment from greenhouse gas emissions is less than significant. When an actual analysis occurs, it seems highly likely that the Project's impact on the environment from greenhouse gas emissions will be significant.

O5-16  
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Indeed, there is no question that the Project will increase greenhouse gas emissions. The University Plan Update proposes to add more than 29,000 new housing units, not accounting for Complete Communities density bonuses. While nowhere in the DPEIR does the City acknowledge an estimated number of new cars on the road, most certainly there will be a net increase in vehicle usage and greenhouse gas emissions, and also increases in greenhouse gasses due to delays at intersections and cars sitting for longer periods of time due to traffic increases. Indeed, the City's Vehicle Miles Traveled (VMT) analysis for the University Plan Update says that VMTs associated with employment land uses would exceed the 85 percent threshold at buildout and therefore would exceed the City's proposed policies, and while VMTs per resident or employee might be reduced, the total number of residents and employees creating VMTs in the area will increase. (Appendix J to DPEIR, pg. 13.)

O5-17

Finally, the City asserts that the University Plan update supports a multimodal strategy through improvements to increase bicycle, pedestrian, and transit access. (P. 4.7-20.) However, there is no requirement to actually implement these strategies. Many strategies require significant transportation upgrades, yet the Plan Update provides no mechanism to fund any of these upgrades, and the City Council has adopted new regulations that do not require that development impact fees be spent in the area where the impact has occurred. Instead, these fees go to a central fund to be spent anywhere in the City that the City deems appropriate. Thus, there is no requirement or guarantee that any of these strategies will be implemented to reduce greenhouse gas impacts.

O5-18

Furthermore, the plan policies in the University Plan Update are vague and unenforceable; almost all language actually *requiring* anything has been removed. For example, Policies 3.5A, 3.5D and 3.5H discuss coordination and collaboration with MTS and SANDAG. Policies 3.5F and 3.5G state the Plan Update will "Support opportunities to enhance amenities with and around transit stations . . ." and "Support and encourage collaboration between business and UC San Diego to incorporate [transit] . . ." (Underline added.) Policies 3.5I and 3.5J state the Plan Update will "Promote public education [about transit] . . ." and "Prioritize transit connections . . ." Policy 3.7A "Encourage[s]

O5-19



implementation or accommodation of infrastructure for electric vehicles . . . .” Policies 3.8A – D state the Plan Update will “Work with public and private entities to encourage [transit share programs”, “Encourage employers to participate in and inform employees [about transit programs”, “Coordinate with new development to post information [about transit programs”, and “Encourage unbundled parking to . . . encourage use of alternative transportation modes.”

O5-19  
cont

All of the language in the plan policies are vague, unenforceable and completely discretionary by a City who has developed a Plan Update that rejected almost all suggestions submitted by the community. The City’s assertion that the University Plan Update supports a transportation strategy that will reduce impacts on greenhouse gas emissions is unsupported, as it relies on language that does not require anything to actually be implemented, nor does it state how any of the public transportation upgrades will be funded.

The DPEIR is inadequate because it fails to conduct an adequate analysis of the impact that the Project, especially the University Plan Update, will have on net greenhouse gas emissions, including but not limited to an increased number of cars and an increase of time waiting at intersections. Omission of this data results in an inadequate environmental analysis, leads to conclusions not based on evidence, causes incorrect conclusions regarding impacts on the environment, and provides insufficient information to the public and the City Council, precluding its ability to conduct an appropriate alternatives analysis.

O5-20

E. The environmental analysis for Hydrology is inadequate.

To evaluate impacts to hydrology, some of the issues that the City is required to evaluate include if the project would:

- 1) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
- 2) If the project would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems; or
- 3) Provide substantial additional sources of polluted runoff.

O5-21

The DPEIR fails to conduct an adequately analysis of either of these issues.

The City admits on page 4.9-42-43 that, “The alteration of drainage patterns and increase in runoff associated with the addition of impervious surfaces and structures can increase

the frequency and amount of flooding and potentially result in accelerating the rate of erosion and siltation through the watershed. . . . For larger projects involving substantial changes in drainage patterns, impervious surfaces, and resulting surface runoff, additional studies are required to determine compliance with the City’s Stormwater Standards Manual as further detailed in Section 4.9.4, Issue 1.”

With respect to the University Plan Update, the City is proposing densities that will more than double the population, not including the impact from Complete Communities. Projects proposed at the corner of Nobel and Genesee Avenues are already proposing to remove significant green areas, and propose to increase building heights by multiple hundreds of feet. Current stormwater standards allow each project to discharge at rates of up to 10% more than current conditions. The past two stormwater years (2022-2023 and 2023-2024) have demonstrated the impact of Climate Change, with rain events creating greater volumes of rain that occur with significantly greater intensity than in the past. Relying on current stormwater management guidelines is insufficient to declare that impacts on erosion, siltation, surface runoff and stormwater drainage systems would be less than significant, particularly given the cumulative effect of so many additional high rises envisioned by the Plan Amendment.

O5-21  
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The City declares, “Furthermore, the City’s Stormwater Department actively maintains and repairs the City’s existing stormwater infrastructure to ensure adequate stormwater conveyance through implementation of the MWMP,” (P. 4.9-44.) The events of this past year, particularly, January 20, 2024, suggest otherwise. Indeed, the City Council has proposed a November ballot measure to increase stormwater fees with a parcel tax. Councilmember Vivian Moreno was quoted as saying, “Funding for stormwater maintenance and infrastructure has never been sufficient in San Diego, and it’s high time we do something about [it].” When discussing the parcel tax for stormwater maintenance, Councilmember Sean Elo-Rivera was quoted as saying, “City leaders have either willfully disregarded the necessary steps to provide folks with services and infrastructure they deserve, or have not been able to understand we simply don’t have the revenue to pay for what our residents wants and deserve.” (See San Diego Union Tribune, February 21, 2024, “San Diego’s proposed flood prevention tax gets one step closer to November ballot.”)

The City cannot, on the one hand, declare in the DPEIR that it provides sufficient stormwater maintenance such that it can more than double the density in a given area without even conducting an environmental impact study, but then on the other hand assert that it must add a new tax to pay for stormwater maintenance activities because the City does not have sufficient resources to provide adequate maintenance.

O5-21  
cont

The DPEIR is inadequate because it fails to conduct an analysis of what the impacts on hydrology, especially for erosion, siltation, runoff, and stormwater drainage, will be on the University Plan area following the proposed increase in construction and density, especially given the City's admission that it has inadequate resources to provide necessary maintenance at this time.

F. The environmental analysis for Noise is inadequate.

The City admits that impacts relating to construction noise would be potentially significant (p. 4.11-15), that impacts relating to stationary sources would be potentially significant (p. 4.11-19), and that the increased traffic-generated noise could result in an increase in ambient noise levels resulting in a significant impact (p. 4.11-19). See also pages 4.11-22-23.

Despite these admissions, nowhere does the City conduct a quantitative analysis of, for example, how many more cars are expected on the road in the University Plan area, and what would be the permanent increase in traffic-related noise. The City asserts that the project is intended to support a shift from vehicle traffic toward transit, pedestrian, and bicycle, but the possibility of some percentage of new residents using these alternative forms of transit does not erase the overall impact that will occur by adding more than 50,000 new residents to an area. It is also important to note that while the University Plan update might encourage building materials for new projects to reduce noise impacts, such regulations do nothing to mitigate the increased noise on wildlife or existing residents. (It is also interesting to note that the DPEIR admits impacts on both air quality and noise from an increase in vehicle traffic, but somehow there are no impacts to greenhouse gas emissions.)

O5-22

The DPEIR is inadequate because it fails to conduct an adequate analysis of the impact on the environment in the University Plan area from the increase in construction noise, non-transportation noise, and traffic-related noise resulting from the increase in construction, density, and new residents proposed in the University Plan Update. Omission of this data results in an inadequate environmental analysis, leads to conclusions not based on evidence, and provides insufficient information to the public and the City Council, precluding the ability to conduct an appropriate alternatives analysis.

G. The environmental analysis for Public Services is inadequate.

The City states that the, "proposed University Plan update would result in a potential buildout of an additional approximately 57,000 dwelling units, or approximately 30,480 additional dwelling units compared to the existing condition." (P. 4.12-34.) The City should clarify this sentence: does the City propose an additional 57,000 dwelling units,

O5-23

or is it a buildout of a total of 57,000 dwelling units with an additional 30,480 dwelling units. The City then continues that, “The increase in residential density and associated demand for fire-rescue services could require the provision of new and/or improved fire stations and fire apparatus in order to maintain fire-rescue service ratios, response times, and other performance objectives . . . .” (P. 4.12-34-35.) The City then asserts that the construction and operation of such new fire stations would result in environmental impacts, but that an environmental review would occur at the time of construction. This is inadequate.

O5-23  
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It is clear that doubling the density in the University Plan area will of course require additional fire-rescue services. The City must do an analysis *now* to determine a) where additional stations could be built; or b) could existing stations be expanded in their current locations as necessary to support future demand? And if so, what will the environmental impacts of such construction and operations be? There is no sensible reason to wait for this analysis, and the City’s failure to include such analysis renders the DPEIR inadequate. In order for the City and the public to be adequately informed of the environmental impacts of the proposed Plan Update, such analysis should occur now to ensure that future fire-rescue services can be provided and to adequately advise the City Council and the public of what the environmental impacts of such additional construction and service will be.

The City’s analysis of police services (p. 4.12-36-37), schools (p. 4-12.-41-42), libraries (p. 4.12-44) and cumulative impacts (p. 4.12-44) are similarly inadequate. The San Diego Unified School District has clearly indicated that the University community will need more elementary schools and that the City should identify possible sites for such schools, but the City fails to do so. The City fails to conduct any actual analysis of what the University community will look like at full build-out following the Plan Update, but says it wants to wait to see what is actually built. Of course, after approving a program level EIR, no actual environmental analysis will then be required in the future. This approach to the DPEIR is inadequate, omits critical data for the public and City Council to evaluate the projects and appropriate alternatives, and leads to conclusions not based on evidence.

H. The City’s environmental analysis on Recreation is inadequate.

The DPEIR discusses that the City has abandoned its prior Parks Master Plan, which requires a certain amount of parkland per resident, and transitioned to the “Recreational Value-Based Park standard” which now uses a points system to evaluate parks. The DPEIR is inadequate because it fails to acknowledge that the City has abandoned its prior Parks Master Plan that acknowledges that a certain amount of land (acres) per resident is prudent and required to support adequate recreation systems. The DPEIR also is

O5-24

inadequate because it fails to include an analysis of the extent to which the University Plan Update will be unable to meet or be inconsistent with the City's Parks Master Plan, which requires certain acres of parkland per resident. Failure to include this analysis provides inadequate information to the public and the City Council, and eliminates the ability to conduct an appropriate alternatives analysis.

O5-24  
cont

The DPEIR is also inadequate as it relies on potential parks that are not located near residences and those where it is unclear if the public will actually be able to access such parks (e.g., the Jewish Community Center and the possible park located amidst hospitals).

I. The City's Transportation environmental analysis is inadequate.

Similar to the Greenhouse Gas Emissions analysis, the City decided that it does not need to evaluate for total impact on the area due to an increase in traffic. The City asserts that prior legislation and the City's 2022 analysis allows it to disregard net traffic impacts (i.e., the additional number of cars on the road) and only look at whether the project will increase or decrease Vehicle Miles Traveled (VMTs) on a per capita basis. Help Save UC disagrees that prior legislation and the City's 2022 CEQA Significant Determinations Thresholds allows the City to skip such crucial analysis. The DPEIR is inadequate because it fails to evaluate the environmental impact of the overall net increase in traffic due to a proposal that will likely more than double the population of the University area.

O5-25

Second, the DPEIR is inadequate because it fails to adequately complete an appropriate VMT analysis. First, the VMT analysis relies on 2016 data, which is already 8 years out of date and does not provide accurate conclusions. Second, the VMT analysis assumes that SANDAG will implement the 2050 Regional Plan, but the City acknowledges that, "it cannot be ensured that full implementation of the Regional Plan's transportation investments will occur." (Appendix J, p. 13.)

O5-26

Furthermore, the DPEIR fails to discuss impacts on the environment from the possibility that even if VMTs per resident decrease, this does not account for time required to complete such VMTs. For example, if 20,000 new cars are on the road in the University area, the total miles traveled by each car might be less, but there is a likelihood that the time to travel such miles will increase, including times waiting at intersections and time waiting for scarce parking spaces, causing impacts to Air Quality, greenhouse gas emissions, and overall impacts on transportation.<sup>3</sup>

O5-27

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<sup>3</sup> The authors of this letter are not planning or land use professionals nor CEQA lawyers. To the extent an issue of adequacy is raised in one section (for example, a section discussing inadequate analysis of transportation impacts), but the concerns overlaps to other areas (such as air quality



The DPEIR is also inadequate with respect to analysis of specific area changes. For example, the University Community Plan Update relies on the installation of “mobility hubs”, but nowhere in either the Plan Update or the DPEIR is there a discussion of what these hubs will look like, whether there is land available for such hubs, or how they will actually work. The University Community Plan Update also proposes to reduce Governor Drive to one lane, but fails to conduct any sort of traffic study or analysis. There is also no analysis of how the reduction of Governor Drive to one lane can accommodate emergency access vehicles when the Plan proposes to add more than one thousand dwelling units to the South University Community area. The City failed to conduct a traffic study based on these proposed changes, but somehow concluded that impacts related to ensure emergency access to the South University Community area (or the University Community area in general) would be less than significant. Omission of this data results in an inadequate environmental analysis, leads to conclusions not based on evidence, and provides insufficient information to the public and the City Council, precluding the ability to conduct an appropriate alternatives analysis.

O5-28

O5-29

J. The City’s environmental analysis of Wildfire impacts is inadequate.

The majority of the University area is located in a very high fire hazard severity zone. (Pg. 4.18-16.) The City then advises the reader of the DPEIR to “Refer to Section 4.18.2.3c for details about local evacuation procedures.” (Pg. 4-18-21.) However, Section 4.18.2.3c is simply one paragraph, which states that the San Diego Fire Department conducts a survey of subdivisions of more than 30 dwelling units that are at significant fire risk. “This program is intended to identify areas of concern relating to the ability of emergency personnel to access an area and to evacuate community members safely and efficiently in the event of an emergency.” (Pg. 4.18-22.) Thus, the City does not actually conduct an analysis to determine if, once the community is at full build-out, an area can be adequately evacuated. The City simply states that another department is supposed to conduct an evaluation, but there is no discussion of whether such evaluation has occurred, or what the results of such evaluation were. This is an inadequate analysis of whether the University community can be safely evacuated during a wildfire following full project build-out.

O5-30

Furthermore, on pg. 4.18-30, with respect to the University area, the City simply states that, “there are adequate evacuation routes within the CPU area in the event of an emergency.” However, there is no discussion of the evacuation routes or what the

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or greenhouse gas emissions), the fact that the issue has been raised under a heading for a certain area (transportation) does not limit the objection to the EIR to such a specific area.

impacts on such routes might be by more than doubling the population in the area, or reducing Governor Drive to one lane. Failure to include such analysis renders the City's evaluation of wildfire impacts inadequate.

O5-30  
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**3. The City's Conclusion that there will be no adverse impacts to Population or Housing is incorrect.**

In Section 5.3, the City asserts that, "No adverse impacts to population or housing are anticipated from implementation of the project" because "development under the project would not support unplanned population growth." (Pg. 5-3.) The DPEIR is inadequate because, for all of the reasons stated above in Section 2, the City completely fails to properly plan for population growth by failing to adequately analyze various environmental impacts, including failure to identify future sites for fire and police stations, future schools or adequate parks.

O5-31

The City also states that, "It is anticipated that most of the new housing units would be absorbed by existing residents of the San Diego area and would assist in accommodating project population growth that would occur without the project." (Pg. 5.3.) The DPEIR is inadequate because this statement is unsupported. The City fails to acknowledge that population numbers have stagnated or actually decreased over the past few years. The City also fails to account for the fact that significant population growth in the University area is due to the increased number of students attending the University of California, San Diego, and fails to account for the additional housing being built on the campus by the University.

O5-32

The City further states that, "The number of additional housing units and the corresponding forecasted number of new residents is not substantial and would contribute to the housing provisions goals of the City's General Plan Housing Element by helping to accommodate regional growth projected for the project areas, the City, and the region as a whole. Therefore, the project is not anticipated to result in overall regional population growth, and there would be no population and housing related impacts." (Pg. 5-3.) This sentence highlights the problem of combining the Blueprint San Diego project with the regional Plan Update for the University area. While the entire Blueprint San Diego project might not cause a substantial increase in new residents, certainly the same cannot be said for the University Plan Update which proposes to double the housing units, and therefore more than double the population, for the University area. Doubling the housing and population in a specific community is a substantial increase. The City's failure to acknowledge this issue and evaluate it separately makes evaluation of this issue inadequate for the purposes of the University Plan update.

Finally, the City states that the City’s target for the 2021-2029 Housing Element cycle is 108,035 housing units. (Pg. 3-4.) If one were to assume that the same number of housing units would be needed for 2030-2039 and 2040-2050, then a total of 324,105 housing units would be needed for the City of San Diego by 2050 (which is the timeline for the University Plan Update). However, recent data indicates that population numbers for the City are stagnant and/or decreasing and this number might actually be less. Regardless, assuming that the 324,105 new housing units number by 2050 is correct, then the addition of 30,430 housing units in the University area allocates approximately 10% of all housing units to be borne by the University area, despite the fact that the City of San Diego has 52 community planning areas. If the total number of housing units were divided among the 52 community planning areas, each planning area would be asked to add only 6,232 housing units until 2050. The University Plan Update asks the University area to add more than 5 times that number – and this is excluding the likely additional housing units that can or will be added under the Complete Communities program.

O5-33

The DPEIR is inadequate in that it fails to analyze why the University Area must absorb so many more housing units than other communities. Proximity to transit could account for some additional units, but given the University Plan Update’s proposal to more than double the number of housing units, and thus at least double the population, the DPEIR must provide an adequate analysis of why the number of additional housing must be added to the University area, and why housing units cannot be distributed more evenly across the 52 community planning areas. Failure to provide this analysis renders the DPEIR’s analysis of housing impacts inadequate.

As a final note, Help Save UC objects to the City’s failure to require onsite affordable and low-income housing. The historical practice of allowing developers to pay in-lieu fees has not created enough affordable housing in the City. Help Save UC believes that the City’s housing crisis is an affordable housing crisis. As detailed in the April 14, 2024 San Diego Union Tribune Article, “Rent Increases Wane,” apartment complexes in the City of San Diego with average rents of approximately \$3,000/month for a one- bedroom apartment have vacancy rates ranging from 16–26 percent. The housing crisis is actually a desperate need for moderate- and low-income housing. The City’s failure to require such on-site housing units with each project will simply add high income housing stock, but will do little to address the critical need for moderate and low income housing.

O5-34

**4. The City’s analysis of Growth Inducement is incorrect.**

For the same reasons as discussed in Section 3, above, the City’s analysis of whether the proposed project could foster population growth and the impacts such growth may have by taxing existing community services facilities (Chapter 6.0) is inadequate. The

O5-35

O5-35  
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University Plan Update may assist the City in adding new housing units, however, the DPEIR is inadequate due to its failure to adequately analyze the impacts on the University community, its services, and the environment due to the City’s unexplained decision to place a disproportionate number of housing units in the University area.

5. **The City’s analysis of significant unavoidable impacts / significant irreversible environmental changes is inadequate.**

The City’s analysis of Significant and Unavoidable Impacts is inadequate. First, the City admits that, of the 18 categories of environmental issues to be evaluated, 12 of those 18 have significant and unavoidable impacts. One of the six categories for which the City asserts there are not significant impacts is greenhouse gas emissions. As discussed above, the DPEIR is inadequate in its analysis of greenhouse gas emissions, and a proper evaluation will demonstrate that the project would have significant impacts on greenhouse gas emissions, at least for the University community area.

However, for the same reasons as discussed in Sections 3 and 4, the City’s analysis that significant and unavoidable impacts will occur is inadequate because the City has improperly and inadequately determined that a disproportionate number of housing units should be placed in the University community area. A proper and adequate analysis of where housing units could be placed throughout the 52 community planning areas in the City of San Diego might have resulted in a fair distribution of housing units across the City. Again, it is possible that more units might be placed in the University community area due to proximity to transit, but the City has provided no analysis or justification as to why 10% of housing units over the next 30 years must be placed in just one of 52 communities. The DPEIR is inadequate for its failure to conduct this analysis, as a proper analysis might very well have resulted in a project that resulted in fewer areas of significant and unavoidable impacts. Indeed, many of the impacts could have been avoidable with a proper analysis.

O5-36

6. **The City’s Evaluation of Project Alternatives is inadequate and its conclusions are not based on evidence.**

A. **The City’s selected alternatives are not reasonable.**

CEQA Guidelines clearly state requirements for how the City must conduct the analysis of project alternatives. CCR Title 14 Section 15126.6 states, in relevant and selected parts:

O5-37

- (a) An EIR shall describe a range of reasonable alternatives to the project . . . which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the

comparative merits of the alternatives. An EIR . . . must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. . . . The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives.

- (b) [A]n EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment . . . the discussion of alternatives shall focus on alternatives to the project . . . which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives . . . .
- (c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed.
- (f) The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency could feasibly attain most of the basic objectives of the project.

O5-3  
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The DPEIR alternatives are:

- 1) No Project Alternative;
- 2) University and Hillcrest High Density (HD) alternative;
- 3) Blueprint SD Distributed Growth Alternative; and
- 4) Blueprint SD Initiative Reduced Density Alternative.

On pages 8-1 – 8-3 of the DPEIR the City lists the projects goals and objectives. However, the DPEIR does not provide any specific discussion regarding how or why it selected each of the specific alternatives considered.

First, the Blueprint SD Initiative Distributed Growth Alternative is not an alternative for either the University Plan Update or Hillcrest Plan amendment. The City states, “The University CPU and Hillcrest FPA would remain the same as in the proposed project in this alternative.” (Pg. 8-29.) Thus, for the University Plan update, this is not an alternative.



Second, the Blueprint SD Initiative Reduced Density Alternative is not a reasonable alternative. The Blueprint SD Initiative that is part of the “project” as defined by the DPEIR, “includes adoption of the Hillcrest FPA and the University CPU.” (Pg. 1-1.) Thus, under the Blueprint SD Initiative itself, there is no different analysis for the University Plan Update. Under the Blueprint SD Initiative Reduced Density Alternative, “the General Plan Land Use and Community Planning Element Figure LU-1 would be amended to reduce the overall density allowances within the Climate Smart Village Areas.” (Pg. S-7.) However, unlike the High Density Alternative and the Blueprint SD Initiative Distributed Growth Alternative, figures of which are provided to show the land use applications and zoning densities (see Figures 8-1 and 8-3), the DPEIR provides no figures nor specific discussion of the Blueprint SD Initiative Reduced Density Alternative that explains where the reduced density would be in the University area. In fact, the word “University” does not appear at all in the discussion for the Blueprint SD Initiative Reduced Density Alternative. (See Section 8.4.) There is simply no way for a reader of the DPEIR to understand the difference between the University Plan Update as proposed in the Project, and how the University area would change under the Blueprint SD Initiative Reduced Density Alternative.

“An EIR . . . must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. . . .” Section 15126.6(a). The DPEIR provides no way for either a decisionmaker or the public to understand how the University Plan Update as proposed in the Project differs from the proposed density in the University area in the Blueprint SD Initiative Reduced Density Alternative. The Blueprint SD Initiative Reduced Density Alternative is not a reasonable alternative when the DPEIR fails to provide any specific discussion that would allow a decisionmaker or the public to compare the two alternatives.

Finally, the DPEIR’s failure to provide any specific discussion regarding how or why it selected each of the alternatives considered is particularly concerning with respect to the decision to use the University and Hillcrest High Density alternative. The City’s Planning Department proposed this High Density alternative for the Plan Update in February 2022. However, the City removed this alternative from consideration in November 2022 and circulated two new alternatives for consideration: A) Scenario A, which is similar to the current proposed University Plan Update / the Project; and B) Scenario B, which proposed to add approximately 22,000 new housing units (less than the 30,000 housing units proposed the Project). The representation to the public was that the High Density alternative was not going to be considered further for the University Plan Update.

Instead, the City indicated that Scenario B, which became the Community Planning Group Subcommittee Input Scenario, would be the alternative evaluated. In fact, the Community

O5-37  
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Discussion Draft of the Plan Update issued in April 2023 included a page called “Community Planning Group Subcommittee Input Scenario.” This page said, “The Community Planning Group Subcommittee Input Scenario was developed to reflect early feedback collected from the University Community Planning Group Subcommittee meetings. This scenario will be considered throughout the Environmental Review process . . .” (See April 2023 University Community Plan and Local Coastal Plan, Community Discussion Draft, pg. 204 of the pdf print version of the document; the page is numbered (apparently incorrectly) 30 in the left-hand corner, underline added.) Not only did the City renege on its promise to the community that the lower density Scenario B would be the scenario considered in the Environmental Review process, it provides no explanation as to why it chose to select a High Density alternative removed from consideration for the Plan Update instead of the lower density alternative (Scenario B) that was the community preferred alternative.

The alternatives “shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” Section 15126.6(f). “The discussion of alternatives shall focus on alternatives to the project . . . which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives . . . .” Section 15126.6(b). A lower density alternative such as Scenario B (the community preferred alternative) could have lessened significant effects of the project while still achieving project goals, but was not considered as an alternative. On the other hand, the High Density alternative was considered and was found to have greater impacts than the Project. This does not comply with CEQA regulations. An alternative that is capable of avoiding or substantially lessening significant effects of the project, i.e., a lower density alternative, should have been considered.

Furthermore, CEQA regulations repeatedly state that alternatives should be feasible. (Section 15126.6(a), (c), (f).) However, Section 8.2.3 of the DPEIR states, “While this [High Density] alternative would achieve the project objectives to the same degree as the project, it was not selected as the project due to unlikelihood that development at the higher intensities would be feasible and actually implemented.” It was therefore improper and contrary to CEQA guidelines for the City to use the High Density option as an alternative as the City has determined it was not feasible. Furthermore, the City’s conclusion that the High Density option is likely not feasible raises these important questions: At what level of density is the project feasible? Where is the City’s analysis that the project is feasible for the University Plan update when the High Density option is not?

O5-37  
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In conclusion, the DPEIR is inadequate because it did not provide reasonable and feasible alternatives for consideration as required by CEQA.

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B. The City's inadequate environmental analysis results in an inadequate analysis of project alternatives.

As discussed in Section 2, above, the City fails to conduct an adequate analysis of the environmental impacts in multiple areas. This failure leads to an omission of critical data which leads to faulty conclusions not based on evidence. Thus, it is impossible for the public and the decisionmakers to conduct an appropriate alternatives analysis when the underlying analysis is faulty.

Furthermore, the analysis conducted of each of the alternatives is inadequate. For example, the VMT analysis is only conducted for the project; there are no VMT analyses for any alternatives. However, despite the lack of data, and the admission that, "The increased residential and non-residential development capacity under this [High Density] alternative could result in greater emissions of GHGs due to greater density and associated vehicles trips" (p. 8-22), the City concludes that, "GHG emissions [under the High Density alternative] are assumed to be similar to the project." (P. 8-23, underline added.) The City has no basis to make this assumption.

O5-38

For the High Density alternative, the City concludes that some impacts would be significant and greater than the project (see aesthetics, p. 8-19, air quality, p. air quality, p. 8-20, noise, p. 8-24-25; wildfire, p. 8-28). However, for some areas, the City concludes that the impacts are significant and the same as the project, but there is no basis for this conclusion. For example, for biological resources, the City simply says, "like the project, impacts to wetlands under this alternative would be significant." (P. 8-20.) But there is no analytical discussion demonstrating that the level of impact would in fact be the same. This same problematic analysis occurs for hydrology (p. 8-24), public services (p. 8-25), and recreation (p. 8-25). But it is non-sensical to accept that the same level of impact will occur on public services and recreation when the project proposes to add approximately 30,000 new homes to the University area, but the High Density alternative proposes to add 57,000 new homes to the University area, especially when there is simply no space for any additional meaningful park space.

O5-39

The DPEIR is inadequate because the comparison of impacts between the project and the High Density alternative omits critical data and the conclusions of this comparison are not based on evidence.

C. The City's conclusion that the High Density alternative is the environmentally superior alternative is not based on evidence.

CEQA Guidelines Section 15126.6(e)(2) requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR.

In Section 8.2.3., the Conclusion to the City's comparison of the Project to the University and Hillcrest High Density Alternative, the City states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Underline added.) Thus, the City clearly concludes in Section 8.2.3 that environmental impacts would increase under the Higher Density alternative.

This is supported by Table 8-1, which compares the impacts of the alternatives. If the reader accepts the City's conclusions, the Project has 12 environmental areas that have significant impacts and 6 areas where the Project has less than significant impacts. For the University High Density alternative, if the reader accepts the City's conclusions, there are 10 environmental areas where the impacts are the same for the Project and the High Density alternative (7 are significant, 3 are less than significant). In four categories, the City finds that both the Project and the High Density alternative have significant impacts, but the impacts from the High Density alternative are even more significant than the impacts from the project. In one category, the City finds that both the Project and the High Density alternative have a significant impact, but the High Density alternative significant impact is slightly less. And finally, for three categories, the City finds that both the Project and the High Density alternative have less than significant impacts, and the High Density alternative impacts are less.

O5-40

Thus, mathematically speaking, both alternatives are the same for 10 categories. For 4 categories, the High Density alternative has greater impacts, and those impacts are significant. For 4 categories the High Density alternative has lesser impacts, but 3 of those are in categories where both projects have less than significant impacts. Thus, by the City's own analysis, the High Density alternative has more significant impacts.

However, the City concludes in Section 8.5 that the "University CPU and Hillcrest FPA High Density Alternative is considered to be the environmentally superior alternative, based on a comparison of the alternatives' overall impacts and their compatibility with the project goals and objectives. While the University CPU and Hillcrest FPA High Density Alternative would not eliminate any significant impacts of the project, it would reduce the significance of impacts in comparison to the project." This conclusion is in direct conflict with the conclusions in Section 8.2.3 (where the City found that the High Density

alternative had greater environmental impacts than the Project) and is contrary to the results of Table 8-1. Furthermore, the City also provides no discussion nor evidentiary support for the assumed conclusion that somehow the alternatives' overall impacts and compatibility with the project goals and objectives must outweigh the greater environmental impacts found in Section 8.2.3 and Table 8-1. Finally, once the City actually performs the appropriate environmental analysis, it will be clear that higher density alternatives (with a higher number of residents), and the increase in greenhouse gas emissions for higher density will have a greater environmental impact.

O5-40  
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Thus, the DPEIR is inadequate because it a) provides conflicting statements regarding which alternative is environmentally superior; and b) provides no evidence to support the City's arbitrary conclusion that the High Density alternative is the environmentally superior alternative.

Help Save UC recommends that the DPEIR be revised to redo the analysis of the environmentally superior alternative as it is clear that the conclusion that the High Density alternative is the environmentally superior alternative is in direct conflict with Section 8.2.3 and Table 8-1 of the DPEIR and is not based on evidence.

D. The City's failure to designate an environmentally superior alternative for Blueprint SD renders the EIR inadequate for Blueprint SD.

CEQA Guidelines Section 15126.6(e)(2) requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR.

The Project includes three separate projects: 1) Blueprint SD; 2) the Hillcrest Plan Amendment; 3) the University Plan Update. The three projects are not related and should have been evaluated separately. Regardless, the DPEIR (erroneously) identifies the Hillcrest and University High Density alternative as the environmentally superior alternative. As this alternative only considers two areas of the City of San Diego, this conclusion cannot be used to support the Blueprint SD project for the entire City of San Diego. As a result, the DPEIR does not identify an environmentally superior alternative for Blueprint SD, and therefore the DPEIR does not satisfy the requirements of Section 15126.6(e)(2).

O5-41

Help Save UC recommends that the DPEIR be revised to remove Blueprint SD from the document as the document clearly does not meet CEQA requirements for Blueprint SD.



## 7. Conclusion.

The DPEIR is inadequate because it falls short of the required informational document that is required to inform public agency decisionmakers and the public of the significant environmental effects of the project and to discuss whether there are feasible and reasonable alternatives that could reduce the significant effects that the project will impose in the University community.

The City's approach to combine the Blueprint San Diego project, the Hillcrest Plan Amendment and the University Community Plan Update into one document created a document that was designed to confuse and discourage the public from providing input on this analysis. The City's failure to identify an environmentally superior alternative that can be used to support a selection of a Blueprint SD project, a required element of an EIR, shows that the City did not intend to use this document to move the Blueprint SD project forward.

O5-42

Second, the DPEIR's environmental analyses of multiple issues is inadequate and does not lead to conclusions based on evidence.

Third, the DPEIR is inadequate because it does not provide reasonable and feasible alternatives for comparison, again leading to conclusions not based on evidence.

Finally, the City's selected environmentally superior alternative conflicts with its own findings in the DPEIR and is not based on evidence.

The DPEIR is inadequate to support the proposed University Community Plan Update and fails to provide the public with a true analysis of environmental impacts from this proposed Plan update, an analysis that both the public and decisionmakers deserve.

Sincerely,

Members of Help Save UC, including:

Andrew Barton  
Linda Beresford  
Linda Bernstein  
Paul Goldstein  
Pablo Lanatta  
Jennifer Martin-Roff  
Nancy Powell  
Thomas Pushpathadam  
Suzy Shamsky

cc: Mayor Todd Gloria  
Councilmember Joe LaCava  
Councilmember Kent Lee  
Suchi Lukes  
Chris Nielsen  
Andy Wiese

**O5: Response to Help Save UC Comment Letter**

**O5-1:** The comment is an introduction to the attached comment letter. No response is necessary.

**O5-2:** The comment is an introduction to the attached comment letter. No response is necessary.

**O5-3:** See response to comment O13-6 under comment letter O13. The Program Environmental Impact Report (PEIR) provides a program-level analysis of the potential impacts that could occur with implementation of the project. As a programmatic document, the project description of the PEIR does not provide project-level specifics but does provide feasible development buildout which is analyzed throughout the PEIR. The PEIR includes a discussion of environmental impacts related to air quality (Section 4.2), biological resources (Section 4.3), public services (Section 4.12), transportation (Section 4.14), and wildfires (Section 4.18).

**O5-4:** The Final PEIR was revised in Section 8.5 to identify both the High Density Alternative and Reduced Density Alternative as the environmentally superior alternatives. In addition, revisions to the Final PEIR were incorporated to clarify the scope of two of the project alternatives, the Reduced Density Alternative and the High Density Alternative. Refer to response to comment O4-23 under comment letter O4 for additional discussion regarding the selection of the environmentally superior alternative.

Regarding the combination of alternatives, the impacts of these alternatives would be similar in all areas of the City, with the resulting impacts incrementally reduced in comparison to the project. For the High Density Alternative, the significance of impacts would be reduced for the issues of energy, greenhouse gas (GHG) emissions, and transportation. For the Reduced Density Alternative, the significance of impacts would be reduced for the issues of aesthetics, air quality, and noise. A separate alternative addressing only the University CPU would not provide any more information that is not already disclosed in the alternatives.

**O5-5:** The EIR assesses programmatic impacts of full buildout of the Hillcrest Focused Plan Amendment (FPA) and of the University CPU as detailed under Section 3.5.2 and Section 3.5.3, respectively. The Blueprint SD Initiative is a long-range development guide that allows the City to align its General Plan City of Villages Strategy to reflect the City's latest goals, policies, and plans for housing, environmental protection, climate change adaptation, and sustainable growth. The Blueprint SD Initiative uses a land use framework as defined by the Village Climate Goal Propensity Map to identify areas that would support development that would allow the City to reach its climate goals of the CAP. This updated growth framework would guide future land use changes in the forms of Community Plan Updates (CPUs), Specific Plans, and FPAs, and Land Development Code amendments. Where appropriate, the PEIR evaluated anticipated build-out of the University CPU, Hillcrest FPA, in addition to Citywide development anticipated under the Blueprint SD Initiative's planning framework. For example, the vehicle miles travelled (VMT) analysis is based on growth projections throughout the City, including assumptions associated with the Blueprint SD Initiative. As future community plan amendments or other land use amendments are proposed consistent with the Blueprint SD Initiative, the City would conduct additional community specific evaluation based on the specific growth targets identified for each community. Although future analysis is anticipated as the Blueprint SD Initiative is implemented, the PEIR provides a programmatic analysis of Citywide growth, including cumulative impacts.

**O5-6:** Comment noted. The Complete Communities program is not a part of the scope of the project analyzed in the Draft PEIR. The environmental impacts of the Complete Communities program were addressed in Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). The Complete Communities Housing Solutions Regulations and the City's Affordable Housing Regulations are included throughout the PEIR as an existing regulation and cumulative consideration. Furthermore, the Draft PEIR considered the potential impacts of the project combined with implementation of density bonus programs. Applicable regulations are cited in Section 4.1.2.2b and analysis of additional density associated with these programs is acknowledged in the impact analysis for Aesthetics (see Section 4.1.4) and Land Use (4.10.4, Issue 3). Please see response to comment O15-5 under comment letter O15.

**O5-7:** The University CPU is a long-range land use plan which would increase the capacity for homes and jobs within the community plan area but does not include site-specific project details. As a programmatic document, the project description does not provide project-level specifics but does provide feasible development buildout, which is analyzed throughout the PEIR. The City cannot reasonably anticipate how many buildings or structures would be built without site specific development proposals and it is speculative to assess site specific developments at the program-level. Future development would be subject to the underlying base zone regulations in the SDMC, which would dictate a development's ultimate height, mass, form, and intensity through the allowable FAR and setback standards, as applicable. Although base zone regulations and other City requirements in the SDMC would ensure impacts would be less than significant in most cases, there is a potential for deviations from the SDMC to be allowed, such as through a Planned Development Permit or allowances for waivers and/or incentives associated with affordable housing; therefore, at the programmatic-level of review, impacts associated with public scenic vistas were found to be significant. See response to comment O5-6 regarding the concern relating to the Complete Communities program. See also response to comment O15-6 under comment letter O15 for additional information regarding public scenic vistas.

**O5-8:** The University CPU Supplemental Development Regulations (SDRs) are appropriately identified as part of the project in the Project Description, Section 3.5.3.1h. The effects of the SDRs have been assessed in Section 4.1.4 and throughout the PEIR, as appropriate. Overall, the purpose of the SDRs are to regulate development, require specific design elements and amenities to implement the vision for the University CPU. As a result, the SDRs are regulations that, once adopted, would support minimization of adverse aesthetic impacts from development. See response O5-7 for additional information. See response to comment O11-11 under comment letter O11 regarding future environmental review.

**O5-9:** Community plans build upon the more general citywide policies established in the General Plan with policy recommendations that apply at the community and neighborhood level. Although the policies are not written to be "required," future discretionary projects would be assessed for consistency with these policies and would be required by the City to incorporate changes if found to be inconsistent.

**O5-10:** Pursuant to Public Resources Code Section 21099(d)(1), aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a Transit Priority Area (TPA) shall not be considered significant impacts on the environment. As discussed in

the Section 4.1.4 of the Draft PEIR, not all future projects would be within a TPA. Therefore, in those instances, where a project is not located within a TPA, at a program-level of review, potential aesthetic impacts are considered to be significant.

**O5-11:** See response O5-7. The Complete Communities program is not a part of the scope of the project analyzed in the Draft PEIR. The environmental impacts of the Complete Communities program were addressed in Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). The Complete Communities program is discussed as a part of the regulatory background in Chapter 3.2.3, and is also discussed as a cumulative consideration.

**O5-12:** See response to comments O5-7 and O5-10.

**O5-13:** See response to comments O5-7 and O5-9 and response to comment O15-8 under comment letter O15. The Complete Communities program is not a part of the scope of the project analyzed in the Draft PEIR. The environmental impacts of the Complete Communities program were addressed in Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). The Complete Communities program is discussed as a part of the regulatory background in Chapter 3.2.3, and is also discussed as a cumulative consideration.

**O5-14:** Per Section 4.2.4 Issue 2 of the Draft PEIR, the project includes program level actions that do not propose any site-specific, physical development at this time. Future site-specific development projects at the time of permitting would involve an analysis of construction and operational emissions, which could exceed air quality standards resulting in a significant impact.

Therefore, as the City is unable to reasonably predict how many future residents would drive cars and as air quality modelling relies upon site specific projects to accurately model emissions, at this program-level of review, hypothetical projects were used to estimate potential emissions from future buildout of a site-specific project. It can be reasonably assumed that all future site-specific projects would be required to adhere to all existing regulations during construction to protect air quality including San Diego Air Pollution Control District (SDAPCD) rules and regulations, and existing state and City regulations in order to proceed to buildout.

Odors are analyzed in PEIR Section 4.2. The project is not anticipated to introduce land uses that would generate substantial odors adjacent to sensitive receptors. While specific, future developments within the project areas are not known at this program level of analysis, planned land uses would not encourage or support uses that would be associated with significant odor generation within proximity to sensitive receptors. Future projects with the potential to result in objectionable odors shall be required to demonstrate compliance with SDAPCD Rule 51 (Public Nuisance), which prohibits the discharge of air contaminants or other materials that would be a nuisance or annoyance to the public.

**O5-15:** Without site-specific development, the City cannot reasonably rule out impacts to sensitive habitats despite the general assumption that future site-specific development would not be within any known land cover types considered sensitive. A program-level document is meant to conservatively address impacts and propose a mitigation framework that would be applied at the project-level to address future site-specific impacts. Please see response to Comment A3-5, A3-7, A3-9, and A3-11 under comment letter A3.



The Draft PEIR conservatively assesses the project's impacts on sensitive habitat, wildlife movement and wildlife corridors in Section 4.3 per the State California Environmental Quality Act (CEQA) Guidelines. The Draft PEIR addresses the impact of physical development directly on wildlife corridors through habitat destruction or fragmentation. As noted in Section 4.3.1.6(c) of the Draft PEIR, the University area has no designated wildlife corridors within the University CPU area. However, it was noted that the canyon networks within the University CPU area are local wildlife movement corridors that expand on regional wildlife corridors. While development under the project is not anticipated to affect critical habitats or these corridors directly, at a program level of review, the specific locations of development and resources present cannot be known with certainty. Future site-specific development adjacent to urban canyons and other wildlife corridor areas would be required to demonstrate consistency with the MSCP Subarea Plan, the Biology Guidelines and implement the MHPA Land Use Adjacency Guidelines to ensure there would be no adverse direct and/or indirect impacts to MHPA lands that could provide function for wildlife movement.

Indirect impacts from humans on the canyons and trails as the commenter notes in their concerns, is assessed as a recreational facility under Section 4.13.4 Issue 1 of the Draft PEIR.

**O5-16:** The analysis contained in the PEIR applies the City's CEQA Significance Determination Thresholds for GHG emissions. The City's CAP was prepared in accordance with CEQA Guidelines sections 15183.5(b), 15064(h)(3), and 15130(d), and thus, the City may determine that a project's incremental contribution to a cumulative greenhouse gas (GHG) effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan (the City's CAP). As outlined in the City's CEQA Significance Determination Thresholds, and included in Chapter 4.7.4, the significance threshold for determining GHG impacts for plan- or policy-level environmental documents is compliance with the Strategies of the CAP. As outlined in the City Planning Department's memorandum, Climate Action Plan Consistency for Plan- and Policy- Level Documents and Public Infrastructure Projects, dated June 17, 2022, plan- and policy-level environmental documents must demonstrate consistency with the goals and policies of the General Plan and the CAP. Chapter 4.7.4 Issue 2d provides a consistency analysis of the project with the six strategies of the CAP. As the project would be consistent with the CAP, it would be consistent with the CAP GHG emissions inventory and emission projections provided in the CAP. As concluded in the PEIR, the project would be consistent with the CAP and impacts would be less than significant.

**O5-17:** See response to comment O7-4 and comment O7-69 under comment letter O7.

**O5-18:** The project provides policies that support improvements to pedestrian, bicycle, transit, and roadway facilities while reducing per capita VMT and increasing alternative mode share. Future discretionary projects would be subject to the preparation of a Local Mobility Analysis (LMA). The LMA is intended to identify the transportation effects of proposed development projects and to determine the need for any improvements to the adjacent and nearby road system to achieve acceptable mobility for vehicles, bicyclists, pedestrians, and transit. Should the LMA find that road improvements would be necessary to maintain acceptable mobility standards, such improvements would be included as project design features.

**O5-19:** See response to comment O5-9.

**O5-20:** See response to comment O5-16. The City's threshold for traffic-related impacts, as found in the City's CEQA Significance Determination Thresholds, is based on a project's VMT and not traffic congestion.

**O5-21:** All development is required to comply with the City's Stormwater Standards Manual, Drainage Design Manual, and Jurisdictional Runoff Management Plan (JRMP). Generally, smaller infill projects would not substantially increase impervious surface area and implementation of onsite stormwater construction BMPs in compliance with the City's JRMP would minimize impacts. For larger projects involving substantial changes in drainage patterns, impervious surfaces, and resulting surface runoff, additional studies are required to determine compliance with the City's Stormwater Standards Manual as further detailed in Section 4.9.4, Issue 1. Erosion and siltation resulting from increased runoff can be generally avoided or reduced through site design, source control and structural pollutant control BMPs, and hydromodification management requirements, as required for certain types of projects in compliance with the City Stormwater Standards Manual and Drainage Design Manual.

The City's existing regulatory framework would ensure that future development would implement requirements for onsite LID BMPs, such as stormwater detention/retention BMPs set forth in the City's Stormwater Standards Manual, to minimize impervious areas and, as a result, simultaneously reduce project runoff and the potential transport of pollutants to the City's stormwater drainage systems.

**O5-22:** Noise impacts resulting from implementation of the University CPU are analyzed in Section 4.11 of the Draft PEIR. Noise impacts were evaluated based on the applicable criteria in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). Future discretionary development within the University CPU area would be reviewed for consistency with University CPU policies and all development in the University CPU area would be required to comply with the SDMC property line noise level limits to ensure stationary noise sources comply with applicable standards at the property line. At a programmatic level of review, it cannot be ensured without site-specific development details, which are not available at this time, whether impacts could be reduced to less than significant in all cases. However, the City's Noise Ordinance property line standards would apply to all future discretionary and ministerial development under the project.

Recent CPU EIR analyses have shown that various roadways within the project areas currently generate roadway noise above the levels described above for specified land uses. Traffic noise levels under the Blueprint SD Initiative, Hillcrest FPA, and University CPU are expected to contribute to additional traffic noise levels in excess of compatible noise levels for specified land uses defined in the City's land use – noise compatibility guidelines. At a program level of review, no additional mitigation is available to support further impact reductions.

See response to comment O15-16 regarding the analysis of GHG emissions.

**O5-23:** As discussed in Section 3.5 of the PEIR, implementation of the University CPU would allow up to approximately 57,000 units as compared to the adopted plan which allows up to approximately 28,000 units.

Impacts to public services and facilities are discussed in Section 4.12 of the PEIR. The project does not propose site specific fire stations, police stations, and libraries. As discussed in Section 4.12, implementation of the University CPU could result in the need for additional public services facilities, the construction and operation of which could result in environmental impacts. At the program level of analysis without project-specific details, the specific impacts and the extent of impacts related to the development of these public services facilities cannot be assessed because the size, type, and location of these projects is not known at this time. Future public service and infrastructure projects would be required to comply with regulations in existence at the time which would reduce potential environmental impacts and would undergo project-specific environmental review, at which time environmental impacts would be identified and addressed. At a program level of analysis, impacts to public services and facilities were determined to be significant.

Please see response to comment O13-4 under comment letter O13 regarding schools. Future projects that are consistent with the University CPU and associated PEIR could tier off of the PEIR and, depending on the scope of future projects, future environmental review for consistent projects might include tiered Mitigated Negative Declarations (MNDs), tiered EIRs, or other tiered environmental analysis in accordance with of CEQA Guidelines Sections 15152, 15153, 15162, 15163, 15164, 15168, and/or 15183. This condition does not preclude the environmental analysis of future projects from happening. Please see response to comment O7-49 under comment letter O7.

**O5-24:** The City's Parks Master Plan established a new park standard, the Recreational Value-Based Park Standard (Value Standard) which outlines the standard for providing population-based parks, known as the Recreational Value -Based Park Standard, which establishes a point value to represent recreational opportunities within population-based parks to assess the need for upgrades and new park facilities. The Parks Master Plan serves as a policy framework to guide future park development efforts in the City. The Parks Master Plan is referenced in Section 4.13.2.2b. of the PEIR Please see response to comment O15-14 under comment letter O15.

The Draft PEIR notes in Section 4.13.4 Issue 2.c. that the University CPU identifies new parks at Regents Road North and South and at Governor Drive, a new pocket park at Nobel Drive, a promenade along Executive Drive, and a new neighborhood park adjacent to Torrey Pines City Park. However, the University CPU does not propose specific parks or recreational facility projects to be implemented at this time and impacts would be assessed at the project-level as future parks and recreational facility projects are proposed.

**O5-25:** Please see response to comments O13-1 and O13-2 under comment letter O13.

**O5-26:** Please see response to comment O13-2 under comment letter O13.

**O5-27:** Please see response to comment O13-1 and O13-2 under comment letter O13.

**O5-28:** The University CPU is a long-range land use plan intended to guide future development within the University CPU area, but it does not provide project-specific details. The mobility hubs proposed within the University CPU area would be designed at the time of proposal and compliance with the existing regulations at the time future projects are proposed as well as project-specific mitigation measures, as applicable, would reduce potential environmental impacts associated with the construction and operation of these mobility hubs.

**O5-29:** Please see response to comment O13-1, O13-2, and O13-3, under comment letter O13.

**O5-30:** Please see response to comment O13-3 under comment letter O13.

**O5-31:** As discussed in the Draft PEIR, buildout of the University CPU could require the construction of new public services facilities to accommodate growing demand, and the construction and operation of these facilities could result in environmental impacts. The University CPU is a long-range planning document that does not include project-specific details for specific public services facilities developments. Therefore, the potential environmental impacts associated with the construction and operation of these future facilities cannot be determined at this time. The development of future public services facilities would be subject to a separate environmental review, and compliance with the regulations existing at the time as well as project-specific mitigation, as applicable, would reduce potential environmental impacts associated with the construction and operation of these new facilities.

**O5-32:** See response to comment O15-3 for a discussion of the University of California, San Diego's Long-Range Development Plan. See also response to comment O11-28 under comment letter O11 and response to comment O15-5 under comment letter O15.

**O5-33:** See response to comment O11-28 under comment letter O11 and response to comment O15-5 under comment letter O15.

**O5-34:** The University CPU includes SDR-J.1 which addresses housing equity and affordability by requiring that development within the University CPU CPIOZ – Type A area that includes a residential use shall satisfy the City's Inclusionary Affordable Housing Regulations (SDMC Chapter 14, Article 2, Division 13) through either the provision of on-site affordable dwelling units or off-site affordable units within a Sustainable Development Area within the University CPU area or shall be required to pay the Inclusionary Affordable Housing In-Lieu Fee. Please see response to comments O15-18 and O15-19 under comment letter O15. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O5-35:** Please see response to comment O11-28 under comment letter O11 and response to comment O15-5 under comment letter O15. Please see response to comment O7-50 under comment letter O7.

**O5-36:** See response to I82-11 regarding the adequacy of the EIR analysis and the appropriate use of the City's Significance Threshold for GHG emissions. See also response to O15-5 under comment letter O15.

**O5-37:** Refer to response to comment O4-23 under comment letter O4.

**O5-38:** The level of analysis for all of the alternatives in Chapter 8 of the PEIR is an appropriate level of analysis because the objective of the alternatives section is to provide public agencies with a range of feasible alternatives, so that they may compare the potential significant impacts of the proposed project with those of the alternative projects. Pursuant to CEQA Guidelines Section 15126.6(d), the analysis should include a comparison of the alternative's potential impacts with those of the proposed project, but the analysis does not need to include an assessment at the same

level of detail as that of the proposed project. The VMT discussion for the Alternatives relies upon the VMT analysis for the project since VMT can be directly correlated to the density of residential development proposed as it is a VMT generating land use. Therefore, as the Alternatives propose a higher or lower density than the project, it can be assumed that VMT would be directly correlated to this increase or decrease. Further, the Final PEIR was revised in Section 8.2.2.g to clarify the conclusions for GHG emissions for the High Density Alternative.

See response to comment I82-11 under comment letter I82 for a discussion of GHG emission impacts.

**O5-39:** See response to comment I82-4 under comment letter I82 and response to comment O4-23 under comment letter O4 regarding the required scope of an Alternatives analysis. The Alternatives analyses relies on a programmatic-level assessment. Regarding biological resources, the impacts of the project and the alternative would be the same because the alternative assumes development would occur within the same footprint but with higher densities (e.g. greater height and FAR). In regard to the High Density Alternative, the EIR notes as the location of potential future parks and recreational facilities cannot be determined at this time, it is unknown what specific physical impacts may occur and the extent of these impacts and thus impacts would be potentially significant. This is similar to the project analysis because specific parks are not proposed for implementation at the time; therefore, the specific impacts cannot be known with certainty. Further, the level of analysis for alternatives need not be as detailed as the analysis for the project.

**O5-40:** See response to comment O5-4 and response to comment O4-23 under comment letter O4.

**O5-41:** See response to comment O13-6 under comment letter O13. See also response to comment O5-4 and response to comment O4-23 under comment letter O4.

**O5-42:** The conclusion of the letter has been noted. Responses to the summary of issues are contained in the preceding responses.



## Comment Letter O6 - Linda Vista Community Planning Group

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] LVPG Approved Comment on Blueprint SD PEIR  
**Date:** Tuesday, April 30, 2024 8:42:11 AM  
**Attachments:** [LVPG -Blueprint SD APPROVED COMMENT PEIR.pdf](#)

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**From:** Felicity Senoski <happydogz247@yahoo.com>  
**Sent:** Friday, April 26, 2024 10:53 AM  
**To:** [PLN\\_PlanningCEQA](#) <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** CouncilMember Raul Campillo <[RaulCampillo@sandiego.gov](mailto:RaulCampillo@sandiego.gov)>; Noel, Miles <[MNobel@sandiego.gov](mailto:MNobel@sandiego.gov)>; LVPG Secretary <[lvpgsecretary@gmail.com](mailto:lvpgsecretary@gmail.com)>  
**Subject:** [EXTERNAL] LVPG Approved Comment on Blueprint SD PEIR

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Dear [planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov):

On April 22, 2024, the Linda Vista Planning Group voted unanimously to provide the following comment on the Programmatic Environmental Impact Report (PEIR) associated with Blueprint SD:

1. Based on the needs of individual community-based plans, that may shift and change over time, tiered CEQA analysis is not appropriate; community plan EIRs should be a requirement.

O6-1

Sincerely,

Felicity Senoski

Linda Vista Planning Group Chair

[Happydogz247@yahoo.com](mailto:Happydogz247@yahoo.com)

CC:

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

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

[LVPGsecretary@gmail.com](mailto:LVPGsecretary@gmail.com)

April 26, 2024

Dear [planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov):

On April 22, 2024, the Linda Vista Planning Group voted unanimously to provide the following comment on the Programmatic Environmental Impact Report (PEIR) associated with Blueprint SD:

1. Based on the needs of individual community-based plans, that may shift and change over time, tiered CEQA analysis is not appropriate; community plan EIRs should be a requirement.

Sincerely,  
Felicity Senoski  
Linda Vista Planning Group Chair  
Happydogz247@yahoo.com

CC:

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

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

[LVPGsecretary@gmail.com](mailto:LVPGsecretary@gmail.com)

**O6: Responses to Linda Vista Community Planning Group Comment Letter**

**O6-1:** See response to comment O13-6 under comment letter O13 and response to comment O11-11 under comment letter O11. The City will continue to engage with community planning groups, community members, and the public as Community Plan Updates are proposed.

**Comment Letter O7 - Everett DeLano on Behalf of Livable San Diego Comment Letter**

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Blueprint SD Initiative DEIR  
**Date:** Tuesday, April 30, 2024 9:25:03 AM  
**Attachments:** [Comments re Blueprint SD DEIR.pdf](#)

---

**From:** everett@delanoanddelano.com <everett@delanoanddelano.com>  
**Sent:** Monday, April 29, 2024 4:45 PM  
**To:** DSD EAS <DSDEAS@san Diego.gov>; PLN\_PlanningCEQA <planningceqa@san Diego.gov>  
**Subject:** [EXTERNAL] Blueprint SD Initiative DEIR

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---

Please see attached comment letter. Because of file size, I will be sending additional comment letters under separate cover.

Please confirm receipt.

Thank you,

Everett DeLano  
*DeLano & DeLano*  
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O7-1





# DELANO & DELANO

April 29, 2024

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

Re: Blueprint SD Initiative Draft EIR, SCH No. 2021070359

Dear City of San Diego:

This letter is submitted on behalf of Livable San Diego in connection with the proposed Blueprint SD Initiative (“Project”) and related Draft Environmental Impact Report (“EIR”).

O7-2

## I. Introduction

The California Environmental Quality Act (“CEQA”), Pub. Res. Code §§ 21000 – 21177, must be interpreted “so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal. App. 3d 247, 259. If an EIR fails to provide agency decision-makers and the public with all relevant information regarding a project that is necessary for informed decision-making and informed public participation, the EIR is legally deficient and the agency’s decision must be set aside. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 712. An EIR is “aptly described as the ‘heart of CEQA’”; its purpose is to inform the public and its responsible officials of the environmental consequences before they are made. *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 392.

O7-3

“An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences.” CEQA Guidelines § 15151. A sufficient EIR demonstrates “adequacy, completeness and a good-faith effort at full disclosure.” *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1355 (quoting *Rio Vista Farm Bureau Center v. City of Solano* (1992) 5 Cal.App.4th 351, 368).

II. The Project Description is Inadequate

“An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.” *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193. The DEIR fails to provide an adequate Project description.

The DEIR fails to provide information on the increase of the residential unit capacity and the number of residential units and non-residential square footage for Blueprint SD. Under Project Description the DEIR refers to a land use modeling effort and methodology as part of Vehicle Miles Traveled (“VMT”) analysis in Appendix J, however, without discussing these projections, it merely states “future land use changes within the Climate Smart Village Areas would be further defined as part of future CPUs, specific plans, and/or focused plan amendments.” DEIR at 3-25.

O7-4

The DEIR also discusses amendments to the Land Development Code, but fails to provide any specific information as to the nature of those amendments, merely asserting they “may include, but not be limited to” four general areas. DEIR at 3-26.

III. The DEIR’s Discussion of Project Impacts is Deficient

The DEIR claims “implementation of the planning level actions is addressed [throughout the environmental analysis], in addition to the potential future plan amendments, and future individual development projects that may be implemented consistent with relevant plans.” DEIR at 4-1. Blueprint SD proposes an updated land use framework defined by the Village Climate Goal Propensity Map that would “guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development.” DEIR at 4.1-11. While the Blueprint SD is expected to increase density, the DEIR fails to provide a description of such increase, including the increase of the residential unit capacity and the number of residential units and non-residential square footage. This fundamental failure leads to insufficient analysis of the Project’s environmental impacts.

O7-5

The DEIR fails to adequately analyze aesthetic impacts.

O7-6

- The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.
- The DEIR fails to address how extensive aesthetic impacts will be or where they will occur.

O7-7

O7-8

The DEIR fails to adequately analyze impacts to air quality.

O7-9

- The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.
- The DEIR states: “The project includes planning level actions that do not propose any physical development at this time” and concludes that adoption of the Project at this time would not result in impacts related to air quality. DEIR at 4.2-15. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.
- In fact, the VMT analysis provides three model runs that identify number of dwelling units as projection of growth anticipated from 2022 to 2050. DEIR Appendix J. These numbers alone indicate the potential physical development needed to accommodate the anticipated growth induced by Blueprint SD and the resulting potential environmental impacts. The DEIR fails to provide any such analysis.
- The attached comments from SWAPE identify deficiencies in the analysis of impacts.

O7-10

O7-11

O7-12

O7-13

The DEIR fails to adequately analyze traffic impacts.

O7-14

- The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.
- The DEIR states: “The project includes planning level actions that do not propose any physical development at this time” and concludes that adoption of the Project at this time would not result in impacts related to air quality. DEIR at 4.2-15. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.
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O7-15

O7-16

O7-17



the resulting potential environmental impacts. The DEIR fails to provide any such analysis.	07-17 cont.
The DEIR fails to adequately analyze impacts to biological resources.	07-18
<ul style="list-style-type: none"><li>• The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.</li></ul>	07-19
The DEIR fails to adequately analyze greenhouse gas emission impacts.	07-20
<ul style="list-style-type: none"><li>• The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.</li></ul>	07-21
<ul style="list-style-type: none"><li>• The DEIR states: “The project includes planning level actions that do not propose any physical development at this time” and concludes that adoption of the Project at this time would not result in impacts related to air quality. DEIR at 4.2-15. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. <i>Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova</i> (2007) 40 Cal.4<sup>th</sup> 412, 428; <i>Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners</i> (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 &amp; 15151.</li></ul>	07-22
<ul style="list-style-type: none"><li>• In fact, the VMT analysis provides three model runs that identify number of dwelling units as projection of growth anticipated from 2022 to 2050. DEIR Appendix J. These numbers alone indicate the potential physical development needed to accommodate the anticipated growth induced by Blueprint SD and the resulting potential environmental impacts. The DEIR fails to provide any such analysis.</li></ul>	07-23
<ul style="list-style-type: none"><li>• The DEIR identifies emissions associated with vehicle trips, yet fails to account for how these trips were calculated, since the traffic analysis failed to include such information.</li></ul>	07-24
<ul style="list-style-type: none"><li>• The attached comments from SWAPE identify deficiencies in the analysis of impacts.</li></ul>	07-25
The DEIR fails to adequately analyze land use impacts.	07-26
<ul style="list-style-type: none"><li>• The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.</li></ul>	07-27

The DEIR fails to adequately analyze noise impacts.

O7-28

- The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.
- The DEIR discusses potentially significant construction and operational noise impacts but chooses to assume they would be less than significant by using an hourly average. But the temporary nature of a noise impact does not make it insignificant. *See Berkeley Keep Jets Over the Bay Comm. v. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344, 1380 – 81.

O7-29

O7-30

The DEIR fails to adequately analyze impacts to waters and drainages.

O7-31

- The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.

O7-32

The DEIR fails to adequately analyze impacts to public services and facilities.

O7-33

- The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.

O7-34

The DEIR fails to adequately analyze water supply impacts.

O7-35

- The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.
- There is an inadequate showing of water supply for the Program. The California Supreme Court recently identified three “principles for analytical adequacy under CEQA”: (1) “CEQA’s informational purposes are not satisfied by an EIR that simply ignores or assumes a solution to a problem of supplying water to a proposed land use project”; (2) “an adequate environmental impact analysis for a large project, to be built and occupied over a number of years, cannot be limited to the water supply for the first stage or the first few years”; and (3) “the future water supplies identified and analyzed must bear a likelihood of actually proving available .... An EIR for a land use project must address the impacts of likely future water sources, and the EIR’s discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water’s availability.” *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*

O7-36

O7-37



(2007) 40 Cal.4<sup>th</sup> 412, 430 – 32 (emphasis in original) (citations omitted).  
The DEIR fails to comply with these mandates, particularly in light of recent severe water shortages throughout the State.

O7-37  
cont.

The DEIR fails to adequately analyze cumulative impacts.

O7-38

- The DEIR fails to provide specific information on the increase of the residential unit capacity and the number of residential units and non-residential square footage, thereby failing to address the Project’s significant impacts.
- The DEIR fails to consider the impacts associated with development of other density-adding programs and projects in concert with the Project. These include Complete Communities and other recently-approved programs to spur further development.
- Comments from Neighbors for a Better San Diego indicate that the DEIR substantially understates the potential for various programs to provide additional development. This only further demonstrates how the DEIR fails to adequately consider cumulative impacts in a host of areas.

O7-39

O7-40

O7-41

The DEIR fails to adequately analyze growth inducement impacts.

O7-42

- The DEIR claims the implementation of the Project would not be growth inducing, “rather its purpose is to direct planned growth to appropriate locations to implement existing policies.” DEIR at 6-2 and 3. Yet, the DEIR does not provide any explanation on how these policies will be integrated with Project implementation.
- Further, the DEIR provides: “with the proposed project, services will need to expand to keep ratios of personnel to population consistent with General Plan goals; however, this expansion will occur incrementally, allowing the City to adjust over time to the increased demand.” DEIR at 6-2. However, it does not provide further information on how the City plans to accommodate this increase.

O7-43

O7-44

Additionally, the DEIR fails to apply the City’s own CEQA Significance Determination Thresholds (“City CEQA Thresholds”). Those thresholds identify relevant criteria for consideration of environmental impacts, which the DEIR ignores. For example:

O7-45

1. The DEIR fails to address potential aesthetic, visual and neighborhood character impacts by, *inter alia*, assessing whether the activity would:
  - a. “Project bulk, scale, materials, or style which would be incompatible with surrounding development?” City CEQA Thresholds at 73.
  - b. Involve “[s]ubstantial alteration to the existing or planned character of the area ...?” *Id.*

O7-46

- c. Involve “[t]he loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan?” *Id.*
  2. The DEIR fails to address potential air quality impacts by, *inter alia*, assessing whether the activity would:
    - a. “Exceed[] 100 pounds per day of Particulate Matter ....” City CEQA Thresholds at 6.
    - b. Involve “[s]ubstantial alternation of air movement in the area ....” *Id.*
  3. The DEIR fails to address potential noise impacts to by, *inter alia*, assessing whether the activity would:
    - a. “Result in land uses which are not compatible with aircraft noise levels as defined by an adopted airport Comprehensive Land Use Plan (CLUP)?” City CEQA Thresholds at 52.
  4. The DEIR fails to address potential impacts to public services by, *inter alia*, assessing whether the activity would:
    - a. “conflict with the community plan in terms of the number, size, and location of public service facilities.” City CEQA Thresholds at 61.
    - b. “provide for adequate SDFD access ....” *Id.*
    - c. “substantially affect Police or Fire-Rescue response times.” *Id.*
    - d. Comply with the General Plan’s guidelines and standards for libraries. City CEQA Thresholds at 62 – 63.
    - e. Comply with the General Plan’s guidelines and standards for parks and recreation resources. City CEQA Thresholds at 63.
  5. The DEIR fails to address potential growth inducement impacts by, *inter alia*, assessing whether the activity would:
    - a. “Induce substantial population growth in an area ...?” City CEQA Thresholds at 29.
    - b. “Substantially alter the planned location, distribution, density or growth rate of the population in an area?” *Id.*
    - c. “Include extensions of roads or other infrastructure not assumed in the community plan or Capital Improvements Project list ...? *Id.*

O7-46 cont.

O7-47

O7-48

O7-49

O7-50

#### IV. The DEIR’s Discussion of Mitigation and Alternatives is Deficient

CEQA contains a “substantive mandate” that agencies refrain from approving a project with significant environmental effects if “there are feasible alternatives or mitigation measures” that can substantially lessen or avoid those effects. *Mountain Lion Foundation v. Fish and Game Comm.* (1997) 16 Cal.4<sup>th</sup> 105, 134; Pub. Res. Code § 21002. It “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.” *Sierra Club v. Gilroy* (1990) 222 Cal.App.3d 30, 41. The DEIR is required to consider, and the City is required to adopt feasible mitigation and alternatives that can lessen or avoid the significant Project impacts. *City of Marina v. Board of Trustees of the California State Univ.* (2006) 2006 39 Cal.4<sup>th</sup> 341, 360; *see also* CEQA Guidelines § 15126.6(b).

O7-51



The DEIR fails to provide sufficient degree of analysis for the planned city-wide future development and fails to adequately analyze the impacts associated with these substantial changes. Based on the analysis conducted, the DEIR found that the Project would result in significant and unavoidable impacts in 12 areas, the EIR fails to adequately discuss or consider feasible mitigation to address any of these several significant impacts. “If, as so many courts have said, the EIR is the heart of CEQA, then to continue the anatomical metaphor, mitigation is the teeth of the EIR. A gloomy forecast of environmental degradation is of little or no value without pragmatic, concrete means to minimize the impacts and restore ecological equilibrium. Thus, CEQA requires project proponents to mitigate all significant environmental impacts of their project.” *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4th 1018, 1039.

O7-52

A. The DEIR’s Discussion of Mitigation is Insufficient

The EIR acknowledges significant and/or cumulative environmental impacts to “aesthetics; air quality; biological resources; cultural resources; hazards and hazardous materials, hydrology; noise; public services; recreation; transportation; tribal cultural resources; utilities and services systems; water quality; and wildfire.” EIR at 8-1. Yet the EIR fails to adequately discuss or consider feasible mitigation to address any of these several significant impacts. *See id.* at 7-1 to 2.

O7-53

For example, in discussing aesthetics impacts, the DEIR acknowledges at “this programmatic level of review without site-specific plans, impacts associated with scenic vistas would be significant.” DEIR at 4.1-13. The DEIR claims that the potential impacts would be addressed through compliance with the existing regulatory framework, “it is not possible to ensure all future impacts could be fully mitigated to less than significant” without specific plans. DEIR at 4.1-22. Yet, the DEIR fails to provide any feasible alternatives or mitigation measures at program level.

O7-54

This failure is repeated for each of the acknowledged significant impacts. And in each instance, the City’s claims “of infeasibility [are not] supported by substantial evidence,” particularly since the EIR fails even to discuss or consider possible mitigation. *County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4th 86, 100 (citing Pub. Res. Code § 21081.5; CEQA Guidelines § 15091(b)).

O7-55

The attached comments from SWAPE identify deficiencies in the analysis of mitigation.

O7-56

B. The DEIR’s Discussion of Alternatives is Insufficient

“Under CEQA, the public agency bears the burden of demonstrating that, notwithstanding a project’s impact on the environment, the agency’s approval of the proposed project followed meaningful consideration of alternatives.” *Pesticide Action*

O7-57

*Network v. California Dept. of Pesticide Regulation* (2017) 16 Cal.App.5<sup>th</sup> 224, 247. As noted above, the EIR identifies several significant impacts. Yet it fails entirely to consider and analyze alternatives that would actually reduce or eliminate those impacts. “Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment [], the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” CEQA Guidelines § 15126.6(b) (emphasis added).

O7-57  
cont.

The DEIR fails to consider and identify an environmentally superior alternative.

O7-58

The DEIR also fails to identify the specifics of any proposed reduced density alternative, thereby making careful consideration and analysis of such an alternative impossible.

O7-59

Furthermore, the Project and its objectives are defined too narrowly, thereby resulting in a narrowing of the consideration of alternatives to the Program. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1455.

O7-60

V. The DEIR Should be Recirculated

O7-61

The DEIR is sufficiently lacking that the only way to fix these issues is to revise it and recirculate an adequate report.

VI. Conclusion

For the foregoing reasons, Livable San Diego urges you to reject the Project and EIR as drafted. Thank you for your consideration of these concerns.

O7-62

Sincerely,



Everett DeLano

Enc.

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] RE: Blueprint SD Initiative DEIR  
**Date:** Tuesday, April 30, 2024 9:25:17 AM  
**Attachments:** [2024.4.29 BlueprintSD Commentletter FinalPDF.pdf](#)

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**From:** everett@delanoanddelano.com <everett@delanoanddelano.com>  
**Sent:** Monday, April 29, 2024 4:45 PM  
**To:** DSD EAS <DSDEAS@san Diego.gov>; PLN\_PlanningCEQA <planningceqa@san Diego.gov>  
**Subject:** [EXTERNAL] RE: Blueprint SD Initiative DEIR

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Please see attached comment letter.

O7-63

Everett DeLano  
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---

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**Sent:** Monday, April 29, 2024 4:45 PM  
**To:** 'DSDEAS@san Diego.gov' <[DSDEAS@san Diego.gov](mailto:DSDEAS@san Diego.gov)>; 'PLN\_PlanningCEQA' <[planningceqa@san Diego.gov](mailto:planningceqa@san Diego.gov)>  
**Subject:** Blueprint SD Initiative DEIR

Please see attached comment letter. Because of file size, I will be sending additional comment letters under separate cover.

O7-64

Please confirm receipt.

Thank you,

Everett DeLano  
*DeLano & DeLano*  
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April 29, 2024

Everett DeLano  
DeLano & DeLano  
104 W. Grand Avenue, Suite A  
Escondido, California 92025

**Subject: Comments on the Blueprint SD Initiative, Hillcrest Focused Plan Amendment, and University Community Plan Update (SCH No. 2021070359)**

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Dear Mr. DeLano,

We have reviewed the March 2024 Draft Program Environmental Impact Report (“DPEIR”) for the Blueprint SD Initiative, Hillcrest Focused Plan Amendment, and University Community Plan Update (“General Plan”) located in the City of San Diego (“City”). The General Plan proposes the Blueprint SD Initiative, a comprehensive amendment the General Plan, an amendment to the Uptown Community Plan as part of the Hilcrest Focused Plan Amendment, and an update to the University Community Plan.

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Our review concludes that the DPEIR fails to adequately evaluate the General Plan’s air quality, health risk, and greenhouse gas (“GHG”) impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed General Plan may be underestimated and inadequately addressed. A revised Environmental Impact Report (“EIR”) should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that projects included in the General Plan may have on the environment.

O7-66

## Air Quality

### Failure to Implement All Feasible Mitigation to Reduce Emissions

The DPEIR concludes that the General Plan would result in a significant construction-related air quality impact, stating:

O7-67

“Federal, State, and local regulations would provide a framework for developing project-level air quality protection measures for future projects and implementation of mitigation measure MM-AQ-1 would reduce construction-related air quality impacts for future development anticipated

under the project. Nevertheless, the ability of future development to reduce all impacts to less than significant after the analysis required by MM-AQ-1 is implemented cannot be guaranteed at a program level of review. Thus, impacts to air quality standards are considered to be significant” (p. 4.2-33).

The DPEIR continues and concludes that the General Plan would also result in a significant operational air quality impact, stating:

“[I]t is possible that for certain projects, adherence to the regulations may not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. Because operational emissions associated with development anticipated under the project would be greater for all pollutants when compared to adopted land uses and the assumptions used to develop the RAQS, and because it cannot be known whether certain projects would be able to reduce emissions below the significance thresholds, this impact would be significant” (p. 4.2-33).

Despite the implementation of Mitigation Measure (“MM”) AQ-1, the DPEIR determines that the air quality impacts associated with construction and operation of the proposed development under the General Plan would be significant. Specifically, MM AQ-1 states:

“Construction and operation of individual development projects shall not exceed criteria pollutant significance thresholds detailed in the latest City’s CEQA Significance Thresholds.

If an individual project is found to have the potential to exceed emission thresholds due to operational emissions, the following are example measures that could be implemented to reduce emissions to below a level of significance...” (p. 4.2-30 – 4.2-31).

MM AQ-1 requires future land use development projects to not exceed the City’s significance thresholds and provides examples of mitigation measures for projects that have significant emissions. However, the DPEIR should incorporate mitigation measures that are required of future projects in order to collectively reduce the emissions and impacts associated with the proposed development under the General Plan.

The California Office of Planning and Research (“OPR”) General Plan Guidelines and Technical Advisories provides guidance on the preparation and content of General Plans.<sup>1</sup> According to Chapter 10:

“The EIR must identify mitigation measures and alternatives to avoid or minimize potential impacts, to the extent feasible. The general plan EIR is a particularly useful tool for identifying measures to mitigate the cumulative effects of new development. For example, a general plan might anticipate a significant increase in industrial employment in the community. If this proposal would lead to increased automobile commuting, the EIR could identify measures to reduce peak-hour traffic volumes, such as new transit routes or improved bicycle facilities.

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<sup>1</sup> “General Plan Guidelines and Technical Advisories.” OPR, October 2023, *available at*: <https://opr.ca.gov/planning/general-plan/guidelines.html>.

Where other agencies are responsible for mitigating the effects of the general plan, they should be identified in the EIR. Pursuant to Public Resources Code section 21081.6, the general plan must incorporate the approved mitigation measures identified in the EIR into its policies and programs.”<sup>2</sup>

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General Plans must identify mitigation measures to avoid or minimize potential impacts. As such, we again reiterate that the DPEIR should have included mitigation measures that are required of all land use development projects, regardless of their future significance determination, in order to reduce the significant cumulative impacts found in the General Plan. Such MMs are suggested in the section of this letter titled “Feasible Mitigation Measures Available to Reduce Emissions.” The General Plan should not be approved until a revised EIR is prepared, incorporating all feasible mitigation to reduce collective emissions to the maximum extent feasible.

### Inadequate Mitigation Addressing Health Risk Impacts

In order to address the potential health risk impacts associated with the buildout of the General Plan, the DPEIR incorporates MM AQ-2, which states:

“Future development that involves heavy industrial land uses such as warehousing and distribution or other land uses that would involve substantial sources of mobile source diesel emissions shall be required to prepare a health risk assessment (HRA) in accordance with APCD HRA Guidelines and the OEHHA Air Toxics “Hot Spots” Program Risk Assessment Guidelines (APCD 2006; OEHHA 2022). The HRA shall include calculation of the excess cancer risk and the non-cancer chronic and acute health hazard index for the maximally exposed individual resident, and the maximally exposed individual worker. The HRA shall identify best available control technology required to reduce risk to less than 10 in 1,000,000” (p. 4.2-32).

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As demonstrated above, the General Plan requires that heavy industrial land uses prepare an operational mobile-source health risk assessment (“HRA”) through the incorporation of MM AQ-2. However, the DPEIR fails to include the requirement of construction-related HRAs in MM AQ-2. This is incorrect for three reasons.

First, by failing to require a quantified construction HRA, the DPEIR is inconsistent with CEQA’s requirement to make “a reasonable effort to substantively connect a project’s air quality impacts to likely health consequences.”<sup>3</sup> This poses a problem, as individual future projects under the General Plan will produce diesel particulate matter (“DPM”) emissions through the exhaust stacks of on-site heavy-duty construction equipment. However, the DPEIR fails to evaluate the potential toxic air contaminant (“TAC”) emissions generated from future projects or indicate the concentrations at which such pollutants would trigger adverse health effects. Without making a reasonable effort to connect the General Plan’s construction-related TAC emissions to the potential health risks posed to nearby

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<sup>2</sup> “General Plan Guidelines.” OPR, 2017, available at: <https://opr.ca.gov/planning/general-plan/guidelines.html>, chapter 10, p. 271.

<sup>3</sup> “Sierra Club v. County of Fresno.” Supreme Court of California, December 2018, available at: <https://ceqaportal.org/decisions/1907/Sierra%20Club%20v.%20County%20of%20Fresno.pdf>.

receptors, the DPEIR is inconsistent with CEQA's requirement to correlate the increase in emissions generated by future projects with the potential adverse impacts on human health.

Second, relevant to the industrial land uses within the proposed General Plan, the State of California Department of Justice ("DOJ") recommends that all warehouse projects prepare a quantitative HRA pursuant to the Office of Environmental Health Hazard Assessment ("OEHHA"), the organization responsible for providing guidance on conducting HRAs in California, as well as local air district guidelines.<sup>4</sup> OEHHA released its most recent *Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments* in February 2015. This guidance document describes the types of projects that warrant the preparation of an HRA. Specifically, OEHHA recommends that all short-term projects lasting at least 2 months assess cancer risks.<sup>5</sup> Furthermore, according to OEHHA:

"Exposure from projects lasting more than 6 months should be evaluated for the duration of the project. In all cases, for assessing risk to residential receptors, the exposure should be assumed to start in the third trimester to allow for the use of the ASFs (OEHHA, 2009)."<sup>6</sup>

As the construction duration of projects within the General Plan will likely exceed the 2-month and 6-month requirements set forth by OEHHA, construction of these projects meets the threshold warranting a quantified HRA under OEHHA guidance. These recommendations reflect the most recent state health risk policies, and a revised EIR should be prepared to require an analysis of health risk impacts posed to nearby sensitive receptors from DPM emissions generated during construction of industrial projects under the General Plan.

Third, while the DPEIR requires future industrial projects to evaluate the health risk impacts to nearby, existing receptors as a result of operation, the DPEIR fails to require the evaluation of the combined lifetime cancer risk as a result of construction and operation together. According to OEHHA guidance, "the excess cancer risk is calculated separately for each age grouping and then summed to yield cancer risk at the receptor location."<sup>7</sup> However, the DPEIR fails to require the summing of each age bin to evaluate the combined cancer risk of total construction and operations. This is incorrect, and a revised EIR should be prepared to revise MM AQ-2 and require the quantification and summing of construction and operational cancer risks together to compare to the San Diego County Air Pollution Control District ("SDAPCD") threshold of 10 in one million.<sup>8</sup>

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<sup>4</sup> "Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act." State of California Department of Justice, *available at*:

<https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/warehouse-best-practices.pdf>, p. 6.

<sup>5</sup> "Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at*: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>, p. 8-18.

<sup>6</sup> "Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments." OEHHA, February 2015, *available at*: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf>, p. 8-18.

<sup>7</sup> "Guidance Manual for preparation of Health Risk Assessments." OEHHA, February 2015, *available at*: <https://oehha.ca.gov/media/downloads/cnr/2015guidancemanual.pdf> p. 8-4

<sup>8</sup> "Supplemental Guidelines for Submission of Air Toxics "Hot Spots" Program Health Risk Assessments (HRAs)." SDAPCD, July 2022, *available at*:

<https://www.sdapcd.org/content/dam/sdapcd/documents/permits/air-toxics/Hot-Spots-Guidelines.pdf> p. 1

## Greenhouse Gas

### Failure to Require Consistency with the City's Climate Action Plan

The DPEIR concludes that the General Plan would result in less-than-significant GHG impacts, stating:

“Impacts related to GHG emissions and consistency with GHG policy would be less than significant; therefore, no mitigation would be required. However, as future development is implemented in accordance with the project, site-specific analysis for project consistency with the City’s General Plan and CAP policies would be required in addition to compliance with the CAP Consistency Regulations. Future project-level review would be required to ensure projects would be consistent with applicable plans and policies. Through required evaluation of policy and regulation consistency for future development, impacts related to GHG emissions would be less than significant” (p. 4.7-23).

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As demonstrated above, the DPEIR claims that future projects would be *required* to demonstrate consistency with the City’s Climate Action Plan (“CAP”). However, according to the City’s CAP:

“Projects that are consistent with the CAP as determined through the use of this Checklist may rely on the CAP for the cumulative impacts analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in this Checklist to the extent feasible.”<sup>9</sup>

Furthermore, while the CAP “provides a streamlined review process for proposed new development projects,” such projects are not inherently required to be consistent with the CAP and, rather, are able to conclude less-than-significant GHG impacts several different ways. Thus, the DPEIR should formally require all future projects under the General Plan to demonstrate consistency with the City’s CAP in a mitigation measure.

### Operational Greenhouse Gas Emission Calculations Indicate Significant Impacts

As described above, the DPEIR concludes that the General Plan would result in less-than-significant GHG impacts. In regard to impacts associated with GHG emissions, the DPEIR states:

“The project would support the City in obtaining citywide GHG emissions reduction targets under the CAP. Impacts related to GHG emissions would be less than significant” (p. 4.7-23).

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We found the DPEIR’s less-than-significant impact determination to be insufficient for several reasons. However, first and foremost, we quantitatively calculated the Project’s operational GHG emissions using the California Emissions Estimator Model (“CalEEMod”) Version 2022.1,<sup>10</sup> as well as Project-specific information provided by the DPEIR and associated documents.

<sup>9</sup> “CLIMATE ACTION PLAN CONSISTENCY CHECKLIST INTRODUCTION.” City of San Diego, February 2017, available at: [https://www.sandiego.gov/sites/default/files/city\\_of\\_san\\_diego\\_cap\\_checklist.pdf](https://www.sandiego.gov/sites/default/files/city_of_san_diego_cap_checklist.pdf).

<sup>10</sup> “CalEEMod Version 2022.1.” California Air Pollution Control Officers Association (CAPCOA), April 2022, available at: <https://www.caleemod.com/>.



CalEEMod provides recommended default values based on site-al information, such as land use type and size, meteorological data, and Project location. We modeled according to the land uses described in the Vehicle Miles Traveled Analysis (“VMT Analysis”), provided as Appendix J to the DPEIR, to provide a general calculation of the GHG emissions associated with the existing and proposed Blueprint SD Initiative land uses (see excerpt below) (Appendix J, Appendix B-1, Table 2, p. 4).

*Table 2 Dwelling Units and Retail Employment Summary by Model Run*

Model Run	Source	Single-family	Multi-family	Mobile home	Retail Employment	Total Dwelling Units
Model Run 1	LUDU22	288,146	260,067	4,872	N/A	553,085
	GP-14 2050	304,367	377,812	4,962	196,551	687,141
	<b>BP 2050</b>	<b>278,790</b>	<b>526,577</b>	<b>3,681</b>	<b>229,930</b>	<b>809,048</b>
Model Run 2	LUDU22	288,146	260,067	4,872	N/A	553,085
	GP-14 2050	304,367	377,812	4,962	196,551	687,141
	<b>BP 2050</b>	<b>273,388</b>	<b>589,850</b>	<b>2,742</b>	<b>243,908</b>	<b>865,980</b>
Model Run 3	LUDU22	288,146	260,067	4,872	N/A	553,085
	GP-14 2050	304,367	377,812	4,962	196,551	687,141
	<b>BP 2050</b>	<b>252,295</b>	<b>713,014</b>	<b>2,426</b>	<b>255,348</b>	<b>967,735</b>

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cont.

Specifically, we modeled the dwelling units associated with the Regional Land Use and Dwelling Unit Inventory for the year 2022 (“LUDU22”) to represent an existing scenario. We also modeled the dwelling units associated with the Blueprint SD Initiative Run 2 (“BP 2050 Run 2”) and Blueprint SD Initiative Run 3 (“BP 2050 Run 3”). Because of the size limit in CalEEMod, we prepared multiple models for each scenario – LUDU22, BP 2050 Run 2, and BP 2050 Run – which are provided in Appendix A to this comment letter and defined in the Table of Contents.

Our existing model included 2022 reported emission factors, while our proposed BP 2050 Run 2 and Run 3 models included 2050 forecasted emission factors. Thus, the GHG emissions calculated by the BP 2050 Run 2 and Run 3 models are underestimated, as the buildout of the Blueprint SD Initiative would take place over the next 25 years and, consequently, have higher emission factors than those forecasted for 2050. We additionally did not model construction, which would also increase GHG emissions estimates. All other values were left as default.

As demonstrated in Table 1, the single-family, multi-family, and mobile home dwelling units associated with LUDU22 would result in operational annual GHG emissions of 3,342,706-, 876,752-, and 37,126-metric tons of carbon dioxide equivalents per year (“MT CO<sub>2</sub>e/year”), respectively. In total, the existing land uses would result in operational annual GHG emissions of 4,256,584 MT CO<sub>2</sub>e/year.

**Table 1: Regional Land Use and Dwelling Unit Inventory (LUDU) for the Year 2022  
Annual Operational Greenhouse Gas Emissions (MT CO<sub>2</sub>e/year)**

Project Phase	Single-family	Multi-family	Mobile home	Total
<i>Mobile</i>	1,860,670	78,158	16,311	1,955,139
<i>Area</i>	438,570	395,833	7,415	841,818
<i>Energy</i>	872,170	314,708	11,748	1,198,626
<i>Waste</i>	111,130	27,722	519	139,371
<i>Water</i>	59,500	60,035	1,125	120,660
<i>Refrigeration</i>	666	296	8	970
<b>Annual Operational</b>	<b>3,342,706</b>	<b>876,752</b>	<b>37,126</b>	<b>4,256,584</b>

<sup>1</sup> The emission value provided in the model, “Blueprint SD Initiative Model 2 – Single Family Homes,” are multiplied by 10 to result in the indicated values. Due to the land use size limit in CalEEMod, we were only able to include 1/10 of the total dwelling units in our model.

As demonstrated in Table 2, the single-family, multi-family, and mobile home dwelling units associated with BP 2050 Run 2 would result in operational annual GHG emissions of 2,322,128-, 2,717,392-, and 15,997- MT CO<sub>2</sub>e/year, respectively. In total, the Blueprint SD Initiative Run 2 would result in operational annual GHG emissions of 5,055,427 MT CO<sub>2</sub>e/year.

**Table 2: Blueprint SD Initiative Run 2  
Annual Operational Greenhouse Gas Emissions (MT CO<sub>2</sub>e/year)**

Project Phase	Single-family <sup>1</sup>	Multi-family	Mobile home	Total
<i>Mobile</i>	1,261,080	1,265,624	6,558	2,533,262
<i>Area</i>	416,106	897,777	4,173	1,318,056
<i>Energy</i>	545,535	377,881	4,447	927,863
<i>Waste</i>	42,327	39,185	182	81,694
<i>Water</i>	56,448	136,164	633	193,245
<i>Refrigeration</i>	632	671	4	1,307
<b>Annual Operational</b>	<b>2,322,128</b>	<b>2,717,302</b>	<b>15,997</b>	<b>5,055,427</b>

<sup>1</sup> The emission values provided in the model, “Blueprint SD Initiative Model 2 – Single Family Homes,” are multiplied by 9 to result in the indicated values. Due to the land use size limit in CalEEMod, we were only able to include 1/9 of the total dwelling units in our model.

As demonstrated in Table 3, the single-family, multi-family, and mobile home dwelling units associated with BP 2050 Run 3 would result in operational annual GHG emissions of 2,142,979-, 3,284,692-, and 14,154- MT CO<sub>2</sub>e/year, respectively. In total, the Blueprint SD Initiative Run 3 would result in operational annual GHG emissions of 5,441,825 MT CO<sub>2</sub>e/year.

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**Table 3: Blueprint SD Initiative Run 3  
Annual Operational Greenhouse Gas Emissions (MT CO<sub>2</sub>e/year)**

Project Phase	Single-family <sup>1</sup>	Multi-family <sup>2</sup>	Mobile home	Total
<i>Mobile</i>	1,163,790	1,529,894	5,802	2,699,486
<i>Area</i>	384,003	1,085,238	3,692	1,472,933
<i>Energy</i>	503,451	456,784	3,935	964,170
<i>Waste</i>	39,060	47,368	161	86,589
<i>Water</i>	52,092	164,596	560	217,248
<i>Refrigeration</i>	583	812	4	1,399
<b>Annual Operational</b>	<b>2,142,979</b>	<b>3,284,692</b>	<b>14,154</b>	<b>5,441,825</b>

<sup>1</sup> The emission values provided in the model, “Blueprint SD Initiative Model 3 – Single Family Homes,” are multiplied by 9 to result in the indicated values. Due to the land use size limit in CalEEMod, we were only able to include ⅓ of the total dwelling units in our model.

<sup>2</sup> The emission values provided in the model, “Blueprint SD Initiative Model 3 – Multi Family Residential,” are multiplied by 2 to result in the indicated values. Due to the land use size limit in CalEEMod, we were only able to include ½ of the total dwelling units in our model.

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After accounting for existing emissions, the Blueprint SD Initiative Run 2 and Run 3 would result in *net* annual operational GHG emissions of 798,843- and 1,185,241-MT CO<sub>2</sub>e/year, respectively, which we again emphasize is likely an underestimate of potential GHG emissions.<sup>11, 12</sup>

Next, we modeled the Hillcrest Focused Plan Amendment (“Hillcrest FPA”) and University Community Plan Update (“University CPU”) according to the residential and non-residential land uses described in the DPEIR (p. 3-27, Table 3-1, Table 3-2; p. 3-50 – 3-51, Table 3-4, Table 3-5).<sup>13</sup> These models also accounted for 2050 forecasted emission factors and, thus, are naturally underestimated. All other values were left as default.

As demonstrated in Table 4, the Hillcrest FPA and University CPU would result in net operational annual GHG emissions of 211,320- and 686,154-MT CO<sub>2</sub>e/year.

<sup>11</sup> Run 3 (5,441,825 MT CO<sub>2</sub>e/year) – Existing (4,256,584 MT CO<sub>2</sub>e/year) = Net (1,185,241 MT CO<sub>2</sub>e/year)

<sup>12</sup> Run 3 (5,055,427 MT CO<sub>2</sub>e/year) – Existing (4,256,584 MT CO<sub>2</sub>e/year) = Net (798,843 MT CO<sub>2</sub>e/year)

<sup>13</sup> We used the land uses in the “Change from Existing” column in the above-mentioned tables.

**Table 4: Hillcrest FPA and University CPU Change from Existing Uses  
Annual Operational Greenhouse Gas Emissions (MT CO<sub>2</sub>e/year)**

Project Phase	Hillcrest FPA	University CPU
<i>Mobile</i>	131,038	468,697
<i>Area</i>	45,137	47,006
<i>Energy</i>	22,849	132,084
<i>Waste</i>	2,363	16,564
<i>Water</i>	9,894	21,037
<i>Refrigeration</i>	39	766
<b>Annual Operational</b>	<b>211,320</b>	<b>686,154</b>

As demonstrated in Table 1 through 4 above, we found that the General Plan would result in substantial GHG emissions, potentially exceeding 1,000,000 MT CO<sub>2</sub>e/year in 2050. This poses a problem for three reasons.

First, CEQA requires that EIRs conduct a good-faith effort at fully disclosing environmental impacts, stating:

“CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure.”<sup>14</sup>

By failing to quantitatively calculate the GHG emissions associated with the General Plan, the DPEIR did not make a good-faith effort at full disclosure. While projects are able to rely on the City’s CAP to evaluate GHG impacts, the size and scale of the General Plan warrants an exhaustive analysis of the associated GHG emissions.

Second, the City’s CAP establishes a community-wide goal of net zero carbon emissions by 2035.<sup>15</sup> Thus, even by 2050, the General Plan would not be consistent with this goal and the DPEIR’s claim that “[t]he project would support the City in obtaining citywide GHG emissions reduction targets under the CAP” is inaccurate. As a result, the General Plan would result in a potentially significant GHG impact that should be mitigated.

Third, it is clear that buildout of the General Plan would, on a cumulative basis, contribute to the significant adverse environmental impacts of global climate change. As a result, we find that the DPEIR’s

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<sup>14</sup> “2024 CEQA Statute & Guidelines.” Association of Environmental Professionals, *available at*: [https://www.califaep.org/statute\\_and\\_guidelines.php](https://www.califaep.org/statute_and_guidelines.php), p. 174.

<sup>15</sup> “Climate Action Plan.” City of San Diego, *available at*: <https://www.sandiego.gov/sustainability-mobility/climate-action/cap#:~:text=The%202022%20CAP%20establishes%20a,our%20overall%20quality%20of%20life.>

claim that the General Plan would result in a less-than-significant cumulative GHG impact to be incorrect (p. 4.7-22).

In conclusion, the General Plan would result in a potentially significant GHG impact not previously identified or addressed by the DPEIR. A revised EIR should be prepared to include an updated GHG analysis that incorporates mitigation measures to reduce the GHG emissions associated with future projects under the General Plan to the maximum extent feasible.

## Mitigation

### Feasible Mitigation Measures Available to Reduce Emissions

Our analysis demonstrates that the Project would result in potentially significant air quality, health risk, and GHG impacts that should be mitigated further. In an effort to reduce the Project’s emissions, we identified several mitigation measures that are applicable to the proposed Project. To reduce the Project’s emissions, we recommend consideration of SCAG’s 2020 RTP/SCS PEIR’s Air Quality Project Level Mitigation Measures (“PMM-AQ-1”) and Greenhouse Gas Project Level Mitigation Measures (“PMM-GHG-1”), as described below:<sup>16</sup>

<b>SCAG RTP/SCS 2020-2045</b>
<b>Air Quality Project Level Mitigation Measures – PMM-AQ-1:</b>
In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the <i>State CEQA Guidelines</i> , a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:
a) Minimize land disturbance.
b) Suspend grading and earth moving when wind gusts exceed 25 miles per hour unless the soil is wet enough to prevent dust plumes.
c) Cover trucks when hauling dirt.
d) Stabilize the surface of dirt piles if not removed immediately.
e) Limit vehicular paths on unpaved surfaces and stabilize any temporary roads.
f) Minimize unnecessary vehicular and machinery activities.
g) Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
h) Revegetate disturbed land, including vehicular paths created during construction to avoid future off-road vehicular activities.
i) On Caltrans projects, Caltrans Standard Specifications 10-Dust Control, 17-Watering, and 18-Dust Palliative shall be incorporated into project specifications.

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<sup>16</sup> “4.0 Mitigation Measures.” Connect SoCal Program Environmental Impact Report Addendum #1, September 2020, available at: [https://scag.ca.gov/sites/main/files/file-attachments/fpeir\\_connectsocial\\_addendum\\_4\\_mitigationmeasures.pdf?1606004420](https://scag.ca.gov/sites/main/files/file-attachments/fpeir_connectsocial_addendum_4_mitigationmeasures.pdf?1606004420), p. 4.0-2 – 4.0-10; 4.0-19 – 4.0-23; See also: “Certified Final Connect SoCal Program Environmental Impact Report.” Southern California Association of Governments (SCAG), May 2020, available at: <https://scag.ca.gov/peir>.



j) Require contractors to assemble a comprehensive inventory list (i.e., make, model, engine year, horsepower, emission rates) of all heavy-duty off-road (portable and mobile) equipment (50 horsepower and greater) that could be used an aggregate of 40 or more hours for the construction project. Prepare a plan for approval by the applicable air district demonstrating achievement of the applicable percent reduction for a CARB-approved fleet.
k) Ensure that all construction equipment is properly tuned and maintained.
l) Minimize idling time to 5 minutes—saves fuel and reduces emissions.
m) Provide an operational water truck on-site at all times. Use watering trucks to minimize dust; watering should be sufficient to confine dust plumes to the project work areas. Sweep paved streets at least once per day where there is evidence of dirt that has been carried on to the roadway.
n) Utilize existing power sources (e.g., power poles) or clean fuel generators rather than temporary power generators.
o) Develop a traffic plan to minimize traffic flow interference from construction activities. The plan may include advance public notice of routing, use of public transportation, and satellite parking areas with a shuttle service. Schedule operations affecting traffic for off-peak hours. Minimize obstruction of through-traffic lanes. Provide a flag person to guide traffic properly and ensure safety at construction sites.
p) As appropriate require that portable engines and portable engine-driven equipment units used at the project work site, with the exception of on-road and off-road motor vehicles, obtain CARB Portable Equipment Registration with the state or a local district permit. Arrange appropriate consultations with the CARB or the District to determine registration and permitting requirements prior to equipment operation at the site.
q) Require projects within 500 feet of residences, hospitals, or schools to use Tier 4 equipment for all engines above 50 horsepower (hp) unless the individual project can demonstrate that Tier 4 engines would not be required to mitigate emissions below significance thresholds.
r) Projects located within the South Coast Air Basin should consider applying for South Coast AQMD “SOON” funds which provides funds to applicable fleets for the purchase of commercially available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles.
s) Projects located within AB 617 communities should review the applicable Community Emissions Reduction Plan (CERP) for additional mitigation that can be applied to individual projects.
t) Where applicable, projects should provide information about air quality related programs to schools, including the Environmental Justice Community Partnerships (EJCP), Clean Air Ranger Education (CARE), and Why Air Quality Matters programs.
u) Projects should work with local cities and counties to install adequate signage that prohibits truck idling in certain locations (e.g., near schools and sensitive receptors).
v) As applicable for airport projects, the following measures should be considered...
w) As applicable for port projects, the following measures should be considered: <ul style="list-style-type: none"> <li>- Develop specific timelines for transitioning to zero emission cargo handling equipment (CHE)</li> <li>- Develop interim performance standards with a minimum amount of CHE replacement each year to ensure adequate progress.</li> <li>- Use short side electric power for ships, which may include tugboats and other ocean-going vessels or develop incentives to gradually ramp up the usage of shore power.</li> <li>- Install the appropriate infrastructure to provide shore power to operate the ships. Electrical hookups should be appropriately sized.</li> <li>- Maximize participation in the Port of Los Angeles’ Vessel Speed Reduction Program or the Port of Long Beach’s Green Flag Initiation Program in order to reduce the speed of vessel transiting within 40 nautical miles of Point Fermin.</li> <li>- Encourage the participation in the Green Ship Incentives.</li> <li>- Offer incentives to encourage the use of on-dock rail.</li> </ul>
x) As applicable for rail projects, the following measures should be considered...

O7-7  
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y) Projects that will introduce sensitive receptors within 500 feet of freeways and other sources should consider installing high efficiency of enhanced filtration units, such as Minimum Efficiency Reporting Value (MERV) 13 or better. Installation of enhanced filtration units can be verified during occupancy inspection prior to the issuance of an occupancy permit.

z) Develop an ongoing monitoring, inspection, and maintenance program for the MERV filters.

aa) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities.

bb) The following criteria related to diesel emissions shall be implemented on by individual project sponsors as appropriate and feasible:

- Diesel nonroad vehicles on site for more than 10 total days shall have either (1) engines that meet EPA on road emissions standards or (2) emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%
- Diesel generators on site for more than 10 total days shall be equipped with emission control technology verified by EPA or CARB to reduce PM emissions by a minimum of 85%.
- Nonroad diesel engines on site shall be Tier 2 or higher.
- Diesel nonroad construction equipment on site for more than 10 total days shall have either (1) engines meeting EPA Tier 4 nonroad emissions standards or (2) emission control technology verified by EPA or CARB for use with nonroad engines to reduce PM emissions by a minimum of 85% for engines for 50 hp and greater and by a minimum of 20% for engines less than 50 hp.
- Emission control technology shall be operated, maintained, and serviced as recommended by the emission control technology manufacturer.
- Diesel vehicles, construction equipment, and generators on site shall be fueled with ultra-low sulfur diesel fuel (ULSD) or a biodiesel blend approved by the original engine manufacturer with sulfur content of 15 ppm or less.
- The construction contractor shall maintain a list of all diesel vehicles, construction equipment, and generators to be used on site. The list shall include the following:
  - i. Contractor and subcontractor name and address, plus contact person responsible for the vehicles or equipment.
  - ii. Equipment type, equipment manufacturer, equipment serial number, engine manufacturer, engine model year, engine certification (Tier rating), horsepower, engine serial number, and expected fuel usage and hours of operation.
  - iii. For the emission control technology installed: technology type, serial number, make, model, manufacturer, EPA/CARB verification number/level, and installation date and hour-meter reading on installation date.
- The contractor shall establish generator sites and truck-staging zones for vehicles waiting to load or unload material on site. Such zones shall be located where diesel emissions have the least impact on abutters, the general public, and especially sensitive receptors such as hospitals, schools, daycare facilities, elderly housing, and convalescent facilities.
- The contractor shall maintain a monthly report that, for each on road diesel vehicle, nonroad construction equipment, or generator onsite, includes:
  - i. Hour-meter readings on arrival on-site, the first and last day of every month, and on off-site date.
  - ii. Any problems with the equipment or emission controls.
  - iii. Certified copies of fuel deliveries for the time period that identify:
    - 1. Source of supply
    - 2. Quantity of fuel
    - 3. Quantity of fuel, including sulfur content (percent by weight)

cc) Project should exceed Title-24 Building Envelope Energy Efficiency Standards (California Building Standards Code). The following measures can be used to increase energy efficiency:

- Provide pedestrian network improvements, such as interconnected street network, narrower roadways and shorter block lengths, sidewalks, accessibility to transit and transit shelters, traffic calming measures, parks and public spaces, minimize pedestrian barriers.

O7-70  
cont.

- Provide traffic calming measures, such as:
  - i. Marked crosswalks
  - ii. Count-down signal timers
  - iii. Curb extensions
  - iv. Speed tables
  - v. Raised crosswalks
  - vi. Raised intersections
  - vii. Median islands
  - viii. Tight corner radii
  - ix. Roundabouts or mini-circles
  - x. On-street parking
  - xi. Chicanes/chokers
- Create urban non-motorized zones
- Provide bike parking in non-residential and multi-unit residential projects
- Dedicate land for bike trails
- Limit parking supply through:
  - i. Elimination (or reduction) of minimum parking requirements
  - ii. Creation of maximum parking requirements
  - iii. Provision of shared parking
- Require residential area parking permit.
- Provide ride-sharing programs
  - i. Designate a certain percentage of parking spacing for ride sharing vehicles
  - ii. Designating adequate passenger loading and unloading and waiting areas for ride-sharing vehicles
  - iii. Providing a web site or messaging board for coordinating rides
  - iv. Permanent transportation management association membership and finding requirement.

O7-70  
cont.

**Greenhouse Gas Project Level Mitigation Measures – PMM-GHG-1**

In accordance with provisions of sections 15091(a)(2) and 15126.4(a)(1)(B) of the *State CEQA Guidelines*, a Lead Agency for a project can and should consider mitigation measures to reduce substantial adverse effects related to violating air quality standards. Such measures may include the following or other comparable measures identified by the Lead Agency:

- b) Reduce emissions resulting from projects through implementation of project features, project design, or other measures, such as those described in Appendix F of the State CEQA Guidelines.
- c) Include off-site measures to mitigate a project’s emissions.
- d) Measures that consider incorporation of Best Available Control Technology (BACT) during design, construction and operation of projects to minimize GHG emissions, including but not limited to:
  - i. Use energy and fuel-efficient vehicles and equipment;
  - ii. Deployment of zero- and/or near zero emission technologies;
  - iii. Use lighting systems that are energy efficient, such as LED technology;
  - iv. Use the minimum feasible amount of GHG-emitting construction materials;
  - v. Use cement blended with the maximum feasible amount of flash or other materials that reduce GHG emissions from cement production;
  - vi. Incorporate design measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse;
  - vii. Incorporate design measures to reduce energy consumption and increase use of renewable energy;
  - viii. Incorporate design measures to reduce water consumption;
  - ix. Use lighter-colored pavement where feasible;
  - x. Recycle construction debris to maximum extent feasible;

<ul style="list-style-type: none"> <li>xi. Plant shade trees in or near construction projects where feasible; and</li> <li>xii. Solicit bids that include concepts listed above.</li> </ul>
<p>e) Measures that encourage transit use, carpooling, bike-share and car-share programs, active transportation, and parking strategies, including, but not limited to the following:</p> <ul style="list-style-type: none"> <li>i. Promote transit-active transportation coordinated strategies;</li> <li>ii. Increase bicycle carrying capacity on transit and rail vehicles;</li> <li>iii. Improve or increase access to transit;</li> <li>iv. Increase access to common goods and services, such as groceries, schools, and day care;</li> <li>v. Incorporate affordable housing into the project;</li> <li>vi. Incorporate the neighborhood electric vehicle network;</li> <li>vii. Orient the project toward transit, bicycle and pedestrian facilities;</li> <li>viii. Improve pedestrian or bicycle networks, or transit service;</li> <li>ix. Provide traffic calming measures;</li> <li>x. Provide bicycle parking;</li> <li>xi. Limit or eliminate park supply;</li> <li>xii. Unbundle parking costs;</li> <li>xiii. Provide parking cash-out programs;</li> <li>xiv. Implement or provide access to commute reduction program;</li> </ul>
<p>f) Incorporate bicycle and pedestrian facilities into project designs, maintaining these facilities, and providing amenities incentivizing their use; and planning for and building local bicycle projects that connect with the regional network;</p>
<p>g) Improving transit access to rail and bus routes by incentives for construction and transit facilities within developments, and/or providing dedicated shuttle service to transit stations; and</p>
<p>h) Adopting employer trip reduction measures to reduce employee trips such as vanpool and carpool programs, providing end-of-trip facilities, and telecommuting programs including but not limited to measures that:</p> <ul style="list-style-type: none"> <li>i. Provide car-sharing, bike sharing, and ride-sharing programs;</li> <li>ii. Provide transit passes;</li> <li>iii. Shift single occupancy vehicle trips to carpooling or vanpooling, for example providing ride-matching services;</li> <li>iv. Provide incentives or subsidies that increase that use of modes other than single-occupancy vehicle;</li> <li>v. Provide on-site amenities at places of work, such as priority parking for carpools and vanpools, secure bike parking, and showers and locker rooms;</li> <li>vi. Provide employee transportation coordinators at employment sites;</li> <li>vii. Provide a guaranteed ride home service to users of non-auto modes.</li> </ul>
<p>i) Designate a percentage of parking spaces for ride-sharing vehicles or high-occupancy vehicles, and provide adequate passenger loading and unloading for those vehicles;</p>
<p>j) Land use siting and design measures that reduce GHG emissions, including:</p> <ul style="list-style-type: none"> <li>i. Developing on infill and brownfields sites;</li> <li>ii. Building compact and mixed-use developments near transit;</li> <li>iii. Retaining on-site mature trees and vegetation, and planting new canopy trees;</li> <li>iv. Measures that increase vehicle efficiency, encourage use of zero and low emissions vehicles, or reduce the carbon content of fuels, including constructing or encouraging construction of electric vehicle charging stations or neighborhood electric vehicle networks, or charging for electric bicycles; and</li> </ul>

O7-70  
cont.

v. Measures to reduce GHG emissions from solid waste management through encouraging solid waste recycling and reuse.
k) Consult the SCAG Environmental Justice Toolbox for potential measures to address impacts to low-income and/or minority communities. The measures provided above are also intended to be applied in low income and minority communities as applicable and feasible.
l) Require at least five percent of all vehicle parking spaces include electric vehicle charging stations, or at a minimum, require the appropriate infrastructure to facilitate sufficient electric charging for passenger vehicles and trucks to plug-in.
m) Encourage telecommuting and alternative work schedules, such as: <ul style="list-style-type: none"> <li>i. Staggered starting times</li> <li>ii. Flexible schedules</li> <li>iii. Compressed work weeks</li> </ul>
n) Implement commute trip reduction marketing, such as: <ul style="list-style-type: none"> <li>i. New employee orientation of trip reduction and alternative mode options</li> <li>ii. Event promotions</li> <li>iii. Publications</li> </ul>
o) Implement preferential parking permit program
p) Implement school pool and bus programs
q) Price workplace parking, such as: <ul style="list-style-type: none"> <li>i. Explicitly charging for parking for its employees;</li> <li>ii. Implementing above market rate pricing;</li> <li>iii. Validating parking only for invited guests;</li> <li>iv. Not providing employee parking and transportation allowances; and</li> <li>v. Educating employees about available alternatives.</li> </ul>

O7-70  
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These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the future projects, which subsequently, reduce the cumulative emissions under the General Plan. A revised EIR should be prepared to include all feasible mitigation measures, as well as include updated air quality, health risk, and GHG analyses to ensure that the necessary mitigation measures are implemented to reduce emissions to the maximum extent possible.

## Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

O7-71



Sincerely,



Matt Hagemann, P.G., C.Hg.



Paul E. Rosenfeld, Ph.D.

Appendix A: CalEEMod Output Files

07-72

# Appendix A

## Table of Contents:

### Blueprint SD Initiative Model 2 (BP 2050 Run 2)

1. Blueprint SD Initiative Model 2 – Single Family Homes Custom Report
2. Blueprint SD Initiative Model 2 – Multi Family Residential Custom Report
3. Blueprint SD Initiative Model 2 – Mobile Homes Custom Report

### Blueprint SD Initiative Model 3 (BP 2050 Run 3)

4. Blueprint SD Initiative Model 3 – Single Family Homes Custom Report
5. Blueprint SD Initiative Model 3 – Multi Family Residential Custom Report
6. Blueprint SD Initiative Model 3 – Mobile Homes Custom Report

### Regional Land Use and Dwelling Unit Inventory for the Year 2022 (LUDU22)

7. LUDU22 - Single Family Homes Custom Report
8. LUDU22 - Multi Family Residential Custom Report
9. LUDU22 - Mobile Homes Custom Report

### Hillcrest FPA and University CPU

10. Hillcrest FPA - Change From Existing Uses Custom Report
11. University CPU - Change From Existing Uses Custom Report

# Blueprint SD Initiative Model 2 - Single Family Homes Custom Report

## Table of Contents

- 1. Basic Project Information
  - 1.1. Basic Project Information
  - 1.2. Land Use Types
  - 1.3. User-Selected Emission Reduction Measures by Emissions Sector
- 2. Emissions Summary
  - 2.4. Operations Emissions Compared Against Thresholds
  - 2.5. Operations Emissions by Sector, Unmitigated
- 4. Operations Emissions Details
  - 4.1. Mobile Emissions by Land Use
    - 4.1.1. Unmitigated
  - 4.2. Energy
    - 4.2.1. Electricity Emissions By Land Use - Unmitigated
    - 4.2.3. Natural Gas Emissions By Land Use - Unmitigated
  - 4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

#### 5.10.2. Architectural Coatings

#### 5.10.3. Landscape Equipment

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

### 5.15. Operational Off-Road Equipment



5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Blueprint SD Initiative Model 2 - Single Family Homes
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	30,376	Dwelling Unit	9,862	59,233,980	355,794,430	—	84,750	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	48,008	48,536	1,409	62,456	114	7,928	943	8,872	7,891	239	8,130	856,479	1,627,199	2,483,678	2,151	105	522	2,569,256
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	47,851	48,387	1,421	60,616	114	7,927	943	8,871	7,891	239	8,130	856,479	1,582,862	2,439,341	2,153	107	427	2,525,556
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	11,265	12,408	712	16,890	33.0	1,798	915	2,713	1,789	232	2,021	202,396	1,299,287	1,501,683	1,548	59.0	465	1,558,427
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2,056	2,265	130	3,082	6.02	328	167	495	327	42.3	369	33,509	215,112	248,621	256	9.76	77.1	258,015

### 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Blueprint SD Initiative Model 2 - Single Family Homes Custom Report, 4/25/2024

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	565	533	267	3,247	8.72	3.62	943	947	3.38	239	243	—	887,088	887,088	35.2	36.4	97.7	898,914	
Area	47,418	47,991	924	59,116	104	7,907	—	7,907	7,870	—	7,870	843,605	356,389	1,199,994	779	60.6	—	1,237,507	
Energy	25.6	12.8	219	93.1	1.40	17.7	—	17.7	17.7	—	17.7	—	364,318	364,318	41.4	2.57	—	366,119	
Water	—	—	—	—	—	—	—	—	—	—	—	2,045	19,404	21,449	213	5.44	—	28,407	
Waste	—	—	—	—	—	—	—	—	—	—	—	10,828	0.00	10,828	1,082	0.00	—	37,885	
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	424	424	
Total	48,008	48,536	1,409	62,456	114	7,928	943	8,872	7,891	239	8,130	856,479	1,627,199	2,483,678	2,151	105	522	2,569,256	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Mobile	566	533	295	3,139	8.33	3.62	943	947	3.38	239	243	—	847,359	847,359	37.8	38.7	2.53	859,837	
Area	47,260	47,841	908	57,384	104	7,906	—	7,906	7,870	—	7,870	843,605	351,781	1,195,386	778	60.5	—	1,232,884	
Energy	25.6	12.8	219	93.1	1.40	17.7	—	17.7	17.7	—	17.7	—	364,318	364,318	41.4	2.57	—	366,119	
Water	—	—	—	—	—	—	—	—	—	—	—	2,045	19,404	21,449	213	5.44	—	28,407	
Waste	—	—	—	—	—	—	—	—	—	—	—	10,828	0.00	10,828	1,082	0.00	—	37,885	
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	424	424	
Total	47,851	48,387	1,421	60,616	114	7,927	943	8,871	7,891	239	8,130	856,479	1,582,862	2,439,341	2,153	107	427	2,525,556	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Mobile	544	512	282	3,051	8.20	3.54	915	918	3.31	232	235	—	834,262	834,262	36.2	37.3	41.2	846,335	
Area	10,695	11,883	212	13,746	23.4	1,777	—	1,777	1,768	—	1,768	189,522	81,303	270,825	175	13.6	—	279,257	
Energy	25.6	12.8	219	93.1	1.40	17.7	—	17.7	17.7	—	17.7	—	364,318	364,318	41.4	2.57	—	366,119	
Water	—	—	—	—	—	—	—	—	—	—	—	2,045	19,404	21,449	213	5.44	—	28,407	
Waste	—	—	—	—	—	—	—	—	—	—	—	10,828	0.00	10,828	1,082	0.00	—	37,885	

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	424	424
Total	11,265	12,408	712	16,890	33.0	1,798	915	2,713	1,789	232	2,021	202,396	1,299,287	1,501,683	1,548	59.0	465	1,558,427
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	99.3	93.5	51.4	557	1.50	0.65	167	168	0.60	42.3	42.9	—	138,122	138,122	6.00	6.18	6.83	140,120
Area	1,952	2,169	38.7	2,509	4.27	324	—	324	323	—	323	31,378	13,461	44,838	29.0	2.25	—	46,234
Energy	4.67	2.34	39.9	17.0	0.25	3.23	—	3.23	3.23	—	3.23	—	60,317	60,317	6.86	0.43	—	60,615
Water	—	—	—	—	—	—	—	—	—	—	—	339	3,213	3,551	35.3	0.90	—	4,703
Waste	—	—	—	—	—	—	—	—	—	—	—	1,793	0.00	1,793	179	0.00	—	6,272
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	70.2	70.2
Total	2,056	2,265	130	3,082	6.02	328	167	495	327	42.3	369	33,509	215,112	248,621	256	9.76	77.1	258,015

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	565	533	267	3,247	8.72	3.62	943	947	3.38	239	243	—	887,088	887,088	35.2	36.4	97.7	898,914
Total	565	533	267	3,247	8.72	3.62	943	947	3.38	239	243	—	887,088	887,088	35.2	36.4	97.7	898,914
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Single Family Housing	566	533	295	3,139	8.33	3.62	943	947	3.38	239	243	—	847,359	847,359	37.8	38.7	2.53	859,837
Total	566	533	295	3,139	8.33	3.62	943	947	3.38	239	243	—	847,359	847,359	37.8	38.7	2.53	859,837
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	99.3	93.5	51.4	557	1.50	0.65	167	168	0.60	42.3	42.9	—	138,122	138,122	6.00	6.18	6.83	140,120
Total	99.3	93.5	51.4	557	1.50	0.65	167	168	0.60	42.3	42.9	—	138,122	138,122	6.00	6.18	6.83	140,120

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	86,700	86,700	16.9	2.04	—	87,731
Total	—	—	—	—	—	—	—	—	—	—	—	—	86,700	86,700	16.9	2.04	—	87,731
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	86,700	86,700	16.9	2.04	—	87,731
Total	—	—	—	—	—	—	—	—	—	—	—	—	86,700	86,700	16.9	2.04	—	87,731
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	14,354	14,354	2.79	0.34	—	14,525
Total	—	—	—	—	—	—	—	—	—	—	—	—	14,354	14,354	2.79	0.34	—	14,525

### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	25.6	12.8	219	93.1	1.40	17.7	—	17.7	17.7	—	17.7	—	277,618	277,618	24.6	0.52	—	278,388
Total	25.6	12.8	219	93.1	1.40	17.7	—	17.7	17.7	—	17.7	—	277,618	277,618	24.6	0.52	—	278,388
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	25.6	12.8	219	93.1	1.40	17.7	—	17.7	17.7	—	17.7	—	277,618	277,618	24.6	0.52	—	278,388
Total	25.6	12.8	219	93.1	1.40	17.7	—	17.7	17.7	—	17.7	—	277,618	277,618	24.6	0.52	—	278,388
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	4.67	2.34	39.9	17.0	0.25	3.23	—	3.23	3.23	—	3.23	—	45,963	45,963	4.07	0.09	—	46,090
Total	4.67	2.34	39.9	17.0	0.25	3.23	—	3.23	3.23	—	3.23	—	45,963	45,963	4.07	0.09	—	46,090

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	47,260	46,472	908	57,384	104	7,906	—	7,906	7,870	—	7,870	843,605	351,781	1,195,386	778	60.5	—	1,232,884
Consumer Products	—	1,268	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	102	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	158	150	15.9	1,732	0.07	0.77	—	0.77	0.58	—	0.58	—	4,608	4,608	0.19	0.04	—	4,624
Total	47,418	47,991	924	59,116	104	7,907	—	7,907	7,870	—	7,870	843,605	356,389	1,199,994	779	60.6	—	1,237,507
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	47,260	46,472	908	57,384	104	7,906	—	7,906	7,870	—	7,870	843,605	351,781	1,195,386	778	60.5	—	1,232,884
Consumer Products	—	1,268	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	102	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	47,260	47,841	908	57,384	104	7,906	—	7,906	7,870	—	7,870	843,605	351,781	1,195,386	778	60.5	—	1,232,884
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1,938	1,905	37.2	2,353	4.26	324	—	324	323	—	323	31,378	13,084	44,462	29.0	2.25	—	45,857

Consumer	—	231	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	18.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	14.2	13.5	1.43	156	0.01	0.07	—	0.07	0.05	—	0.05	—	376	376	0.02	< 0.005	—	378
Total	1,952	2,169	38.7	2,509	4.27	324	—	324	323	—	323	31,378	13,461	44,838	29.0	2.25	—	46,234

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	2,045	19,404	21,449	213	5.44	—	28,407
Total	—	—	—	—	—	—	—	—	—	—	—	2,045	19,404	21,449	213	5.44	—	28,407
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	2,045	19,404	21,449	213	5.44	—	28,407
Total	—	—	—	—	—	—	—	—	—	—	—	2,045	19,404	21,449	213	5.44	—	28,407
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	339	3,213	3,551	35.3	0.90	—	4,703
Total	—	—	—	—	—	—	—	—	—	—	—	339	3,213	3,551	35.3	0.90	—	4,703

#### 4.5. Waste Emissions by Land Use

##### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	10,828	0.00	10,828	1,082	0.00	—	37,885
Total	—	—	—	—	—	—	—	—	—	—	—	10,828	0.00	10,828	1,082	0.00	—	37,885
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	10,828	0.00	10,828	1,082	0.00	—	37,885
Total	—	—	—	—	—	—	—	—	—	—	—	10,828	0.00	10,828	1,082	0.00	—	37,885
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,793	0.00	1,793	179	0.00	—	6,272
Total	—	—	—	—	—	—	—	—	—	—	—	1,793	0.00	1,793	179	0.00	—	6,272

#### 4.6. Refrigerant Emissions by Land Use



4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	424	424
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	424	424
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	424	424
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	424	424
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	70.2	70.2
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	70.2	70.2

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.8. Stationary Emissions By Equipment Type

##### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
-------	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated



Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	286,753	289,791	259,718	103,413,630	1,323,989	1,338,014	1,199,164	477,478,553

## 5.10. Operational Area Sources

### 5.10.1. Hearths

#### 5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	10632
Gas Fireplaces	16707
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	3038
Conventional Wood Stoves	0
Catalytic Wood Stoves	1519
Non-Catalytic Wood Stoves	1519
Pellet Wood Stoves	0

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
119948809.5	39,982,937	0.00	0.00	—

### 5.10.3. Landscape Equipment

Season	Unit	Value
--------	------	-------

Snow Days	day/yr	0.00
Summer Days	day/yr	180

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

#### Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	186,549,904	170	0.0330	0.0040	866,241,771

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	1,067,216,339	6,498,616,902

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	20,092	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
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Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

### 5.15. Operational Off-Road Equipment

#### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------

### 5.16. Stationary Sources

#### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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#### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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### 5.17. User Defined

Equipment Type	Fuel Type
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### 5.18. Vegetation

#### 5.18.1. Land Use Change

##### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 8. User Changes to Default Data

Screen	Justification
Construction: Construction Phases	Construction not included.
Construction: Off-Road Equipment	Construction not included.

# Blueprint SD Initiative Model 2 - Multi Family Residential Custom Report

## Table of Contents

### 1. Basic Project Information

#### 1.1. Basic Project Information

#### 1.2. Land Use Types

#### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

#### 2.4. Operations Emissions Compared Against Thresholds

#### 2.5. Operations Emissions by Sector, Unmitigated

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

#### 4.2. Energy

##### 4.2.1. Electricity Emissions By Land Use - Unmitigated

##### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

#### 4.3. Area Emissions by Source



4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

#### 5.10.2. Architectural Coatings

#### 5.10.3. Landscape Equipment

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

### 5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Blueprint SD Initiative Model 2 - Multi Family Residential
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments High Rise	589,850	Dwelling Unit	9,514	566,256,000	0.00	—	1,645,681	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	926,091	923,358	21,450	1,178,309	2,107	153,653	8,699	162,352	152,941	2,205	155,146	16,655,937	17,432,998	34,088,935	43,321	1,635	4,956	35,664,001
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	923,029	920,454	21,401	1,143,677	2,102	153,638	8,699	162,337	152,930	2,205	155,135	16,655,937	16,977,200	33,633,137	43,341	1,655	4,079	35,213,909
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	212,719	221,941	7,711	294,927	535	34,614	8,264	42,878	34,451	2,095	36,546	3,954,932	11,447,350	15,402,282	31,603	724	4,428	16,412,648
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	38,821	40,504	1,407	53,824	97.6	6,317	1,508	7,825	6,287	382	6,670	654,784	1,895,239	2,550,024	5,232	120	733	2,717,301

### 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Blueprint SD Initiative Model 2 - Multi Family Residential Custom Report, 4/25/2024

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5,210	4,912	2,458	29,938	80.4	33.3	8,699	8,733	31.2	2,205	2,236	—	8,179,409	8,179,409	324	336	901	8,288,447
Area	920,758	918,384	17,938	1,147,923	2,020	153,534	—	153,534	152,825	—	152,825	16,381,155	6,920,370	23,301,525	15,118	1,176	—	24,029,964
Energy	123	61.7	1,054	449	6.73	85.2	—	85.2	85.2	—	85.2	—	2,267,655	2,267,655	299	24.4	—	2,282,419
Water	—	—	—	—	—	—	—	—	—	—	—	39,711	65,563	105,274	4,085	98.3	—	236,680
Waste	—	—	—	—	—	—	—	—	—	—	—	235,071	0.00	235,071	23,495	0.00	—	822,435
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,056	4,056
Total	926,091	923,358	21,450	1,178,309	2,107	153,653	8,699	162,352	152,941	2,205	155,146	16,655,937	17,432,998	34,088,935	43,321	1,635	4,956	35,664,001
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5,217	4,915	2,718	28,939	76.8	33.4	8,699	8,733	31.2	2,205	2,236	—	7,813,084	7,813,084	348	357	23.4	7,928,143
Area	917,689	915,477	17,629	1,114,289	2,019	153,519	—	153,519	152,813	—	152,813	16,381,155	6,830,897	23,212,052	15,114	1,175	—	23,940,176
Energy	123	61.7	1,054	449	6.73	85.2	—	85.2	85.2	—	85.2	—	2,267,655	2,267,655	299	24.4	—	2,282,419
Water	—	—	—	—	—	—	—	—	—	—	—	39,711	65,563	105,274	4,085	98.3	—	236,680
Waste	—	—	—	—	—	—	—	—	—	—	—	235,071	0.00	235,071	23,495	0.00	—	822,435
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,056	4,056
Total	923,029	920,454	21,401	1,143,677	2,102	153,638	8,699	162,337	152,930	2,205	155,135	16,655,937	16,977,200	33,633,137	43,341	1,655	4,079	35,213,909
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4,916	4,628	2,544	27,559	74.1	31.9	8,264	8,296	29.9	2,095	2,125	—	7,535,396	7,535,396	327	337	372	7,644,438

Area	207,679	217,251	4,113	266,920	454	34,497	—	34,497	34,336	—	34,336	3,680,150	1,578,736	5,258,886	3,397	264	—	5,422,620
Energy	123	61.7	1,054	449	6.73	85.2	—	85.2	85.2	—	85.2	—	2,267,655	2,267,655	299	24.4	—	2,282,419
Water	—	—	—	—	—	—	—	—	—	—	—	39,711	65,563	105,274	4,085	98.3	—	236,680
Waste	—	—	—	—	—	—	—	—	—	—	—	235,071	0.00	235,071	23,495	0.00	—	822,435
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,056	4,056
Total	212,719	221,941	7,711	294,927	535	34,614	8,264	42,878	34,451	2,095	36,546	3,954,932	11,447,350	15,402,282	31,603	724	4,428	16,412,648
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	897	845	464	5,029	13.5	5.83	1,508	1,514	5.45	382	388	—	1,247,571	1,247,571	54.2	55.8	61.7	1,265,624
Area	37,901	39,648	751	48,713	82.9	6,296	—	6,296	6,266	—	6,266	609,291	261,378	870,669	562	43.8	—	897,777
Energy	22.5	11.3	192	81.9	1.23	15.6	—	15.6	15.6	—	15.6	—	375,436	375,436	49.5	4.05	—	377,881
Water	—	—	—	—	—	—	—	—	—	—	—	6,575	10,855	17,429	676	16.3	—	39,185
Waste	—	—	—	—	—	—	—	—	—	—	—	38,919	0.00	38,919	3,890	0.00	—	136,164
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	671	671
Total	38,821	40,504	1,407	53,824	97.6	6,317	1,508	7,825	6,287	382	6,670	654,784	1,895,239	2,550,024	5,232	120	733	2,717,301

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	5,210	4,912	2,458	29,938	80.4	33.3	8,699	8,733	31.2	2,205	2,236	—	8,179,409	8,179,409	324	336	901	8,288,447	
Total	5,210	4,912	2,458	29,938	80.4	33.3	8,699	8,733	31.2	2,205	2,236	—	8,179,409	8,179,409	324	336	901	8,288,447	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Apartments High Rise	5,217	4,915	2,718	28,939	76.8	33.4	8,699	8,733	31.2	2,205	2,236	—	7,813,084	7,813,084	348	357	23.4	7,928,143	
Total	5,217	4,915	2,718	28,939	76.8	33.4	8,699	8,733	31.2	2,205	2,236	—	7,813,084	7,813,084	348	357	23.4	7,928,143	
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Apartments High Rise	897	845	464	5,029	13.5	5.83	1,508	1,514	5.45	382	388	—	1,247,571	1,247,571	54.2	55.8	61.7	1,265,624	
Total	897	845	464	5,029	13.5	5.83	1,508	1,514	5.45	382	388	—	1,247,571	1,247,571	54.2	55.8	61.7	1,265,624	

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	929,560	929,560	181	21.9	—	940,613
Total	—	—	—	—	—	—	—	—	—	—	—	—	929,560	929,560	181	21.9	—	940,613
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	929,560	929,560	181	21.9	—	940,613
Total	—	—	—	—	—	—	—	—	—	—	—	—	929,560	929,560	181	21.9	—	940,613
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	153,899	153,899	29.9	3.63	—	155,729
Total	—	—	—	—	—	—	—	—	—	—	—	—	153,899	153,899	29.9	3.63	—	155,729

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	123	61.7	1,054	449	6.73	85.2	—	85.2	85.2	—	85.2	—	1,338,095	1,338,095	118	2.52	—	1,341,807
Total	123	61.7	1,054	449	6.73	85.2	—	85.2	85.2	—	85.2	—	1,338,095	1,338,095	118	2.52	—	1,341,807
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments High Rise	123	61.7	1,054	449	6.73	85.2	—	85.2	85.2	—	85.2	—	1,338,095	1,338,095	118	2.52	—	1,341,807
Total	123	61.7	1,054	449	6.73	85.2	—	85.2	85.2	—	85.2	—	1,338,095	1,338,095	118	2.52	—	1,341,807
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	22.5	11.3	192	81.9	1.23	15.6	—	15.6	15.6	—	15.6	—	221,537	221,537	19.6	0.42	—	222,151
Total	22.5	11.3	192	81.9	1.23	15.6	—	15.6	15.6	—	15.6	—	221,537	221,537	19.6	0.42	—	222,151

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	917,689	902,389	17,629	1,114,289	2,019	153,519	—	153,519	152,813	—	152,813	16,381,155	6,830,897	23,212,052	15,114	1,175	—	23,940,176
Consumer Products	—	12,118	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	971	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	3,069	2,907	309	33,633	1.45	15.0	—	15.0	11.3	—	11.3	—	89,473	89,473	3.74	0.74	—	89,787
Total	920,758	918,384	17,938	1,147,923	2,020	153,534	—	153,534	152,825	—	152,825	16,381,155	6,920,370	23,301,525	15,118	1,176	—	24,029,964

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	917,689	902,389	17,629	1,114,289	2,019	153,519	—	153,519	152,813	—	152,813	16,381,155	6,830,897	23,212,052	15,114	1,175	—	—	23,940,176
Consumer Products	—	12,118	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	971	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	917,689	915,477	17,629	1,114,289	2,019	153,519	—	153,519	152,813	—	152,813	16,381,155	6,830,897	23,212,052	15,114	1,175	—	—	23,940,176
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	37,625	36,998	723	45,686	82.8	6,294	—	6,294	6,265	—	6,265	609,291	254,073	863,363	562	43.7	—	—	890,446
Consumer Products	—	2,212	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	177	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	276	262	27.8	3,027	0.13	1.35	—	1.35	1.02	—	1.02	—	7,305	7,305	0.31	0.06	—	—	7,331
Total	37,901	39,648	751	48,713	82.9	6,296	—	6,296	6,266	—	6,266	609,291	261,378	870,669	562	43.8	—	—	897,777

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	39,711	65,563	105,274	4,085	98.3	—	236,680
Total	—	—	—	—	—	—	—	—	—	—	—	39,711	65,563	105,274	4,085	98.3	—	236,680
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	39,711	65,563	105,274	4,085	98.3	—	236,680
Total	—	—	—	—	—	—	—	—	—	—	—	39,711	65,563	105,274	4,085	98.3	—	236,680
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	6,575	10,855	17,429	676	16.3	—	39,185
Total	—	—	—	—	—	—	—	—	—	—	—	6,575	10,855	17,429	676	16.3	—	39,185

#### 4.5. Waste Emissions by Land Use

##### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	235,071	0.00	235,071	23,495	0.00	—	822,435
Total	—	—	—	—	—	—	—	—	—	—	—	235,071	0.00	235,071	23,495	0.00	—	822,435

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	235,071	0.00	235,071	23,495	0.00	—	822,435
Total	—	—	—	—	—	—	—	—	—	—	—	235,071	0.00	235,071	23,495	0.00	—	822,435
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	38,919	0.00	38,919	3,890	0.00	—	136,164
Total	—	—	—	—	—	—	—	—	—	—	—	38,919	0.00	38,919	3,890	0.00	—	136,164

#### 4.6. Refrigerant Emissions by Land Use

##### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,056	4,056
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,056	4,056
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,056	4,056
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,056	4,056

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	671	671
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	671	671

#### 4.7. Offroad Emissions By Equipment Type

##### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.8. Stationary Emissions By Equipment Type

##### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.9. User Defined Emissions By Equipment Type

##### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Remove d	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments High Rise	2,624,832	2,672,021	2,117,561	934,073,795	12,119,304	12,337,180	9,777,146	4,312,779,693

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments High Rise	—
Wood Fireplaces	206448
Gas Fireplaces	324418
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	58985

Conventional Wood Stoves	0
Catalytic Wood Stoves	29493
Non-Catalytic Wood Stoves	29493
Pellet Wood Stoves	0

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
1146668400	382,222,800	0.00	0.00	—

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments High Rise	2,000,104,623	170	0.0330	0.0040	4,175,215,655

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments High Rise	20,723,244,289	0.00

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments High Rise	436,175	—

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

### 5.15. Operational Off-Road Equipment

#### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------

### 5.16. Stationary Sources

#### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
----------------	-----------	----------------	---------------	----------------	------------	-------------

#### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
----------------	-----------	--------	--------------------------	------------------------------	------------------------------

### 5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

### 5.18. Vegetation

#### 5.18.1. Land Use Change

##### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

#### 5.18.1. Biomass Cover Type

##### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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#### 5.18.2. Sequestration

##### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 8. User Changes to Default Data

# Blueprint SD Initiative Model 2 - Mobile Homes Custom Report

## Table of Contents

### 1. Basic Project Information

#### 1.1. Basic Project Information

#### 1.2. Land Use Types

#### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

#### 2.4. Operations Emissions Compared Against Thresholds

#### 2.5. Operations Emissions by Sector, Unmitigated

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

#### 4.2. Energy

##### 4.2.1. Electricity Emissions By Land Use - Unmitigated

##### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

#### 4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated



## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

#### 5.10.2. Architectural Coatings

#### 5.10.3. Landscape Equipment

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

### 5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Blueprint SD Initiative Model 2 - Mobile Homes
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Mobile Home Park	2,742	Dwelling Unit	345	3,564,600	0.00	—	7,650	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4,309	4,317	112	5,497	9.91	715	44.6	760	712	11.3	723	77,427	101,177	178,605	203	7.83	30.2	186,046
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	4,295	4,303	112	5,335	9.88	715	44.6	760	712	11.3	723	77,427	98,882	176,309	203	7.93	25.6	183,780
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	993	1,056	48.6	1,391	2.60	162	42.8	205	161	10.9	172	18,385	73,421	91,806	149	3.61	27.5	96,628
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	181	193	8.88	254	0.47	29.5	7.81	37.4	29.4	1.98	31.4	3,044	12,156	15,200	24.6	0.60	4.55	15,998

### 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Blueprint SD Initiative Model 2 - Mobile Homes Custom Report, 4/25/2024

Mobile	26.7	25.2	12.6	154	0.41	0.17	44.6	44.8	0.16	11.3	11.5	—	41,968	41,968	1.66	1.72	4.62	42,528
Area	4,280	4,291	83.4	5,336	9.39	714	—	714	710	—	710	76,150	32,170	108,320	70.3	5.47	—	111,707
Energy	1.91	0.96	16.3	6.95	0.10	1.32	—	1.32	1.32	—	1.32	—	26,734	26,734	3.00	0.18	—	26,863
Water	—	—	—	—	—	—	—	—	—	—	—	185	305	489	19.0	0.46	—	1,100
Waste	—	—	—	—	—	—	—	—	—	—	—	1,093	0.00	1,093	109	0.00	—	3,823
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	25.5	25.5
Total	4,309	4,317	112	5,497	9.91	715	44.6	760	712	11.3	723	77,427	101,177	178,605	203	7.83	30.2	186,046
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	26.8	25.2	13.9	148	0.39	0.17	44.6	44.8	0.16	11.3	11.5	—	40,089	40,089	1.79	1.83	0.12	40,679
Area	4,266	4,277	81.9	5,180	9.38	714	—	714	710	—	710	76,150	31,754	107,904	70.3	5.46	—	111,289
Energy	1.91	0.96	16.3	6.95	0.10	1.32	—	1.32	1.32	—	1.32	—	26,734	26,734	3.00	0.18	—	26,863
Water	—	—	—	—	—	—	—	—	—	—	—	185	305	489	19.0	0.46	—	1,100
Waste	—	—	—	—	—	—	—	—	—	—	—	1,093	0.00	1,093	109	0.00	—	3,823
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	25.5	25.5
Total	4,295	4,303	112	5,335	9.88	715	44.6	760	712	11.3	723	77,427	98,882	176,309	203	7.93	25.6	183,780
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	25.5	24.0	13.2	143	0.38	0.17	42.8	43.0	0.15	10.9	11.0	—	39,043	39,043	1.69	1.75	1.93	39,608
Area	965	1,031	19.1	1,241	2.11	160	—	160	160	—	160	17,108	7,339	24,447	15.8	1.23	—	25,208
Energy	1.91	0.96	16.3	6.95	0.10	1.32	—	1.32	1.32	—	1.32	—	26,734	26,734	3.00	0.18	—	26,863
Water	—	—	—	—	—	—	—	—	—	—	—	185	305	489	19.0	0.46	—	1,100
Waste	—	—	—	—	—	—	—	—	—	—	—	1,093	0.00	1,093	109	0.00	—	3,823
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	25.5	25.5
Total	993	1,056	48.6	1,391	2.60	162	42.8	205	161	10.9	172	18,385	73,421	91,806	149	3.61	27.5	96,628
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.65	4.38	2.41	26.1	0.07	0.03	7.81	7.84	0.03	1.98	2.01	—	6,464	6,464	0.28	0.29	0.32	6,558
Area	176	188	3.49	226	0.39	29.3	—	29.3	29.1	—	29.1	2,832	1,215	4,047	2.61	0.20	—	4,173

Energy	0.35	0.17	2.98	1.27	0.02	0.24	—	0.24	0.24	—	0.24	—	4,426	4,426	0.50	0.03	—	4,447
Water	—	—	—	—	—	—	—	—	—	—	—	30.6	50.5	81.0	3.14	0.08	—	182
Waste	—	—	—	—	—	—	—	—	—	—	—	181	0.00	181	18.1	0.00	—	633
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4.23	4.23
Total	181	193	8.88	254	0.47	29.5	7.81	37.4	29.4	1.98	31.4	3,044	12,156	15,200	24.6	0.60	4.55	15,998

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	26.7	25.2	12.6	154	0.41	0.17	44.6	44.8	0.16	11.3	11.5	—	41,968	41,968	1.66	1.72	4.62	42,528
Total	26.7	25.2	12.6	154	0.41	0.17	44.6	44.8	0.16	11.3	11.5	—	41,968	41,968	1.66	1.72	4.62	42,528
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	26.8	25.2	13.9	148	0.39	0.17	44.6	44.8	0.16	11.3	11.5	—	40,089	40,089	1.79	1.83	0.12	40,679
Total	26.8	25.2	13.9	148	0.39	0.17	44.6	44.8	0.16	11.3	11.5	—	40,089	40,089	1.79	1.83	0.12	40,679
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	4.65	4.38	2.41	26.1	0.07	0.03	7.81	7.84	0.03	1.98	2.01	—	6,464	6,464	0.28	0.29	0.32	6,558



Total	4.65	4.38	2.41	26.1	0.07	0.03	7.81	7.84	0.03	1.98	2.01	—	6,464	6,464	0.28	0.29	0.32	6,558
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## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	5,990	5,990	1.17	0.14	—	6,062
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,990	5,990	1.17	0.14	—	6,062
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	5,990	5,990	1.17	0.14	—	6,062
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,990	5,990	1.17	0.14	—	6,062
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	992	992	0.19	0.02	—	1,004
Total	—	—	—	—	—	—	—	—	—	—	—	—	992	992	0.19	0.02	—	1,004

### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	1.91	0.96	16.3	6.95	0.10	1.32	—	1.32	1.32	—	1.32	—	20,743	20,743	1.84	0.04	—	20,801
Total	1.91	0.96	16.3	6.95	0.10	1.32	—	1.32	1.32	—	1.32	—	20,743	20,743	1.84	0.04	—	20,801
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	1.91	0.96	16.3	6.95	0.10	1.32	—	1.32	1.32	—	1.32	—	20,743	20,743	1.84	0.04	—	20,801
Total	1.91	0.96	16.3	6.95	0.10	1.32	—	1.32	1.32	—	1.32	—	20,743	20,743	1.84	0.04	—	20,801
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	0.35	0.17	2.98	1.27	0.02	0.24	—	0.24	0.24	—	0.24	—	3,434	3,434	0.30	0.01	—	3,444
Total	0.35	0.17	2.98	1.27	0.02	0.24	—	0.24	0.24	—	0.24	—	3,434	3,434	0.30	0.01	—	3,444

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4,266	4,195	81.9	5,180	9.38	714	—	714	710	—	710	76,150	31,754	107,904	70.3	5.46	—	111,289
Consumer Products	—	76.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	—	6.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	14.3	13.5	1.44	156	0.01	0.07	—	0.07	0.05	—	0.05	—	416	416	0.02	< 0.005	—	417
Total	4,280	4,291	83.4	5,336	9.39	714	—	714	710	—	710	76,150	32,170	108,320	70.3	5.47	—	111,707
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	4,266	4,195	81.9	5,180	9.38	714	—	714	710	—	710	76,150	31,754	107,904	70.3	5.46	—	111,289
Consumer Products	—	76.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	6.11	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	4,266	4,277	81.9	5,180	9.38	714	—	714	710	—	710	76,150	31,754	107,904	70.3	5.46	—	111,289
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	175	172	3.36	212	0.38	29.3	—	29.3	29.1	—	29.1	2,832	1,181	4,013	2.61	0.20	—	4,139
Consumer Products	—	13.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	1.12	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.28	1.22	0.13	14.1	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	34.0	34.0	< 0.005	< 0.005	—	34.1
Total	176	188	3.49	226	0.39	29.3	—	29.3	29.1	—	29.1	2,832	1,215	4,047	2.61	0.20	—	4,173

#### 4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	185	305	489	19.0	0.46	—	1,100
Total	—	—	—	—	—	—	—	—	—	—	—	185	305	489	19.0	0.46	—	1,100
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	185	305	489	19.0	0.46	—	1,100
Total	—	—	—	—	—	—	—	—	—	—	—	185	305	489	19.0	0.46	—	1,100
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	30.6	50.5	81.0	3.14	0.08	—	182
Total	—	—	—	—	—	—	—	—	—	—	—	30.6	50.5	81.0	3.14	0.08	—	182

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	1,093	0.00	1,093	109	0.00	—	3,823
Total	—	—	—	—	—	—	—	—	—	—	—	1,093	0.00	1,093	109	0.00	—	3,823
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	1,093	0.00	1,093	109	0.00	—	3,823
Total	—	—	—	—	—	—	—	—	—	—	—	1,093	0.00	1,093	109	0.00	—	3,823
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	181	0.00	181	18.1	0.00	—	633
Total	—	—	—	—	—	—	—	—	—	—	—	181	0.00	181	18.1	0.00	—	633

#### 4.6. Refrigerant Emissions by Land Use

##### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	25.5	25.5
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	25.5	25.5

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	25.5	25.5
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	25.5	25.5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4.23	4.23
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4.23	4.23

#### 4.7. Offroad Emissions By Equipment Type

##### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



### 4.8. Stationary Emissions By Equipment Type

#### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 4.9. User Defined Emissions By Equipment Type

#### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

##### 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Mobile Home Park	13,710	12,641	11,626	4,839,728	63,301	58,364	53,680	22,345,858

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
-------------	----------------------

Mobile Home Park	—
Wood Fireplaces	960
Gas Fireplaces	1508
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	274
Conventional Wood Stoves	0
Catalytic Wood Stoves	137
Non-Catalytic Wood Stoves	137
Pellet Wood Stoves	0

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
7218315	2,406,105	0.00	0.00	—

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

#### Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Mobile Home Park	12,889,557	170	0.0330	0.0040	64,725,148

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Mobile Home Park	96,334,892	0.00

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Mobile Home Park	2,028	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Mobile Home Park	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Mobile Home Park	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------



## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
----------------	-----------	----------------	---------------	----------------	------------	-------------

### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
----------------	-----------	--------	--------------------------	------------------------------	------------------------------

## 5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
-----------	--------	------------------------------	------------------------------

## 8. User Changes to Default Data

# Blueprint SD Initiative Model 3 - Single Family Homes Custom Report

## Table of Contents

### 1. Basic Project Information

#### 1.1. Basic Project Information

#### 1.2. Land Use Types

#### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

#### 2.4. Operations Emissions Compared Against Thresholds

#### 2.5. Operations Emissions by Sector, Unmitigated

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

#### 4.2. Energy

##### 4.2.1. Electricity Emissions By Land Use - Unmitigated

##### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

#### 4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

#### 5.10.2. Architectural Coatings

#### 5.10.3. Landscape Equipment

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

### 5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data



# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Blueprint SD Initiative Model 3 - Single Family Homes
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	28,033	Dwelling Unit	9,102	54,663,960	328,344,178	—	78,212	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	44,304	44,791	1,300	57,638	105	7,316	871	8,187	7,282	221	7,503	790,400	1,501,658	2,292,057	1,985	96.9	482	2,371,033
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	44,159	44,654	1,312	55,939	105	7,316	871	8,186	7,282	221	7,503	790,400	1,460,741	2,251,141	1,987	99.0	394	2,330,705
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10,396	11,451	657	15,587	30.4	1,659	844	2,503	1,651	214	1,865	186,781	1,199,045	1,385,825	1,429	54.4	430	1,438,191
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1,897	2,090	120	2,845	5.56	303	154	457	301	39.1	340	30,924	198,516	229,439	237	9.01	71.1	238,109

### 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Blueprint SD Initiative Model 3 - Single Family Homes Custom Report, 4/25/2024

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	521	492	246	2,996	8.05	3.34	871	874	3.12	221	224	—	818,648	818,648	32.5	33.6	90.1	829,561
Area	43,759	44,288	852	54,555	96.0	7,297	—	7,297	7,263	—	7,263	778,519	328,893	1,107,412	718	55.9	—	1,142,031
Energy	23.6	11.8	202	85.9	1.29	16.3	—	16.3	16.3	—	16.3	—	336,210	336,210	38.2	2.37	—	337,872
Water	—	—	—	—	—	—	—	—	—	—	—	1,887	17,907	19,794	197	5.02	—	26,215
Waste	—	—	—	—	—	—	—	—	—	—	—	9,993	0.00	9,993	999	0.00	—	34,962
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Total	44,304	44,791	1,300	57,638	105	7,316	871	8,187	7,282	221	7,503	790,400	1,501,658	2,292,057	1,985	96.9	482	2,371,033
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	522	492	272	2,896	7.69	3.34	871	874	3.12	221	224	—	781,983	781,983	34.9	35.7	2.34	793,499
Area	43,613	44,150	838	52,957	95.9	7,296	—	7,296	7,263	—	7,263	778,519	324,640	1,103,160	718	55.9	—	1,137,764
Energy	23.6	11.8	202	85.9	1.29	16.3	—	16.3	16.3	—	16.3	—	336,210	336,210	38.2	2.37	—	337,872
Water	—	—	—	—	—	—	—	—	—	—	—	1,887	17,907	19,794	197	5.02	—	26,215
Waste	—	—	—	—	—	—	—	—	—	—	—	9,993	0.00	9,993	999	0.00	—	34,962
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Total	44,159	44,654	1,312	55,939	105	7,316	871	8,186	7,282	221	7,503	790,400	1,460,741	2,251,141	1,987	99.0	394	2,330,705
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	502	473	260	2,816	7.57	3.26	844	848	3.05	214	217	—	769,897	769,897	33.4	34.5	38.1	781,038
Area	9,870	10,966	195	12,685	21.6	1,639	—	1,639	1,632	—	1,632	174,900	75,030	249,930	161	12.6	—	257,712
Energy	23.6	11.8	202	85.9	1.29	16.3	—	16.3	16.3	—	16.3	—	336,210	336,210	38.2	2.37	—	337,872
Water	—	—	—	—	—	—	—	—	—	—	—	1,887	17,907	19,794	197	5.02	—	26,215
Waste	—	—	—	—	—	—	—	—	—	—	—	9,993	0.00	9,993	999	0.00	—	34,962

Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Total	10,396	11,451	657	15,587	30.4	1,659	844	2,503	1,651	214	1,865	186,781	1,199,045	1,385,825	1,429	54.4	430	1,438,191
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	91.7	86.3	47.4	514	1.38	0.60	154	155	0.56	39.1	39.6	—	127,465	127,465	5.53	5.70	6.30	129,310
Area	1,801	2,001	35.7	2,315	3.94	299	—	299	298	—	298	28,957	12,422	41,379	26.7	2.08	—	42,667
Energy	4.31	2.16	36.8	15.7	0.24	2.98	—	2.98	2.98	—	2.98	—	55,663	55,663	6.33	0.39	—	55,939
Water	—	—	—	—	—	—	—	—	—	—	—	312	2,965	3,277	32.6	0.83	—	4,340
Waste	—	—	—	—	—	—	—	—	—	—	—	1,654	0.00	1,654	165	0.00	—	5,788
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	64.8	64.8
Total	1,897	2,090	120	2,845	5.56	303	154	457	301	39.1	340	30,924	198,516	229,439	237	9.01	71.1	238,109

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	521	492	246	2,996	8.05	3.34	871	874	3.12	221	224	—	818,648	818,648	32.5	33.6	90.1	829,561
Total	521	492	246	2,996	8.05	3.34	871	874	3.12	221	224	—	818,648	818,648	32.5	33.6	90.1	829,561
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	522	492	272	2,896	7.69	3.34	871	874	3.12	221	224	—	781,983	781,983	34.9	35.7	2.34	793,499
Total	522	492	272	2,896	7.69	3.34	871	874	3.12	221	224	—	781,983	781,983	34.9	35.7	2.34	793,499
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	91.7	86.3	47.4	514	1.38	0.60	154	155	0.56	39.1	39.6	—	127,465	127,465	5.53	5.70	6.30	129,310
Total	91.7	86.3	47.4	514	1.38	0.60	154	155	0.56	39.1	39.6	—	127,465	127,465	5.53	5.70	6.30	129,310

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	80,011	80,011	15.6	1.89	—	80,962
Total	—	—	—	—	—	—	—	—	—	—	—	—	80,011	80,011	15.6	1.89	—	80,962
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	80,011	80,011	15.6	1.89	—	80,962
Total	—	—	—	—	—	—	—	—	—	—	—	—	80,011	80,011	15.6	1.89	—	80,962
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	13,247	13,247	2.58	0.31	—	13,404
Total	—	—	—	—	—	—	—	—	—	—	—	—	13,247	13,247	2.58	0.31	—	13,404

### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	23.6	11.8	202	85.9	1.29	16.3	—	16.3	16.3	—	16.3	—	256,199	256,199	22.7	0.48	—	256,910
Total	23.6	11.8	202	85.9	1.29	16.3	—	16.3	16.3	—	16.3	—	256,199	256,199	22.7	0.48	—	256,910
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	23.6	11.8	202	85.9	1.29	16.3	—	16.3	16.3	—	16.3	—	256,199	256,199	22.7	0.48	—	256,910
Total	23.6	11.8	202	85.9	1.29	16.3	—	16.3	16.3	—	16.3	—	256,199	256,199	22.7	0.48	—	256,910
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	4.31	2.16	36.8	15.7	0.24	2.98	—	2.98	2.98	—	2.98	—	42,417	42,417	3.75	0.08	—	42,534
Total	4.31	2.16	36.8	15.7	0.24	2.98	—	2.98	2.98	—	2.98	—	42,417	42,417	3.75	0.08	—	42,534

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated



Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	43,613	42,886	838	52,957	95.9	7,296	—	7,296	7,263	—	7,263	778,519	324,640	1,103,160	718	55.9	—	1,137,764
Consumer Products	—	1,170	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	93.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	146	138	14.7	1,598	0.07	0.71	—	0.71	0.54	—	0.54	—	4,252	4,252	0.18	0.04	—	4,267
Total	43,759	44,288	852	54,555	96.0	7,297	—	7,297	7,263	—	7,263	778,519	328,893	1,107,412	718	55.9	—	1,142,031
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	43,613	42,886	838	52,957	95.9	7,296	—	7,296	7,263	—	7,263	778,519	324,640	1,103,160	718	55.9	—	1,137,764
Consumer Products	—	1,170	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	93.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	43,613	44,150	838	52,957	95.9	7,296	—	7,296	7,263	—	7,263	778,519	324,640	1,103,160	718	55.9	—	1,137,764
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1,788	1,758	34.4	2,171	3.93	299	—	299	298	—	298	28,957	12,075	41,032	26.7	2.08	—	42,319

Consumer	—	213	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	17.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	13.1	12.4	1.32	144	0.01	0.06	—	0.06	0.05	—	0.05	—	347	347	0.01	< 0.005	—	348
Total	1,801	2,001	35.7	2,315	3.94	299	—	299	298	—	298	28,957	12,422	41,379	26.7	2.08	—	42,667

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,887	17,907	19,794	197	5.02	—	26,215
Total	—	—	—	—	—	—	—	—	—	—	—	1,887	17,907	19,794	197	5.02	—	26,215
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,887	17,907	19,794	197	5.02	—	26,215
Total	—	—	—	—	—	—	—	—	—	—	—	1,887	17,907	19,794	197	5.02	—	26,215
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	312	2,965	3,277	32.6	0.83	—	4,340
Total	—	—	—	—	—	—	—	—	—	—	—	312	2,965	3,277	32.6	0.83	—	4,340

#### 4.5. Waste Emissions by Land Use

##### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	9,993	0.00	9,993	999	0.00	—	34,962
Total	—	—	—	—	—	—	—	—	—	—	—	9,993	0.00	9,993	999	0.00	—	34,962
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	9,993	0.00	9,993	999	0.00	—	34,962
Total	—	—	—	—	—	—	—	—	—	—	—	9,993	0.00	9,993	999	0.00	—	34,962
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,654	0.00	1,654	165	0.00	—	5,788
Total	—	—	—	—	—	—	—	—	—	—	—	1,654	0.00	1,654	165	0.00	—	5,788

#### 4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	392	392
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	64.8	64.8
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	64.8	64.8

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.8. Stationary Emissions By Equipment Type

##### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
-------	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---	---

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	264,630	267,433	239,680	95,435,062	1,221,841	1,234,784	1,106,646	440,640,128

## 5.10. Operational Area Sources

### 5.10.1. Hearths

#### 5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	9811
Gas Fireplaces	15418
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	2803
Conventional Wood Stoves	0
Catalytic Wood Stoves	1402
Non-Catalytic Wood Stoves	1402
Pellet Wood Stoves	0

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
110694519	36,898,173	0.00	0.00	—

### 5.10.3. Landscape Equipment

Season	Unit	Value
--------	------	-------

Snow Days	day/yr	0.00
Summer Days	day/yr	180

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	172,157,206	170	0.0330	0.0040	799,409,486

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	984,878,465	5,997,235,608

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	18,542	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
---------------	----------------	-------------	-----	---------------	----------------------	-------------------	----------------

Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

### 5.15. Operational Off-Road Equipment

#### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------

### 5.16. Stationary Sources

#### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
----------------	-----------	----------------	---------------	----------------	------------	-------------

#### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
----------------	-----------	--------	--------------------------	------------------------------	------------------------------

### 5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

### 5.18. Vegetation

#### 5.18.1. Land Use Change

##### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
-----------	--------	------------------------------	------------------------------

## 8. User Changes to Default Data



# Blueprint SD Initiative Model 3 - Multi Family Residential Custom Report

## Table of Contents

### 1. Basic Project Information

#### 1.1. Basic Project Information

#### 1.2. Land Use Types

#### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

#### 2.4. Operations Emissions Compared Against Thresholds

#### 2.5. Operations Emissions by Sector, Unmitigated

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

#### 4.2. Energy

##### 4.2.1. Electricity Emissions By Land Use - Unmitigated

##### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

#### 4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

#### 5.10.2. Architectural Coatings

#### 5.10.3. Landscape Equipment

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

### 5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Blueprint SD Initiative Model 3 - Multi Family Residential
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments High Rise	356,507	Dwelling Unit	5,750	342,246,720	0.00	—	994,655	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	559,732	558,080	12,964	712,173	1,274	92,868	5,258	98,126	92,438	1,333	93,771	10,066,895	10,536,553	20,603,448	26,183	988	2,995	21,555,423
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	557,881	556,325	12,935	691,242	1,271	92,859	5,258	98,117	92,431	1,333	93,764	10,066,895	10,261,067	20,327,963	26,195	1,000	2,465	21,283,386
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	128,568	134,142	4,660	178,255	323	20,921	4,995	25,916	20,823	1,266	22,089	2,390,372	6,918,811	9,309,183	19,101	438	2,676	9,919,851
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	23,464	24,481	851	32,531	59.0	3,818	912	4,730	3,800	231	4,031	395,753	1,145,488	1,541,241	3,162	72.5	443	1,642,345

### 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Blueprint SD Initiative Model 3 - Multi Family Residential Custom Report, 4/25/2024

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	3,149	2,969	1,485	18,094	48.6	20.2	5,258	5,278	18.8	1,333	1,351	—	4,943,658	4,943,658	196	203	544	5,009,561	
Area	556,509	555,074	10,842	693,808	1,221	92,797	—	92,797	92,368	—	92,368	9,900,816	4,182,691	14,083,507	9,137	711	—	14,523,778	
Energy	74.6	37.3	637	271	4.07	51.5	—	51.5	51.5	—	51.5	—	1,370,577	1,370,577	181	14.8	—	1,379,501	
Water	—	—	—	—	—	—	—	—	—	—	—	24,001	39,626	63,628	2,469	59.4	—	143,050	
Waste	—	—	—	—	—	—	—	—	—	—	—	142,078	0.00	142,078	14,200	0.00	—	497,082	
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2,451	2,451	
Total	559,732	558,080	12,964	712,173	1,274	92,868	5,258	98,126	92,438	1,333	93,771	10,066,895	10,536,553	20,603,448	26,183	988	2,995	21,555,423	
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Mobile	3,153	2,971	1,643	17,491	46.4	20.2	5,258	5,278	18.9	1,333	1,351	—	4,722,250	4,722,250	211	216	14.1	4,791,792	
Area	554,654	553,317	10,655	673,480	1,220	92,787	—	92,787	92,361	—	92,361	9,900,816	4,128,614	14,029,430	9,135	710	—	14,469,510	
Energy	74.6	37.3	637	271	4.07	51.5	—	51.5	51.5	—	51.5	—	1,370,577	1,370,577	181	14.8	—	1,379,501	
Water	—	—	—	—	—	—	—	—	—	—	—	24,001	39,626	63,628	2,469	59.4	—	143,050	
Waste	—	—	—	—	—	—	—	—	—	—	—	142,078	0.00	142,078	14,200	0.00	—	497,082	
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2,451	2,451	
Total	557,881	556,325	12,935	691,242	1,271	92,859	5,258	98,117	92,431	1,333	93,764	10,066,895	10,261,067	20,327,963	26,195	1,000	2,465	21,283,386	
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	
Mobile	2,971	2,797	1,537	16,657	44.8	19.3	4,995	5,014	18.1	1,266	1,284	—	4,554,414	4,554,414	198	204	225	4,620,320	

Blueprint SD Initiative Model 3 - Multi Family Residential Custom Report, 4/25/2024

Area	125,522	131,307	2,486	161,327	275	20,850	—	20,850	20,753	—	20,753	2,224,293	954,193	3,178,485	2,053	160	—	3,277,447
Energy	74.6	37.3	637	271	4.07	51.5	—	51.5	51.5	—	51.5	—	1,370,577	1,370,577	181	14.8	—	1,379,501
Water	—	—	—	—	—	—	—	—	—	—	—	24,001	39,626	63,628	2,469	59.4	—	143,050
Waste	—	—	—	—	—	—	—	—	—	—	—	142,078	0.00	142,078	14,200	0.00	—	497,082
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2,451	2,451
Total	128,568	134,142	4,660	178,255	323	20,921	4,995	25,916	20,823	1,266	22,089	2,390,372	6,918,811	9,309,183	19,101	438	2,676	9,919,851
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	542	511	281	3,040	8.17	3.52	912	915	3.29	231	234	—	754,035	754,035	32.7	33.7	37.3	764,947
Area	22,908	23,964	454	29,442	50.1	3,805	—	3,805	3,787	—	3,787	368,257	157,977	526,235	340	26.5	—	542,619
Energy	13.6	6.80	116	49.5	0.74	9.40	—	9.40	9.40	—	9.40	—	226,915	226,915	29.9	2.45	—	228,392
Water	—	—	—	—	—	—	—	—	—	—	—	3,974	6,561	10,534	409	9.84	—	23,684
Waste	—	—	—	—	—	—	—	—	—	—	—	23,523	0.00	23,523	2,351	0.00	—	82,298
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	406	406
Total	23,464	24,481	851	32,531	59.0	3,818	912	4,730	3,800	231	4,031	395,753	1,145,488	1,541,241	3,162	72.5	443	1,642,345

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Blueprint SD Initiative Model 3 - Multi Family Residential Custom Report, 4/25/2024

Apartme High Rise	3,149	2,969	1,485	18,094	48.6	20.2	5,258	5,278	18.8	1,333	1,351	—	4,943,65	4,943,65	196	203	544	5,009,56
Total	3,149	2,969	1,485	18,094	48.6	20.2	5,258	5,278	18.8	1,333	1,351	—	4,943,65 8	4,943,65 8	196	203	544	5,009,56 1
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	3,153	2,971	1,643	17,491	46.4	20.2	5,258	5,278	18.9	1,333	1,351	—	4,722,25 0	4,722,25 0	211	216	14.1	4,791,79 2
Total	3,153	2,971	1,643	17,491	46.4	20.2	5,258	5,278	18.9	1,333	1,351	—	4,722,25 0	4,722,25 0	211	216	14.1	4,791,79 2
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	542	511	281	3,040	8.17	3.52	912	915	3.29	231	234	—	754,035	754,035	32.7	33.7	37.3	764,947
Total	542	511	281	3,040	8.17	3.52	912	915	3.29	231	234	—	754,035	754,035	32.7	33.7	37.3	764,947

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	—	—	—	—	—	—	—	—	—	—	—	—	561,829	561,829	109	13.2	—	568,509
Total	—	—	—	—	—	—	—	—	—	—	—	—	561,829	561,829	109	13.2	—	568,509

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	561,829	561,829	109	13.2	—	568,509
Total	—	—	—	—	—	—	—	—	—	—	—	—	561,829	561,829	109	13.2	—	568,509
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	93,017	93,017	18.1	2.19	—	94,123
Total	—	—	—	—	—	—	—	—	—	—	—	—	93,017	93,017	18.1	2.19	—	94,123

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	74.6	37.3	637	271	4.07	51.5	—	51.5	51.5	—	51.5	—	808,749	808,749	71.6	1.52	—	810,992
Total	74.6	37.3	637	271	4.07	51.5	—	51.5	51.5	—	51.5	—	808,749	808,749	71.6	1.52	—	810,992
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	74.6	37.3	637	271	4.07	51.5	—	51.5	51.5	—	51.5	—	808,749	808,749	71.6	1.52	—	810,992
Total	74.6	37.3	637	271	4.07	51.5	—	51.5	51.5	—	51.5	—	808,749	808,749	71.6	1.52	—	810,992
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments	13.6	6.80	116	49.5	0.74	9.40	—	9.40	9.40	—	9.40	—	133,898	133,898	11.8	0.25	—	134,269
Total	13.6	6.80	116	49.5	0.74	9.40	—	9.40	9.40	—	9.40	—	133,898	133,898	11.8	0.25	—	134,269

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	554,654	545,406	10,655	673,480	1,220	92,787	—	92,787	92,361	—	92,361	9,900,816	4,128,614	14,029,430	9,135	710	—	14,469,510
Consumer Products	—	7,324	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	587	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1,855	1,757	187	20,328	0.88	9.04	—	9.04	6.85	—	6.85	—	54,078	54,078	2.26	0.45	—	54,268
Total	556,509	555,074	10,842	693,808	1,221	92,797	—	92,797	92,368	—	92,368	9,900,816	4,182,691	14,083,507	9,137	711	—	14,523,778
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	554,654	545,406	10,655	673,480	1,220	92,787	—	92,787	92,361	—	92,361	9,900,816	4,128,614	14,029,430	9,135	710	—	14,469,510
Consumer Products	—	7,324	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architect Coatings	—	587	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	554,654	553,317	10,655	673,480	1,220	92,787	—	92,787	92,361	—	92,361	9,900,816	4,128,614	14,029,430	9,135	710	—	14,469,510
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	22,741	22,362	437	27,613	50.0	3,804	—	3,804	3,787	—	3,787	368,257	153,562	521,819	340	26.4	—	538,188
Consumer Products	—	1,337	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	107	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	167	158	16.8	1,830	0.08	0.81	—	0.81	0.62	—	0.62	—	4,415	4,415	0.18	0.04	—	4,431
Total	22,908	23,964	454	29,442	50.1	3,805	—	3,805	3,787	—	3,787	368,257	157,977	526,235	340	26.5	—	542,619

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	24,001	39,626	63,628	2,469	59.4	—	143,050
Total	—	—	—	—	—	—	—	—	—	—	—	24,001	39,626	63,628	2,469	59.4	—	143,050



Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	24,001	39,626	63,628	2,469	59.4	—	143,050
Total	—	—	—	—	—	—	—	—	—	—	—	24,001	39,626	63,628	2,469	59.4	—	143,050
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	3,974	6,561	10,534	409	9.84	—	23,684
Total	—	—	—	—	—	—	—	—	—	—	—	3,974	6,561	10,534	409	9.84	—	23,684

#### 4.5. Waste Emissions by Land Use

##### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	142,078	0.00	142,078	14,200	0.00	—	497,082
Total	—	—	—	—	—	—	—	—	—	—	—	142,078	0.00	142,078	14,200	0.00	—	497,082
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	142,078	0.00	142,078	14,200	0.00	—	497,082
Total	—	—	—	—	—	—	—	—	—	—	—	142,078	0.00	142,078	14,200	0.00	—	497,082

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	23,523	0.00	23,523	2,351	0.00	—	82,298
Total	—	—	—	—	—	—	—	—	—	—	—	23,523	0.00	23,523	2,351	0.00	—	82,298

#### 4.6. Refrigerant Emissions by Land Use

##### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2,451	2,451
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2,451	2,451
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2,451	2,451
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2,451	2,451
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	406	406
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	406	406

### 4.7. Offroad Emissions By Equipment Type

#### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 4.8. Stationary Emissions By Equipment Type

#### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.9. User Defined Emissions By Equipment Type

##### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments High Rise	1,586,456	1,614,977	1,279,860	564,556,830	7,324,941	7,456,626	5,909,335	2,606,656,184

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments High Rise	—
Wood Fireplaces	124777
Gas Fireplaces	196079
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	35651
Conventional Wood Stoves	0
Catalytic Wood Stoves	17825
Non-Catalytic Wood Stoves	17825
Pellet Wood Stoves	0

#### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
693049608	231,016,536	0.00	0.00	—

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments High Rise	1,208,868,863	170	0.0330	0.0040	2,523,512,092

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments High Rise	12,525,187,169	0.00

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments High Rise	263,625	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------

## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
----------------	-----------	----------------	---------------	----------------	------------	-------------

### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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## 5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 8. User Changes to Default Data

# Blueprint SD Initiative Model 3 - Mobile Homes Custom Report

## Table of Contents

### 1. Basic Project Information

#### 1.1. Basic Project Information

#### 1.2. Land Use Types

#### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

#### 2.4. Operations Emissions Compared Against Thresholds

#### 2.5. Operations Emissions by Sector, Unmitigated

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

#### 4.2. Energy

##### 4.2.1. Electricity Emissions By Land Use - Unmitigated

##### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

#### 4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated



## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

#### 5.10.2. Architectural Coatings

#### 5.10.3. Landscape Equipment

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

### 5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Blueprint SD Initiative Model 3 - Mobile Homes
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Mobile Home Park	2,426	Dwelling Unit	306	3,153,800	0.00	—	6,769	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3,812	3,819	99.4	4,863	8.77	633	39.5	672	630	10.0	640	68,504	89,517	158,022	180	6.93	26.7	164,605
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	3,800	3,808	99.3	4,720	8.74	633	39.5	672	630	10.0	640	68,504	87,486	155,991	180	7.02	22.7	162,600
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	878	935	43.0	1,230	2.30	143	37.9	181	143	9.60	152	16,266	64,960	81,226	132	3.20	24.3	85,492
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	160	171	7.85	225	0.42	26.1	6.91	33.0	26.0	1.75	27.8	2,693	10,755	13,448	21.8	0.53	4.02	14,154

### 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Blueprint SD Initiative Model 3 - Mobile Homes Custom Report, 4/25/2024

Mobile	23.6	22.3	11.2	136	0.37	0.15	39.5	39.6	0.14	10.0	10.2	—	37,132	37,132	1.47	1.52	4.09	37,627
Area	3,787	3,796	73.8	4,721	8.31	631	—	631	629	—	629	67,374	28,463	95,837	62.2	4.84	—	98,833
Energy	1.69	0.85	14.5	6.15	0.09	1.17	—	1.17	1.17	—	1.17	—	23,653	23,653	2.66	0.16	—	23,767
Water	—	—	—	—	—	—	—	—	—	—	—	163	270	433	16.8	0.40	—	973
Waste	—	—	—	—	—	—	—	—	—	—	—	967	0.00	967	96.6	0.00	—	3,383
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	22.6	22.6
Total	3,812	3,819	99.4	4,863	8.77	633	39.5	672	630	10.0	640	68,504	89,517	158,022	180	6.93	26.7	164,605
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	23.7	22.3	12.3	131	0.35	0.15	39.5	39.6	0.14	10.0	10.2	—	35,469	35,469	1.58	1.62	0.11	35,991
Area	3,774	3,784	72.5	4,583	8.30	631	—	631	629	—	629	67,374	28,095	95,469	62.2	4.83	—	98,464
Energy	1.69	0.85	14.5	6.15	0.09	1.17	—	1.17	1.17	—	1.17	—	23,653	23,653	2.66	0.16	—	23,767
Water	—	—	—	—	—	—	—	—	—	—	—	163	270	433	16.8	0.40	—	973
Waste	—	—	—	—	—	—	—	—	—	—	—	967	0.00	967	96.6	0.00	—	3,383
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	22.6	22.6
Total	3,800	3,808	99.3	4,720	8.74	633	39.5	672	630	10.0	640	68,504	87,486	155,991	180	7.02	22.7	162,600
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	22.5	21.2	11.7	126	0.34	0.15	37.9	38.0	0.14	9.60	9.74	—	34,544	34,544	1.50	1.55	1.71	35,044
Area	854	913	16.9	1,098	1.87	142	—	142	141	—	141	15,136	6,493	21,629	14.0	1.09	—	22,303
Energy	1.69	0.85	14.5	6.15	0.09	1.17	—	1.17	1.17	—	1.17	—	23,653	23,653	2.66	0.16	—	23,767
Water	—	—	—	—	—	—	—	—	—	—	—	163	270	433	16.8	0.40	—	973
Waste	—	—	—	—	—	—	—	—	—	—	—	967	0.00	967	96.6	0.00	—	3,383
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	22.6	22.6
Total	878	935	43.0	1,230	2.30	143	37.9	181	143	9.60	152	16,266	64,960	81,226	132	3.20	24.3	85,492
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4.11	3.87	2.13	23.1	0.06	0.03	6.91	6.94	0.02	1.75	1.78	—	5,719	5,719	0.25	0.26	0.28	5,802
Area	156	167	3.09	200	0.34	25.9	—	25.9	25.8	—	25.8	2,506	1,075	3,581	2.31	0.18	—	3,692

Energy	0.31	0.15	2.64	1.12	0.02	0.21	—	0.21	0.21	—	0.21	—	3,916	3,916	0.44	0.03	—	3,935
Water	—	—	—	—	—	—	—	—	—	—	—	27.0	44.6	71.7	2.78	0.07	—	161
Waste	—	—	—	—	—	—	—	—	—	—	—	160	0.00	160	16.0	0.00	—	560
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.74	3.74
Total	160	171	7.85	225	0.42	26.1	6.91	33.0	26.0	1.75	27.8	2,693	10,755	13,448	21.8	0.53	4.02	14,154

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	23.6	22.3	11.2	136	0.37	0.15	39.5	39.6	0.14	10.0	10.2	—	37,132	37,132	1.47	1.52	4.09	37,627
Total	23.6	22.3	11.2	136	0.37	0.15	39.5	39.6	0.14	10.0	10.2	—	37,132	37,132	1.47	1.52	4.09	37,627
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	23.7	22.3	12.3	131	0.35	0.15	39.5	39.6	0.14	10.0	10.2	—	35,469	35,469	1.58	1.62	0.11	35,991
Total	23.7	22.3	12.3	131	0.35	0.15	39.5	39.6	0.14	10.0	10.2	—	35,469	35,469	1.58	1.62	0.11	35,991
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	4.11	3.87	2.13	23.1	0.06	0.03	6.91	6.94	0.02	1.75	1.78	—	5,719	5,719	0.25	0.26	0.28	5,802

Total	4.11	3.87	2.13	23.1	0.06	0.03	6.91	6.94	0.02	1.75	1.78	—	5,719	5,719	0.25	0.26	0.28	5,802
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## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	5,300	5,300	1.03	0.12	—	5,363
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,300	5,300	1.03	0.12	—	5,363
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	5,300	5,300	1.03	0.12	—	5,363
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,300	5,300	1.03	0.12	—	5,363
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	877	877	0.17	0.02	—	888
Total	—	—	—	—	—	—	—	—	—	—	—	—	877	877	0.17	0.02	—	888

### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------



Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	1.69	0.85	14.5	6.15	0.09	1.17	—	1.17	1.17	—	1.17	—	18,353	18,353	1.62	0.03	—	18,404
Total	1.69	0.85	14.5	6.15	0.09	1.17	—	1.17	1.17	—	1.17	—	18,353	18,353	1.62	0.03	—	18,404
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	1.69	0.85	14.5	6.15	0.09	1.17	—	1.17	1.17	—	1.17	—	18,353	18,353	1.62	0.03	—	18,404
Total	1.69	0.85	14.5	6.15	0.09	1.17	—	1.17	1.17	—	1.17	—	18,353	18,353	1.62	0.03	—	18,404
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	0.31	0.15	2.64	1.12	0.02	0.21	—	0.21	0.21	—	0.21	—	3,039	3,039	0.27	0.01	—	3,047
Total	0.31	0.15	2.64	1.12	0.02	0.21	—	0.21	0.21	—	0.21	—	3,039	3,039	0.27	0.01	—	3,047

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	3,774	3,711	72.5	4,583	8.30	631	—	631	629	—	629	67,374	28,095	95,469	62.2	4.83	—	98,464
Consumer Products	—	67.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	—	5.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	12.6	12.0	1.27	138	0.01	0.06	—	0.06	0.05	—	0.05	—	368	368	0.02	< 0.005	—	369
Total	3,787	3,796	73.8	4,721	8.31	631	—	631	629	—	629	67,374	28,463	95,837	62.2	4.84	—	98,833
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	3,774	3,711	72.5	4,583	8.30	631	—	631	629	—	629	67,374	28,095	95,469	62.2	4.83	—	98,464
Consumer Products	—	67.5	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	5.41	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	3,774	3,784	72.5	4,583	8.30	631	—	631	629	—	629	67,374	28,095	95,469	62.2	4.83	—	98,464
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	155	152	2.97	188	0.34	25.9	—	25.9	25.8	—	25.8	2,506	1,045	3,551	2.31	0.18	—	3,662
Consumer Products	—	12.3	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	0.99	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	1.14	1.08	0.11	12.4	< 0.005	0.01	—	0.01	< 0.005	—	< 0.005	—	30.0	30.0	< 0.005	< 0.005	—	30.2
Total	156	167	3.09	200	0.34	25.9	—	25.9	25.8	—	25.8	2,506	1,075	3,581	2.31	0.18	—	3,692

#### 4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	163	270	433	16.8	0.40	—	973
Total	—	—	—	—	—	—	—	—	—	—	—	163	270	433	16.8	0.40	—	973
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	163	270	433	16.8	0.40	—	973
Total	—	—	—	—	—	—	—	—	—	—	—	163	270	433	16.8	0.40	—	973
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	27.0	44.6	71.7	2.78	0.07	—	161
Total	—	—	—	—	—	—	—	—	—	—	—	27.0	44.6	71.7	2.78	0.07	—	161

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
----------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	967	0.00	967	96.6	0.00	—	3,383
Total	—	—	—	—	—	—	—	—	—	—	—	967	0.00	967	96.6	0.00	—	3,383
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	967	0.00	967	96.6	0.00	—	3,383
Total	—	—	—	—	—	—	—	—	—	—	—	967	0.00	967	96.6	0.00	—	3,383
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	160	0.00	160	16.0	0.00	—	560
Total	—	—	—	—	—	—	—	—	—	—	—	160	0.00	160	16.0	0.00	—	560

#### 4.6. Refrigerant Emissions by Land Use

##### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	22.6	22.6
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	22.6	22.6

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	22.6	22.6
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	22.6	22.6
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.74	3.74
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.74	3.74

#### 4.7. Offroad Emissions By Equipment Type

##### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 4.8. Stationary Emissions By Equipment Type

#### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 4.9. User Defined Emissions By Equipment Type

#### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

##### 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Mobile Home Park	12,130	11,184	10,286	4,281,977	56,006	51,638	47,493	19,770,624

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
-------------	----------------------

Mobile Home Park	—
Wood Fireplaces	849
Gas Fireplaces	1334
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	243
Conventional Wood Stoves	0
Catalytic Wood Stoves	121
Non-Catalytic Wood Stoves	121
Pellet Wood Stoves	0

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
6386445	2,128,815	0.00	0.00	—

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

## 5.11. Operational Energy Consumption

### 5.11.1. Unmitigated

#### Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Mobile Home Park	11,404,109	170	0.0330	0.0040	57,265,941

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Mobile Home Park	85,232,840	0.00

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Mobile Home Park	1,794	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Mobile Home Park	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Mobile Home Park	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------

## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
----------------	-----------	----------------	---------------	----------------	------------	-------------

### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
----------------	-----------	--------	--------------------------	------------------------------	------------------------------

## 5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
-----------	--------	------------------------------	------------------------------

## 8. User Changes to Default Data

# LUDU22 - Single Family Homes Custom Report

## Table of Contents

### 1. Basic Project Information

#### 1.1. Basic Project Information

#### 1.2. Land Use Types

#### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

#### 2.4. Operations Emissions Compared Against Thresholds

#### 2.5. Operations Emissions by Sector, Unmitigated

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

#### 4.2. Energy

##### 4.2.1. Electricity Emissions By Land Use - Unmitigated

##### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

#### 4.3. Area Emissions by Source



4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

#### 5.10.2. Architectural Coatings

#### 5.10.3. Landscape Equipment

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

### 5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	LUDU22 - Single Family Homes
Operational Year	2022
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Single Family Housing	28,815	Dwelling Unit	9,355	56,188,470	337,501,290	—	80,393	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	46,282	46,738	1,760	62,451	112	7,528	897	8,424	7,492	227	7,720	812,443	2,093,188	2,905,631	2,088	120	5,503	2,999,229
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	46,080	46,540	1,813	60,780	111	7,527	897	8,423	7,491	227	7,719	812,443	2,037,361	2,849,804	2,095	124	535	2,939,774
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	11,361	12,399	1,125	19,147	34.3	1,712	869	2,582	1,704	221	1,924	191,990	1,763,331	1,955,320	1,519	77.7	2,556	2,019,007
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2,073	2,263	205	3,494	6.27	312	159	471	311	40.3	351	31,786	291,939	323,726	251	12.9	423	334,270

### 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
--------	-----	-----	-----	----	-----	-------	-------	-------	--------	--------	--------	------	-------	------	-----	-----	---	------

LUDU22 - Single Family Homes Custom Report, 4/25/2024

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1,263	1,188	675	6,306	11.5	10.3	897	907	9.63	227	237	—	1,171,454	1,171,454	80.6	55.4	5,101	1,195,091
Area	44,995	45,538	878	56,056	98.7	7,500	—	7,500	7,466	—	7,466	800,231	338,065	1,138,296	739	57.5	—	1,173,881
Energy	24.3	12.1	207	88.3	1.32	16.8	—	16.8	16.8	—	16.8	—	525,088	525,088	39.3	2.44	—	526,796
Water	—	—	—	—	—	—	—	—	—	—	—	1,940	58,581	60,521	202	5.16	—	67,121
Waste	—	—	—	—	—	—	—	—	—	—	—	10,272	0.00	10,272	1,027	0.00	—	35,937
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	402	402
Total	46,282	46,738	1,760	62,451	112	7,528	897	8,424	7,492	227	7,720	812,443	2,093,188	2,905,631	2,088	120	5,503	2,999,229
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1,226	1,147	744	6,258	11.0	10.3	897	907	9.64	227	237	—	1,119,998	1,119,998	88.7	59.3	132	1,140,023
Area	44,830	45,381	861	54,434	98.6	7,500	—	7,500	7,465	—	7,465	800,231	333,694	1,133,926	738	57.4	—	1,169,495
Energy	24.3	12.1	207	88.3	1.32	16.8	—	16.8	16.8	—	16.8	—	525,088	525,088	39.3	2.44	—	526,796
Water	—	—	—	—	—	—	—	—	—	—	—	1,940	58,581	60,521	202	5.16	—	67,121
Waste	—	—	—	—	—	—	—	—	—	—	—	10,272	0.00	10,272	1,027	0.00	—	35,937
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	402	402
Total	46,080	46,540	1,813	60,780	111	7,527	897	8,423	7,491	227	7,719	812,443	2,037,361	2,849,804	2,095	124	535	2,939,774
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1,183	1,108	716	6,030	10.8	10.1	869	880	9.42	221	230	—	1,102,540	1,102,540	84.4	57.2	2,153	1,123,852
Area	10,153	11,280	202	13,029	22.2	1,685	—	1,685	1,677	—	1,677	179,778	77,122	256,900	166	12.9	—	264,899
Energy	24.3	12.1	207	88.3	1.32	16.8	—	16.8	16.8	—	16.8	—	525,088	525,088	39.3	2.44	—	526,796

Water	—	—	—	—	—	—	—	—	—	—	—	1,940	58,581	60,521	202	5.16	—	67,121
Waste	—	—	—	—	—	—	—	—	—	—	—	10,272	0.00	10,272	1,027	0.00	—	35,937
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	402	402
Total	11,361	12,399	1,125	19,147	34.3	1,712	869	2,582	1,704	221	1,924	191,990	1,763,331	1,955,320	1,519	77.7	2,556	2,019,007
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	216	202	131	1,100	1.98	1.84	159	161	1.72	40.3	42.0	—	182,538	182,538	14.0	9.47	357	186,067
Area	1,853	2,059	36.8	2,378	4.05	308	—	308	306	—	306	29,764	12,768	42,533	27.5	2.14	—	43,857
Energy	4.43	2.22	37.9	16.1	0.24	3.06	—	3.06	3.06	—	3.06	—	86,934	86,934	6.51	0.40	—	87,217
Water	—	—	—	—	—	—	—	—	—	—	—	321	9,699	10,020	33.5	0.85	—	11,113
Waste	—	—	—	—	—	—	—	—	—	—	—	1,701	0.00	1,701	170	0.00	—	5,950
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	66.6	66.6
Total	2,073	2,263	205	3,494	6.27	312	159	471	311	40.3	351	31,786	291,939	323,726	251	12.9	423	334,270

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	1,263	1,188	675	6,306	11.5	10.3	897	907	9.63	227	237	—	1,171,454	1,171,454	80.6	55.4	5,101	1,195,091
Total	1,263	1,188	675	6,306	11.5	10.3	897	907	9.63	227	237	—	1,171,454	1,171,454	80.6	55.4	5,101	1,195,091



Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	1,226	1,147	744	6,258	11.0	10.3	897	907	9.64	227	237	—	1,119,998	1,119,998	88.7	59.3	132	1,140,023
Total	1,226	1,147	744	6,258	11.0	10.3	897	907	9.64	227	237	—	1,119,998	1,119,998	88.7	59.3	132	1,140,023
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	216	202	131	1,100	1.98	1.84	159	161	1.72	40.3	42.0	—	182,538	182,538	14.0	9.47	357	186,067
Total	216	202	131	1,100	1.98	1.84	159	161	1.72	40.3	42.0	—	182,538	182,538	14.0	9.47	357	186,067

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	261,744	261,744	16.0	1.94	—	262,722
Total	—	—	—	—	—	—	—	—	—	—	—	—	261,744	261,744	16.0	1.94	—	262,722
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	261,744	261,744	16.0	1.94	—	262,722

Total	—	—	—	—	—	—	—	—	—	—	—	—	261,744	261,744	16.0	1.94	—	262,722
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	43,335	43,335	2.65	0.32	—	43,497
Total	—	—	—	—	—	—	—	—	—	—	—	—	43,335	43,335	2.65	0.32	—	43,497

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	24.3	12.1	207	88.3	1.32	16.8	—	16.8	16.8	—	16.8	—	263,344	263,344	23.3	0.50	—	264,074
Total	24.3	12.1	207	88.3	1.32	16.8	—	16.8	16.8	—	16.8	—	263,344	263,344	23.3	0.50	—	264,074
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	24.3	12.1	207	88.3	1.32	16.8	—	16.8	16.8	—	16.8	—	263,344	263,344	23.3	0.50	—	264,074
Total	24.3	12.1	207	88.3	1.32	16.8	—	16.8	16.8	—	16.8	—	263,344	263,344	23.3	0.50	—	264,074
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	4.43	2.22	37.9	16.1	0.24	3.06	—	3.06	3.06	—	3.06	—	43,600	43,600	3.86	0.08	—	43,721
Total	4.43	2.22	37.9	16.1	0.24	3.06	—	3.06	3.06	—	3.06	—	43,600	43,600	3.86	0.08	—	43,721

4.3. Area Emissions by Source

4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	44,830	44,082	861	54,434	98.6	7,500	—	7,500	7,465	—	7,465	800,231	333,694	1,133,926	738	57.4	—	1,169,495
Consumer Products	—	1,202	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	96.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	165	157	16.8	1,623	0.07	0.95	—	0.95	0.72	—	0.72	—	4,371	4,371	0.18	0.04	—	4,386
Total	44,995	45,538	878	56,056	98.7	7,500	—	7,500	7,466	—	7,466	800,231	338,065	1,138,296	739	57.5	—	1,173,881
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	44,830	44,082	861	54,434	98.6	7,500	—	7,500	7,465	—	7,465	800,231	333,694	1,133,926	738	57.4	—	1,169,495
Consumer Products	—	1,202	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	96.4	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	44,830	45,381	861	54,434	98.6	7,500	—	7,500	7,465	—	7,465	800,231	333,694	1,133,926	738	57.4	—	1,169,495
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Hearths	1,838	1,807	35.3	2,232	4.04	307	—	307	306	—	306	29,764	12,412	42,176	27.5	2.14	—	43,499
Consumer Products	—	219	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	17.6	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	14.9	14.1	1.51	146	0.01	0.09	—	0.09	0.06	—	0.06	—	357	357	0.01	< 0.005	—	358
Total	1,853	2,059	36.8	2,378	4.05	308	—	308	306	—	306	29,764	12,768	42,533	27.5	2.14	—	43,857

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,940	58,581	60,521	202	5.16	—	67,121
Total	—	—	—	—	—	—	—	—	—	—	—	1,940	58,581	60,521	202	5.16	—	67,121
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,940	58,581	60,521	202	5.16	—	67,121
Total	—	—	—	—	—	—	—	—	—	—	—	1,940	58,581	60,521	202	5.16	—	67,121

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	321	9,699	10,020	33.5	0.85	—	11,113
Total	—	—	—	—	—	—	—	—	—	—	—	321	9,699	10,020	33.5	0.85	—	11,113

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	10,272	0.00	10,272	1,027	0.00	—	35,937
Total	—	—	—	—	—	—	—	—	—	—	—	10,272	0.00	10,272	1,027	0.00	—	35,937
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	10,272	0.00	10,272	1,027	0.00	—	35,937
Total	—	—	—	—	—	—	—	—	—	—	—	10,272	0.00	10,272	1,027	0.00	—	35,937
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	1,701	0.00	1,701	170	0.00	—	5,950
Total	—	—	—	—	—	—	—	—	—	—	—	1,701	0.00	1,701	170	0.00	—	5,950

### 4.6. Refrigerant Emissions by Land Use

#### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	402	402
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	402	402
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	402	402
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	402	402
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	66.6	66.6
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	66.6	66.6

### 4.7. Offroad Emissions By Equipment Type

#### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Remove	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.9. Operational Mobile Sources

5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Single Family Housing	272,010	274,891	246,365	98,096,627	1,255,916	1,269,220	1,137,509	452,929,034

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Single Family Housing	—
Wood Fireplaces	10085
Gas Fireplaces	15848
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	2881
Conventional Wood Stoves	0
Catalytic Wood Stoves	1441
Non-Catalytic Wood Stoves	1441
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
113781651.75	37,927,217	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Single Family Housing	176,958,457	540	0.0330	0.0040	821,704,024

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Single Family Housing	1,012,345,503	6,164,491,073

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Single Family Housing	19,059	—

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
----------------	-----------	----------------	---------------	----------------	------------	-------------

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 8. User Changes to Default Data



# LUDU22 - Multi Family Residential Custom Report

## Table of Contents

### 1. Basic Project Information

#### 1.1. Basic Project Information

#### 1.2. Land Use Types

#### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

#### 2.4. Operations Emissions Compared Against Thresholds

#### 2.5. Operations Emissions by Sector, Unmitigated

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

#### 4.2. Energy

##### 4.2.1. Electricity Emissions By Land Use - Unmitigated

##### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

#### 4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

5. Activity Data

5.9. Operational Mobile Sources

5.9.1. Unmitigated

5.10. Operational Area Sources

5.10.1. Hearths

5.10.1.1. Unmitigated

5.10.2. Architectural Coatings

5.10.3. Landscape Equipment

5.11. Operational Energy Consumption

5.11.1. Unmitigated

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

5.13. Operational Waste Generation

5.13.1. Unmitigated

5.14. Operational Refrigeration and Air Conditioning Equipment

5.14.1. Unmitigated

5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	LUDU22 - Multi Family Residential
Operational Year	2022
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments High Rise	260,067	Dwelling Unit	4,195	249,664,320	0.00	—	725,587	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	411,569	410,170	11,281	533,164	943	67,778	3,842	71,620	67,461	975	68,436	7,343,663	10,058,069	17,401,732	19,303	810	23,648	18,149,411
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	409,919	408,580	11,425	518,311	940	67,769	3,842	71,611	67,455	975	68,430	7,343,663	9,798,094	17,141,757	19,336	827	2,355	17,873,816
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	96,657	100,530	5,293	143,108	249	15,291	3,650	18,941	15,217	926	16,143	1,743,744	7,311,176	9,054,920	14,144	411	10,828	9,541,792
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	17,640	18,347	966	26,117	45.4	2,791	666	3,457	2,777	169	2,946	288,697	1,210,449	1,499,145	2,342	68.0	1,793	1,579,753

### 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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LUDU22 - Multi Family Residential Custom Report, 4/25/2024

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5,411	5,090	2,892	27,027	49.3	44.2	3,842	3,887	41.3	975	1,016	—	5,020,510	5,020,510	345	238	21,860	5,121,812
Area	406,103	405,053	7,924	505,938	891	67,696	—	67,696	67,382	—	67,382	7,222,510	3,051,216	10,273,727	6,665	519	—	10,594,898
Energy	54.4	27.2	465	198	2.97	37.6	—	37.6	37.6	—	37.6	—	1,894,343	1,894,343	132	10.8	—	1,900,853
Water	—	—	—	—	—	—	—	—	—	—	—	17,509	91,999	109,508	1,801	43.3	—	167,445
Waste	—	—	—	—	—	—	—	—	—	—	—	103,644	0.00	103,644	10,359	0.00	—	362,615
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,788	1,788
Total	411,569	410,170	11,281	533,164	943	67,778	3,842	71,620	67,461	975	68,436	7,343,663	10,058,069	17,401,732	19,303	810	23,648	18,149,411
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	5,253	4,915	3,188	26,819	47.2	44.2	3,842	3,887	41.3	975	1,016	—	4,799,984	4,799,984	380	254	567	4,885,805
Area	404,612	403,637	7,773	491,294	890	67,687	—	67,687	67,376	—	67,376	7,222,510	3,011,767	10,234,278	6,664	518	—	10,555,310
Energy	54.4	27.2	465	198	2.97	37.6	—	37.6	37.6	—	37.6	—	1,894,343	1,894,343	132	10.8	—	1,900,853
Water	—	—	—	—	—	—	—	—	—	—	—	17,509	91,999	109,508	1,801	43.3	—	167,445
Waste	—	—	—	—	—	—	—	—	—	—	—	103,644	0.00	103,644	10,359	0.00	—	362,615
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,788	1,788
Total	409,919	408,580	11,425	518,311	940	67,769	3,842	71,611	67,455	975	68,430	7,343,663	9,798,094	17,141,757	19,336	827	2,355	17,873,816
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	4,968	4,650	3,007	25,316	45.5	42.3	3,650	3,693	39.5	926	966	—	4,628,763	4,628,763	354	240	9,040	4,718,239



Area	91,634	95,853	1,821	117,595	200	15,211	—	15,211	15,140	—	15,140	1,622,591	696,070	2,318,662	1,498	117	—	2,390,853
Energy	54.4	27.2	465	198	2.97	37.6	—	37.6	37.6	—	37.6	—	1,894,343	1,894,343	132	10.8	—	1,900,853
Water	—	—	—	—	—	—	—	—	—	—	—	17,509	91,999	109,508	1,801	43.3	—	167,445
Waste	—	—	—	—	—	—	—	—	—	—	—	103,644	0.00	103,644	10,359	0.00	—	362,615
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,788	1,788
Total	96,657	100,530	5,293	143,108	249	15,291	3,650	18,941	15,217	926	16,143	1,743,744	7,311,176	9,054,920	14,144	411	10,828	9,541,792
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	907	849	549	4,620	8.30	7.72	666	674	7.22	169	176	—	766,345	766,345	58.7	39.8	1,497	781,158
Area	16,723	17,493	332	21,461	36.6	2,776	—	2,776	2,763	—	2,763	268,639	115,242	383,881	248	19.3	—	395,833
Energy	9.93	4.96	84.8	36.1	0.54	6.86	—	6.86	6.86	—	6.86	—	313,630	313,630	21.8	1.78	—	314,708
Water	—	—	—	—	—	—	—	—	—	—	—	2,899	15,231	18,130	298	7.18	—	27,722
Waste	—	—	—	—	—	—	—	—	—	—	—	17,159	0.00	17,159	1,715	0.00	—	60,035
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	296	296
Total	17,640	18,347	966	26,117	45.4	2,791	666	3,457	2,777	169	2,946	288,697	1,210,449	1,499,145	2,342	68.0	1,793	1,579,753

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartme High Rise	5,411	5,090	2,892	27,027	49.3	44.2	3,842	3,887	41.3	975	1,016	—	5,020,51	5,020,51	345	238	21,860	5,121,81
Total	5,411	5,090	2,892	27,027	49.3	44.2	3,842	3,887	41.3	975	1,016	—	5,020,51 0	5,020,51 0	345	238	21,860	5,121,81 2
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	5,253	4,915	3,188	26,819	47.2	44.2	3,842	3,887	41.3	975	1,016	—	4,799,98 4	4,799,98 4	380	254	567	4,885,80 5
Total	5,253	4,915	3,188	26,819	47.2	44.2	3,842	3,887	41.3	975	1,016	—	4,799,98 4	4,799,98 4	380	254	567	4,885,80 5
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	907	849	549	4,620	8.30	7.72	666	674	7.22	169	176	—	766,345	766,345	58.7	39.8	1,497	781,158
Total	907	849	549	4,620	8.30	7.72	666	674	7.22	169	176	—	766,345	766,345	58.7	39.8	1,497	781,158

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	—	—	—	—	—	—	—	—	—	—	—	—	1,304,37 2	1,304,37 2	79.7	9.66	—	1,309,24 6
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,304,37 2	1,304,37 2	79.7	9.66	—	1,309,24 6

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	1,304,372	1,304,372	79.7	9.66	—	1,309,246
Total	—	—	—	—	—	—	—	—	—	—	—	—	1,304,372	1,304,372	79.7	9.66	—	1,309,246
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	215,954	215,954	13.2	1.60	—	216,761
Total	—	—	—	—	—	—	—	—	—	—	—	—	215,954	215,954	13.2	1.60	—	216,761

#### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	54.4	27.2	465	198	2.97	37.6	—	37.6	37.6	—	37.6	—	589,971	589,971	52.2	1.11	—	591,607
Total	54.4	27.2	465	198	2.97	37.6	—	37.6	37.6	—	37.6	—	589,971	589,971	52.2	1.11	—	591,607
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	54.4	27.2	465	198	2.97	37.6	—	37.6	37.6	—	37.6	—	589,971	589,971	52.2	1.11	—	591,607
Total	54.4	27.2	465	198	2.97	37.6	—	37.6	37.6	—	37.6	—	589,971	589,971	52.2	1.11	—	591,607
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartme High Rise	9.93	4.96	84.8	36.1	0.54	6.86	—	6.86	6.86	—	6.86	—	97,676	97,676	8.64	0.18	—	97,947
Total	9.93	4.96	84.8	36.1	0.54	6.86	—	6.86	6.86	—	6.86	—	97,676	97,676	8.64	0.18	—	97,947

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	404,612	397,866	7,773	491,294	890	67,687	—	67,687	67,376	—	67,376	7,222,510	3,011,767	10,234,278	6,664	518	—	10,555,310
Consumer Products	—	5,343	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architect ural Coatings	—	428	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipme nt	1,491	1,416	151	14,644	0.64	8.60	—	8.60	6.49	—	6.49	—	39,449	39,449	1.65	0.33	—	39,588
Total	406,103	405,053	7,924	505,938	891	67,696	—	67,696	67,382	—	67,382	7,222,510	3,051,216	10,273,727	6,665	519	—	10,594,898
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	404,612	397,866	7,773	491,294	890	67,687	—	67,687	67,376	—	67,376	7,222,510	3,011,767	10,234,278	6,664	518	—	10,555,310

Consumer Products	—	5,343	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	428	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	404,612	403,637	7,773	491,294	890	67,687	—	67,687	67,376	—	67,376	7,222,510	3,011,767	10,234,278	6,664	518	—	10,555,310
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	16,589	16,313	319	20,143	36.5	2,775	—	2,775	2,762	—	2,762	268,639	112,022	380,660	248	19.3	—	392,601
Consumer Products	—	975	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	78.1	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	134	127	13.6	1,318	0.06	0.77	—	0.77	0.58	—	0.58	—	3,221	3,221	0.13	0.03	—	3,232
Total	16,723	17,493	332	21,461	36.6	2,776	—	2,776	2,763	—	2,763	268,639	115,242	383,881	248	19.3	—	395,833

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	17,509	91,999	109,508	1,801	43.3	—	167,445

Total	—	—	—	—	—	—	—	—	—	—	—	17,509	91,999	109,508	1,801	43.3	—	167,445
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	17,509	91,999	109,508	1,801	43.3	—	167,445
Total	—	—	—	—	—	—	—	—	—	—	—	17,509	91,999	109,508	1,801	43.3	—	167,445
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	2,899	15,231	18,130	298	7.18	—	27,722
Total	—	—	—	—	—	—	—	—	—	—	—	2,899	15,231	18,130	298	7.18	—	27,722

#### 4.5. Waste Emissions by Land Use

##### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	103,644	0.00	103,644	10,359	0.00	—	362,615
Total	—	—	—	—	—	—	—	—	—	—	—	103,644	0.00	103,644	10,359	0.00	—	362,615
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	103,644	0.00	103,644	10,359	0.00	—	362,615

Total	—	—	—	—	—	—	—	—	—	—	—	—	103,644	0.00	103,644	10,359	0.00	—	362,615
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	17,159	0.00	17,159	1,715	0.00	—	60,035
Total	—	—	—	—	—	—	—	—	—	—	—	—	17,159	0.00	17,159	1,715	0.00	—	60,035

## 4.6. Refrigerant Emissions by Land Use

### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,788	1,788
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,788	1,788
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,788	1,788
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1,788	1,788
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	296	296
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	296	296



### 4.7. Offroad Emissions By Equipment Type

#### 4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 4.8. Stationary Emissions By Equipment Type

#### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.9. User Defined Emissions By Equipment Type

##### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments High Rise	1,157,298	1,178,104	933,641	411,836,517	5,343,445	5,439,507	4,310,779	1,901,520,177

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments High Rise	—
Wood Fireplaces	91023
Gas Fireplaces	143037
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	26007
Conventional Wood Stoves	0
Catalytic Wood Stoves	13003
Non-Catalytic Wood Stoves	13003
Pellet Wood Stoves	0

#### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
505570248	168,523,416	0.00	0.00	—

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments High Rise	881,853,368	540	0.0330	0.0040	1,840,867,695

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments High Rise	9,136,953,416	0.00

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments High Rise	192,311	—

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

### 5.15. Operational Off-Road Equipment

#### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
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### 5.16. Stationary Sources

#### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
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#### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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### 5.17. User Defined

Equipment Type	Fuel Type
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## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
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### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
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### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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## 8. User Changes to Default Data

# LUDU22 - Mobile Homes Custom Report

## Table of Contents

### 1. Basic Project Information

#### 1.1. Basic Project Information

#### 1.2. Land Use Types

#### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

#### 2.4. Operations Emissions Compared Against Thresholds

#### 2.5. Operations Emissions by Sector, Unmitigated

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

#### 4.2. Energy

##### 4.2.1. Electricity Emissions By Land Use - Unmitigated

##### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

#### 4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

#### 5.10.2. Architectural Coatings

#### 5.10.3. Landscape Equipment

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

### 5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	LUDU22 - Mobile Homes
Operational Year	2022
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Mobile Home Park	4,872	Dwelling Unit	614	6,333,600	0.00	—	13,593	—

1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

2. Emissions Summary

2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7,723	7,733	237	10,049	17.9	1,271	79.4	1,351	1,266	20.2	1,286	137,574	233,427	371,000	365	15.8	497	385,323
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	7,692	7,703	241	9,771	17.8	1,271	79.4	1,351	1,265	20.2	1,286	137,574	228,128	365,701	366	16.1	57.1	379,701
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1,824	1,933	126	2,744	4.89	288	76.2	364	287	19.3	306	32,667	182,146	214,812	269	8.33	234	224,244
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	333	353	23.0	501	0.89	52.6	13.9	66.5	52.3	3.53	55.9	5,408	30,156	35,565	44.5	1.38	38.8	37,126

2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



LUDU22 - Mobile Homes Custom Report, 4/25/2024

Mobile	112	105	59.8	559	1.02	0.91	79.4	80.4	0.85	20.2	21.0	—	103,811	103,811	7.14	4.91	452	105,905
Area	7,608	7,626	148	9,478	16.7	1,268	—	1,268	1,262	—	1,262	135,304	57,160	192,464	125	9.71	—	198,481
Energy	3.40	1.70	29.0	12.4	0.19	2.35	—	2.35	2.35	—	2.35	—	70,732	70,732	5.33	0.32	—	70,961
Water	—	—	—	—	—	—	—	—	—	—	—	328	1,723	2,051	33.7	0.81	—	3,137
Waste	—	—	—	—	—	—	—	—	—	—	—	1,942	0.00	1,942	194	0.00	—	6,793
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	45.4	45.4
Total	7,723	7,733	237	10,049	17.9	1,271	79.4	1,351	1,266	20.2	1,286	137,574	233,427	371,000	365	15.8	497	385,323
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	109	102	65.9	555	0.97	0.91	79.4	80.4	0.85	20.2	21.0	—	99,251	99,251	7.86	5.26	11.7	101,025
Area	7,580	7,600	146	9,204	16.7	1,268	—	1,268	1,262	—	1,262	135,304	56,421	191,725	125	9.71	—	197,739
Energy	3.40	1.70	29.0	12.4	0.19	2.35	—	2.35	2.35	—	2.35	—	70,732	70,732	5.33	0.32	—	70,961
Water	—	—	—	—	—	—	—	—	—	—	—	328	1,723	2,051	33.7	0.81	—	3,137
Waste	—	—	—	—	—	—	—	—	—	—	—	1,942	0.00	1,942	194	0.00	—	6,793
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	45.4	45.4
Total	7,692	7,703	241	9,771	17.8	1,271	79.4	1,351	1,265	20.2	1,286	137,574	228,128	365,701	366	16.1	57.1	379,701
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	104	97.1	62.8	529	0.95	0.88	76.2	77.1	0.83	19.3	20.2	—	96,650	96,650	7.40	5.02	189	98,518
Area	1,717	1,834	34.1	2,203	3.75	285	—	285	284	—	284	30,397	13,040	43,437	28.1	2.18	—	44,789
Energy	3.40	1.70	29.0	12.4	0.19	2.35	—	2.35	2.35	—	2.35	—	70,732	70,732	5.33	0.32	—	70,961
Water	—	—	—	—	—	—	—	—	—	—	—	328	1,723	2,051	33.7	0.81	—	3,137
Waste	—	—	—	—	—	—	—	—	—	—	—	1,942	0.00	1,942	194	0.00	—	6,793
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	45.4	45.4
Total	1,824	1,933	126	2,744	4.89	288	76.2	364	287	19.3	306	32,667	182,146	214,812	269	8.33	234	224,244
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	18.9	17.7	11.5	96.5	0.17	0.16	13.9	14.1	0.15	3.53	3.68	—	16,001	16,001	1.23	0.83	31.3	16,311
Area	313	335	6.22	402	0.68	52.0	—	52.0	51.8	—	51.8	5,033	2,159	7,191	4.65	0.36	—	7,415

Energy	0.62	0.31	5.30	2.25	0.03	0.43	—	0.43	0.43	—	0.43	—	11,711	11,711	0.88	0.05	—	11,748
Water	—	—	—	—	—	—	—	—	—	—	—	54.3	285	340	5.59	0.13	—	519
Waste	—	—	—	—	—	—	—	—	—	—	—	321	0.00	321	32.1	0.00	—	1,125
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.51	7.51
Total	333	353	23.0	501	0.89	52.6	13.9	66.5	52.3	3.53	55.9	5,408	30,156	35,565	44.5	1.38	38.8	37,126

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	112	105	59.8	559	1.02	0.91	79.4	80.4	0.85	20.2	21.0	—	103,811	103,811	7.14	4.91	452	105,905
Total	112	105	59.8	559	1.02	0.91	79.4	80.4	0.85	20.2	21.0	—	103,811	103,811	7.14	4.91	452	105,905
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	109	102	65.9	555	0.97	0.91	79.4	80.4	0.85	20.2	21.0	—	99,251	99,251	7.86	5.26	11.7	101,025
Total	109	102	65.9	555	0.97	0.91	79.4	80.4	0.85	20.2	21.0	—	99,251	99,251	7.86	5.26	11.7	101,025
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	18.9	17.7	11.5	96.5	0.17	0.16	13.9	14.1	0.15	3.53	3.68	—	16,001	16,001	1.23	0.83	31.3	16,311

Total	18.9	17.7	11.5	96.5	0.17	0.16	13.9	14.1	0.15	3.53	3.68	—	16,001	16,001	1.23	0.83	31.3	16,311
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### 4.2. Energy

#### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	33,875	33,875	2.07	0.25	—	34,002
Total	—	—	—	—	—	—	—	—	—	—	—	—	33,875	33,875	2.07	0.25	—	34,002
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	33,875	33,875	2.07	0.25	—	34,002
Total	—	—	—	—	—	—	—	—	—	—	—	—	33,875	33,875	2.07	0.25	—	34,002
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	5,608	5,608	0.34	0.04	—	5,629
Total	—	—	—	—	—	—	—	—	—	—	—	—	5,608	5,608	0.34	0.04	—	5,629

#### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	3.40	1.70	29.0	12.4	0.19	2.35	—	2.35	2.35	—	2.35	—	36,857	36,857	3.26	0.07	—	36,959
Total	3.40	1.70	29.0	12.4	0.19	2.35	—	2.35	2.35	—	2.35	—	36,857	36,857	3.26	0.07	—	36,959
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	3.40	1.70	29.0	12.4	0.19	2.35	—	2.35	2.35	—	2.35	—	36,857	36,857	3.26	0.07	—	36,959
Total	3.40	1.70	29.0	12.4	0.19	2.35	—	2.35	2.35	—	2.35	—	36,857	36,857	3.26	0.07	—	36,959
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	0.62	0.31	5.30	2.25	0.03	0.43	—	0.43	0.43	—	0.43	—	6,102	6,102	0.54	0.01	—	6,119
Total	0.62	0.31	5.30	2.25	0.03	0.43	—	0.43	0.43	—	0.43	—	6,102	6,102	0.54	0.01	—	6,119

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	7,580	7,453	146	9,204	16.7	1,268	—	1,268	1,262	—	1,262	135,304	56,421	191,725	125	9.71	—	197,739
Consumer Products	—	136	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Architectural	—	10.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	27.9	26.5	2.83	274	0.01	0.16	—	0.16	0.12	—	0.12	—	739	739	0.03	0.01	—	742
Total	7,608	7,626	148	9,478	16.7	1,268	—	1,268	1,262	—	1,262	135,304	57,160	192,464	125	9.71	—	198,481
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	7,580	7,453	146	9,204	16.7	1,268	—	1,268	1,262	—	1,262	135,304	56,421	191,725	125	9.71	—	197,739
Consumer Products	—	136	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	10.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	7,580	7,600	146	9,204	16.7	1,268	—	1,268	1,262	—	1,262	135,304	56,421	191,725	125	9.71	—	197,739
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	311	306	5.97	377	0.68	52.0	—	52.0	51.8	—	51.8	5,033	2,099	7,131	4.64	0.36	—	7,355
Consumer Products	—	24.7	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	1.98	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	2.51	2.39	0.25	24.7	< 0.005	0.01	—	0.01	0.01	—	0.01	—	60.3	60.3	< 0.005	< 0.005	—	60.6
Total	313	335	6.22	402	0.68	52.0	—	52.0	51.8	—	51.8	5,033	2,159	7,191	4.65	0.36	—	7,415

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	328	1,723	2,051	33.7	0.81	—	3,137
Total	—	—	—	—	—	—	—	—	—	—	—	328	1,723	2,051	33.7	0.81	—	3,137
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	328	1,723	2,051	33.7	0.81	—	3,137
Total	—	—	—	—	—	—	—	—	—	—	—	328	1,723	2,051	33.7	0.81	—	3,137
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	54.3	285	340	5.59	0.13	—	519
Total	—	—	—	—	—	—	—	—	—	—	—	54.3	285	340	5.59	0.13	—	519

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	1,942	0.00	1,942	194	0.00	—	6,793
Total	—	—	—	—	—	—	—	—	—	—	—	1,942	0.00	1,942	194	0.00	—	6,793
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	1,942	0.00	1,942	194	0.00	—	6,793
Total	—	—	—	—	—	—	—	—	—	—	—	1,942	0.00	1,942	194	0.00	—	6,793
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	321	0.00	321	32.1	0.00	—	1,125
Total	—	—	—	—	—	—	—	—	—	—	—	321	0.00	321	32.1	0.00	—	1,125

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	45.4	45.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	45.4	45.4



Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	45.4	45.4
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	45.4	45.4
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile Home Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.51	7.51
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.51	7.51

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 4.8. Stationary Emissions By Equipment Type

#### 4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

### 4.9. User Defined Emissions By Equipment Type

#### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Mobile Home Park	24,360	22,460	20,657	8,599,254	112,474	103,701	95,378	39,704,238

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
-------------	----------------------

Mobile Home Park	—
Wood Fireplaces	1705
Gas Fireplaces	2680
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	487
Conventional Wood Stoves	0
Catalytic Wood Stoves	244
Non-Catalytic Wood Stoves	244
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
12825540	4,275,180	0.00	0.00	—

5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Mobile Home Park	22,902,233	540	0.0330	0.0040	115,003,983

## 5.12. Operational Water and Wastewater Consumption

### 5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Mobile Home Park	171,168,341	0.00

## 5.13. Operational Waste Generation

### 5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Mobile Home Park	3,603	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Mobile Home Park	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Mobile Home Park	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------



5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
----------------	-----------	----------------	---------------	----------------	------------	-------------

5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
----------------	-----------	--------	--------------------------	------------------------------	------------------------------

5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
-----------	--------	------------------------------	------------------------------

## 8. User Changes to Default Data

# University CPU - Change from Existing Uses Custom Report

## Table of Contents

### 1. Basic Project Information

#### 1.1. Basic Project Information

#### 1.2. Land Use Types

#### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

#### 2.4. Operations Emissions Compared Against Thresholds

#### 2.5. Operations Emissions by Sector, Unmitigated

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

#### 4.2. Energy

##### 4.2.1. Electricity Emissions By Land Use - Unmitigated

##### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

#### 4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

#### 5.10.2. Architectural Coatings

#### 5.10.3. Landscape Equipment

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

### 5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	University CPU - Change from Existing Uses
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments High Rise	30,430	Dwelling Unit	491	29,212,800	0.00	—	84,900	—



Single Family Housing	50.0	Dwelling Unit	16.2	97,500	585,643	—	139	—
Industrial Park	16,643	1000sqft	382	16,643,000	0.00	—	—	—
Office Park	18,057	1000sqft	415	18,057,000	0.00	—	—	—
Strip Mall	6,236	1000sqft	143	6,236,000	0.00	—	—	—
General Office Building	940	1000sqft	21.6	940,000	0.00	—	—	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	49,439	50,109	2,131	72,609	140	7,979	3,667	11,645	7,940	929	8,870	899,582	4,569,526	5,469,108	6,352	230	5,007	5,701,462
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	48,952	49,655	2,186	68,249	138	7,975	3,667	11,641	7,937	929	8,867	899,582	4,402,059	5,301,641	6,357	237	4,637	5,535,796
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	12,206	13,522	1,356	23,963	53.3	1,824	3,126	4,950	1,814	792	2,607	243,268	3,701,934	3,945,202	5,735	171	4,768	4,144,413

Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	2,228	2,468	247	4,373	9.72	333	571	903	331	145	476	40,276	612,897	653,173	949	28.4	789	686,155

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1,494	1,381	821	11,183	33.3	13.3	3,667	3,680	12.4	929	942	—	3,384,276	3,384,276	108	119	380	3,422,679
Area	47,904	48,707	942	61,139	105	7,937	—	7,937	7,900	—	7,900	846,482	365,094	1,211,576	782	60.8	—	1,249,244
Energy	40.9	20.5	369	287	2.23	28.3	—	28.3	28.3	—	28.3	—	792,422	792,422	107	9.05	—	797,797
Water	—	—	—	—	—	—	—	—	—	—	—	16,782	27,734	44,516	1,726	41.5	—	100,050
Waste	—	—	—	—	—	—	—	—	—	—	—	36,318	0.00	36,318	3,630	0.00	—	127,063
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,627	4,627
Total	49,439	50,109	2,131	72,609	140	7,979	3,667	11,645	7,940	929	8,870	899,582	4,569,526	5,469,108	6,352	230	5,007	5,701,462
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1,490	1,378	906	10,383	31.7	13.3	3,667	3,680	12.4	929	942	—	3,228,922	3,228,922	113	126	9.84	3,269,169
Area	47,421	48,257	911	57,580	104	7,933	—	7,933	7,897	—	7,897	846,482	352,981	1,199,463	781	60.7	—	1,237,088
Energy	40.9	20.5	369	287	2.23	28.3	—	28.3	28.3	—	28.3	—	792,422	792,422	107	9.05	—	797,797
Water	—	—	—	—	—	—	—	—	—	—	—	16,782	27,734	44,516	1,726	41.5	—	100,050
Waste	—	—	—	—	—	—	—	—	—	—	—	36,318	0.00	36,318	3,630	0.00	—	127,063
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,627	4,627

Total	48,952	49,655	2,186	68,249	138	7,975	3,667	11,641	7,937	929	8,867	899,582	4,402,054	5,301,644	6,357	237	4,637	5,535,798
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	1,274	1,177	767	8,986	27.5	11.4	3,126	3,138	10.7	792	803	—	2,796,504	2,796,504	96.1	107	141	2,830,958
Area	10,892	12,324	220	14,691	23.5	1,784	—	1,784	1,776	—	1,776	190,169	85,273	275,442	176	13.7	—	283,916
Energy	40.9	20.5	369	287	2.23	28.3	—	28.3	28.3	—	28.3	—	792,422	792,422	107	9.05	—	797,797
Water	—	—	—	—	—	—	—	—	—	—	—	16,782	27,734	44,516	1,726	41.5	—	100,050
Waste	—	—	—	—	—	—	—	—	—	—	—	36,318	0.00	36,318	3,630	0.00	—	127,063
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,627	4,627
Total	12,206	13,522	1,356	23,963	53.3	1,824	3,126	4,950	1,814	792	2,607	243,268	3,701,934	3,945,202	5,735	171	4,768	4,144,413
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	232	215	140	1,640	5.02	2.08	571	573	1.95	145	147	—	462,993	462,993	15.9	17.7	23.3	468,697
Area	1,988	2,249	40.2	2,681	4.29	326	—	326	324	—	324	31,485	14,118	45,603	29.1	2.27	—	47,006
Energy	7.47	3.73	67.3	52.4	0.41	5.16	—	5.16	5.16	—	5.16	—	131,195	131,195	17.7	1.50	—	132,084
Water	—	—	—	—	—	—	—	—	—	—	—	2,778	4,592	7,370	286	6.88	—	16,564
Waste	—	—	—	—	—	—	—	—	—	—	—	6,013	0.00	6,013	601	0.00	—	21,037
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	766	766
Total	2,228	2,468	247	4,373	9.72	333	571	903	331	145	476	40,276	612,897	653,173	949	28.4	789	686,155

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
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University CPU - Change from Existing Uses Custom Report, 4/25/2024

Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	269	253	127	1,544	4.15	1.72	449	451	1.61	114	115	—	421,971	421,971	16.7	17.3	46.5	427,596
Single Family Housing	0.93	0.88	0.44	5.34	0.01	0.01	1.55	1.56	0.01	0.39	0.40	—	1,460	1,460	0.06	0.06	0.16	1,480
Industrial Park	127	117	71.8	998	3.02	1.19	333	334	1.12	84.4	85.6	—	306,668	306,668	9.40	10.5	34.5	310,061
Office Park	452	416	256	3,556	10.7	4.26	1,187	1,192	3.98	301	305	—	1,092,949	1,092,949	33.5	37.4	123	1,105,042
Strip Mall	625	575	354	4,917	14.9	5.89	1,642	1,647	5.51	416	422	—	1,511,168	1,511,168	46.3	51.7	170	1,527,887
General Office Building	20.7	19.1	11.7	163	0.49	0.20	54.4	54.6	0.18	13.8	14.0	—	50,060	50,060	1.53	1.71	5.63	50,614
Total	1,494	1,381	821	11,183	33.3	13.3	3,667	3,680	12.4	929	942	—	3,384,276	3,384,276	108	119	380	3,422,679
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	269	254	140	1,493	3.96	1.72	449	451	1.61	114	115	—	403,072	403,072	18.0	18.4	1.20	409,008
Single Family Housing	0.93	0.88	0.49	5.17	0.01	0.01	1.55	1.56	0.01	0.39	0.40	—	1,395	1,395	0.06	0.06	< 0.005	1,415
Industrial Park	126	116	79.3	920	2.88	1.20	333	334	1.12	84.4	85.6	—	292,541	292,541	9.81	11.1	0.89	296,093
Office Park	450	415	283	3,280	10.3	4.26	1,187	1,192	3.99	301	305	—	1,042,603	1,042,603	35.0	39.5	3.19	1,055,261
Strip Mall	623	573	391	4,535	14.2	5.89	1,642	1,647	5.51	416	422	—	1,441,556	1,441,556	48.3	54.7	4.41	1,459,058

General Office Building	20.6	19.0	12.9	150	0.47	0.20	54.4	54.6	0.18	13.8	14.0	—	47,754	47,754	1.60	1.81	0.15	48,334
Total	1,490	1,378	906	10,383	31.7	13.3	3,667	3,680	12.4	929	942	—	3,228,922	3,228,922	113	126	9.84	3,269,169
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	46.3	43.6	23.9	259	0.70	0.30	77.8	78.1	0.28	19.7	20.0	—	64,361	64,361	2.79	2.88	3.18	65,293
Single Family Housing	0.16	0.15	0.08	0.92	< 0.005	< 0.005	0.27	0.28	< 0.005	0.07	0.07	—	227	227	0.01	0.01	0.01	231
Industrial Park	19.9	18.3	12.4	148	0.46	0.19	52.7	52.9	0.18	13.4	13.5	—	42,665	42,665	1.40	1.59	2.16	43,176
Office Park	60.5	55.6	37.7	449	1.40	0.58	160	161	0.54	40.6	41.1	—	129,582	129,582	4.26	4.83	6.55	131,133
Strip Mall	103	94.5	64.1	762	2.39	0.98	272	273	0.92	69.0	69.9	—	220,129	220,129	7.24	8.20	11.1	222,764
General Office Building	2.81	2.59	1.75	20.9	0.07	0.03	7.45	7.48	0.03	1.89	1.91	—	6,028	6,028	0.20	0.22	0.30	6,101
Total	232	215	140	1,640	5.02	2.08	571	573	1.95	145	147	—	462,993	462,993	15.9	17.7	23.3	468,697

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

University CPU - Change from Existing Uses Custom Report, 4/25/2024

Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	47,955	47,955	9.33	1.13	—	48,526
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	143	143	0.03	< 0.005	—	144
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	128,358	128,358	25.0	3.03	—	129,884
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	139,263	139,263	27.1	3.28	—	140,919
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	25,546	25,546	4.97	0.60	—	25,850
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	7,250	7,250	1.41	0.17	—	7,336
Total	—	—	—	—	—	—	—	—	—	—	—	—	348,515	348,515	67.8	8.22	—	352,659
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	47,955	47,955	9.33	1.13	—	48,526
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	143	143	0.03	< 0.005	—	144
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	128,358	128,358	25.0	3.03	—	129,884
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	139,263	139,263	27.1	3.28	—	140,919
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	25,546	25,546	4.97	0.60	—	25,850
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	7,250	7,250	1.41	0.17	—	7,336
Total	—	—	—	—	—	—	—	—	—	—	—	—	348,515	348,515	67.8	8.22	—	352,659
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartme High Rise	—	—	—	—	—	—	—	—	—	—	—	—	7,940	7,940	1.54	0.19	—	8,034
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	23.6	23.6	< 0.005	< 0.005	—	23.9
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	21,251	21,251	4.13	0.50	—	21,504
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	23,057	23,057	4.49	0.54	—	23,331
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	4,230	4,230	0.82	0.10	—	4,280
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	1,200	1,200	0.23	0.03	—	1,215
Total	—	—	—	—	—	—	—	—	—	—	—	—	57,701	57,701	11.2	1.36	—	58,387

4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	6.36	3.18	54.4	23.1	0.35	4.40	—	4.40	4.40	—	4.40	—	69,032	69,032	6.11	0.13	—	69,223
Single Family Housing	0.04	0.02	0.36	0.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	457	457	0.04	< 0.005	—	458
Industrial Park	15.7	7.87	143	120	0.86	10.9	—	10.9	10.9	—	10.9	—	170,806	170,806	15.1	0.32	—	171,279
Office Park	17.1	8.54	155	130	0.93	11.8	—	11.8	11.8	—	11.8	—	185,317	185,317	16.4	0.35	—	185,831
Strip Mall	0.80	0.40	7.25	6.09	0.04	0.55	—	0.55	0.55	—	0.55	—	8,649	8,649	0.77	0.02	—	8,673

University CPU - Change from Existing Uses Custom Report, 4/25/2024

General Office Building	0.89	0.44	8.09	6.79	0.05	0.61	—	0.61	0.61	—	0.61	—	9,647	9,647	0.85	0.02	—	9,674
Total	40.9	20.5	369	287	2.23	28.3	—	28.3	28.3	—	28.3	—	443,907	443,907	39.3	0.84	—	445,138
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	6.36	3.18	54.4	23.1	0.35	4.40	—	4.40	4.40	—	4.40	—	69,032	69,032	6.11	0.13	—	69,223
Single Family Housing	0.04	0.02	0.36	0.15	< 0.005	0.03	—	0.03	0.03	—	0.03	—	457	457	0.04	< 0.005	—	458
Industrial Park	15.7	7.87	143	120	0.86	10.9	—	10.9	10.9	—	10.9	—	170,806	170,806	15.1	0.32	—	171,279
Office Park	17.1	8.54	155	130	0.93	11.8	—	11.8	11.8	—	11.8	—	185,317	185,317	16.4	0.35	—	185,831
Strip Mall	0.80	0.40	7.25	6.09	0.04	0.55	—	0.55	0.55	—	0.55	—	8,649	8,649	0.77	0.02	—	8,673
General Office Building	0.89	0.44	8.09	6.79	0.05	0.61	—	0.61	0.61	—	0.61	—	9,647	9,647	0.85	0.02	—	9,674
Total	40.9	20.5	369	287	2.23	28.3	—	28.3	28.3	—	28.3	—	443,907	443,907	39.3	0.84	—	445,138
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	1.16	0.58	9.93	4.22	0.06	0.80	—	0.80	0.80	—	0.80	—	11,429	11,429	1.01	0.02	—	11,461
Single Family Housing	0.01	< 0.005	0.07	0.03	< 0.005	0.01	—	0.01	0.01	—	0.01	—	75.7	75.7	0.01	< 0.005	—	75.9
Industrial Park	2.87	1.44	26.1	21.9	0.16	1.99	—	1.99	1.99	—	1.99	—	28,279	28,279	2.50	0.05	—	28,357
Office Park	3.12	1.56	28.3	23.8	0.17	2.15	—	2.15	2.15	—	2.15	—	30,681	30,681	2.72	0.06	—	30,767
Strip Mall	0.15	0.07	1.32	1.11	0.01	0.10	—	0.10	0.10	—	0.10	—	1,432	1,432	0.13	< 0.005	—	1,436



General Office Building	0.16	0.08	1.48	1.24	0.01	0.11	—	0.11	0.11	—	0.11	—	1,597	1,597	0.14	< 0.005	—	1,602
Total	7.47	3.73	67.3	52.4	0.41	5.16	—	5.16	5.16	—	5.16	—	73,494	73,494	6.50	0.14	—	73,698

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	47,421	46,630	911	57,580	104	7,933	—	7,933	7,897	—	7,897	846,482	352,981	1,199,463	781	60.7	—	1,237,088
Consumer Products	—	1,523	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	103	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	483	450	31.3	3,559	0.18	4.01	—	4.01	3.03	—	3.03	—	12,113	12,113	0.51	0.10	—	12,156
Total	47,904	48,707	942	61,139	105	7,937	—	7,937	7,900	—	7,900	846,482	365,094	1,211,576	782	60.8	—	1,249,244
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	47,421	46,630	911	57,580	104	7,933	—	7,933	7,897	—	7,897	846,482	352,981	1,199,463	781	60.7	—	1,237,088

Consumer Products	—	1,523	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	103	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	47,421	48,257	911	57,580	104	7,933	—	7,933	7,897	—	7,897	846,482	352,981	1,199,463	781	60.7	—	1,237,088
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1,944	1,912	37.3	2,361	4.28	325	—	325	324	—	324	31,485	13,129	44,614	29.0	2.26	—	46,013
Consumer Products	—	278	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	18.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	43.5	40.5	2.82	320	0.02	0.36	—	0.36	0.27	—	0.27	—	989	989	0.04	0.01	—	993
Total	1,988	2,249	40.2	2,681	4.29	326	—	326	324	—	324	31,485	14,118	45,603	29.1	2.27	—	47,006

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	2,049	3,382	5,431	211	5.07	—	12,210

University CPU - Change from Existing Uses Custom Report, 4/25/2024

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	3.37	31.9	35.3	0.35	0.01	—	46.8
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	7,375	12,176	19,551	759	18.3	—	43,956
Office Park	—	—	—	—	—	—	—	—	—	—	—	6,150	10,154	16,303	633	15.2	—	36,654
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	885	1,461	2,347	91.0	2.19	—	5,276
General Office Building	—	—	—	—	—	—	—	—	—	—	—	320	529	849	32.9	0.79	—	1,908
Total	—	—	—	—	—	—	—	—	—	—	—	16,782	27,734	44,516	1,726	41.5	—	100,050
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	2,049	3,382	5,431	211	5.07	—	12,210
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	3.37	31.9	35.3	0.35	0.01	—	46.8
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	7,375	12,176	19,551	759	18.3	—	43,956
Office Park	—	—	—	—	—	—	—	—	—	—	—	6,150	10,154	16,303	633	15.2	—	36,654
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	885	1,461	2,347	91.0	2.19	—	5,276
General Office Building	—	—	—	—	—	—	—	—	—	—	—	320	529	849	32.9	0.79	—	1,908
Total	—	—	—	—	—	—	—	—	—	—	—	16,782	27,734	44,516	1,726	41.5	—	100,050
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	339	560	899	34.9	0.84	—	2,022

Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	0.56	5.29	5.85	0.06	< 0.005	—	7.74
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	1,221	2,016	3,237	126	3.02	—	7,277
Office Park	—	—	—	—	—	—	—	—	—	—	—	1,018	1,681	2,699	105	2.52	—	6,068
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	147	242	388	15.1	0.36	—	873
General Office Building	—	—	—	—	—	—	—	—	—	—	—	53.0	87.5	141	5.45	0.13	—	316
Total	—	—	—	—	—	—	—	—	—	—	—	2,778	4,592	7,370	286	6.88	—	16,564

#### 4.5. Waste Emissions by Land Use

##### 4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	12,127	0.00	12,127	1,212	0.00	—	42,429
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	17.8	0.00	17.8	1.78	0.00	—	62.1
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	11,122	0.00	11,122	1,112	0.00	—	38,913
Office Park	—	—	—	—	—	—	—	—	—	—	—	9,050	0.00	9,050	905	0.00	—	31,664
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	3,529	0.00	3,529	353	0.00	—	12,346

University CPU - Change from Existing Uses Custom Report, 4/25/2024

General Office Building	—	—	—	—	—	—	—	—	—	—	—	471	0.00	471	47.1	0.00	—	1,648
Total	—	—	—	—	—	—	—	—	—	—	—	36,318	0.00	36,318	3,630	0.00	—	127,063
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	12,127	0.00	12,127	1,212	0.00	—	42,429
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	17.8	0.00	17.8	1.78	0.00	—	62.1
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	11,122	0.00	11,122	1,112	0.00	—	38,913
Office Park	—	—	—	—	—	—	—	—	—	—	—	9,050	0.00	9,050	905	0.00	—	31,664
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	3,529	0.00	3,529	353	0.00	—	12,346
General Office Building	—	—	—	—	—	—	—	—	—	—	—	471	0.00	471	47.1	0.00	—	1,648
Total	—	—	—	—	—	—	—	—	—	—	—	36,318	0.00	36,318	3,630	0.00	—	127,063
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	2,008	0.00	2,008	201	0.00	—	7,025
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	2.94	0.00	2.94	0.29	0.00	—	10.3
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	1,841	0.00	1,841	184	0.00	—	6,442
Office Park	—	—	—	—	—	—	—	—	—	—	—	1,498	0.00	1,498	150	0.00	—	5,242
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	584	0.00	584	58.4	0.00	—	2,044

General Office Building	—	—	—	—	—	—	—	—	—	—	—	78.0	0.00	78.0	7.80	0.00	—	273
Total	—	—	—	—	—	—	—	—	—	—	—	6,013	0.00	6,013	601	0.00	—	21,037

## 4.6. Refrigerant Emissions by Land Use

### 4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	209	209
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.70	0.70
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,332	4,332
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	43.9	43.9
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	38.8	38.8
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.29	2.29
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,627	4,627
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartments	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	209	209
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.70	0.70
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,332	4,332
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	43.9	43.9
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	38.8	38.8
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.29	2.29
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	4,627	4,627
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	34.6	34.6
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.12	0.12
Industrial Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	717	717
Office Park	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	7.27	7.27
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	6.43	6.43
General Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.38	0.38
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	766	766

#### 4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—



Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.9. User Defined Emissions By Equipment Type

##### 4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Sequest	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments High Rise	135,413	137,848	109,244	48,188,295	625,227	636,468	504,397	222,493,661
Single Family Housing	472	477	428	170,220	2,179	2,202	1,974	785,937
Industrial Park	56,087	42,273	20,637	17,902,993	472,438	356,081	173,835	150,802,755
Office Park	199,891	29,613	13,723	54,374,140	1,683,747	249,444	115,596	458,011,121
Strip Mall	276,380	262,161	127,401	92,369,013	2,328,035	2,208,271	1,073,144	778,054,333
General Office Building	9,156	2,077	658	2,529,627	77,121	17,499	5,543	21,307,876

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments High Rise	—
Wood Fireplaces	10651
Gas Fireplaces	16737
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	3043

Conventional Wood Stoves	0
Catalytic Wood Stoves	1522
Non-Catalytic Wood Stoves	1522
Pellet Wood Stoves	0
Single Family Housing	—
Wood Fireplaces	18
Gas Fireplaces	28
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	5
Conventional Wood Stoves	0
Catalytic Wood Stoves	3
Non-Catalytic Wood Stoves	3
Pellet Wood Stoves	0

### 5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
59353357.5	19,784,453	62,814,000	20,938,000	—

### 5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

### 5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments High Rise	103,184,172	170	0.0330	0.0040	215,396,817
Single Family Housing	307,064	170	0.0330	0.0040	1,425,847
Industrial Park	276,183,374	170	0.0330	0.0040	532,959,223
Office Park	299,648,091	170	0.0330	0.0040	578,239,781
Strip Mall	54,967,587	170	0.0330	0.0040	26,985,769
General Office Building	15,598,893	170	0.0330	0.0040	30,101,644

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments High Rise	1,069,099,472	0.00
Single Family Housing	1,756,654	10,696,821
Industrial Park	3,848,693,750	0.00
Office Park	3,209,338,288	0.00
Strip Mall	461,916,244	0.00
General Office Building	167,069,723	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments High Rise	22,502	—
Single Family Housing	33.0	—

Industrial Park	20,637	—
Office Park	16,793	—
Strip Mall	6,548	—
General Office Building	874	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Industrial Park	Other commercial A/C and heat pumps	R-410A	2,088	0.30	4.00	4.00	18.0
Office Park	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
Office Park	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

General Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.02	0.60	0.00	1.00
General Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0

## 5.15. Operational Off-Road Equipment

### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------

## 5.16. Stationary Sources

### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
----------------	-----------	----------------	---------------	----------------	------------	-------------

### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
----------------	-----------	--------	--------------------------	------------------------------	------------------------------

## 5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

## 5.18. Vegetation

### 5.18.1. Land Use Change

#### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------



### 5.18.1. Biomass Cover Type

#### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

### 5.18.2. Sequestration

#### 5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
-----------	--------	------------------------------	------------------------------

## 8. User Changes to Default Data

# Hillcrest FPA - Change From Existing Uses Custom Report

## Table of Contents

### 1. Basic Project Information

#### 1.1. Basic Project Information

#### 1.2. Land Use Types

#### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

### 2. Emissions Summary

#### 2.4. Operations Emissions Compared Against Thresholds

#### 2.5. Operations Emissions by Sector, Unmitigated

### 4. Operations Emissions Details

#### 4.1. Mobile Emissions by Land Use

##### 4.1.1. Unmitigated

#### 4.2. Energy

##### 4.2.1. Electricity Emissions By Land Use - Unmitigated

##### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

#### 4.3. Area Emissions by Source

4.3.1. Unmitigated

4.4. Water Emissions by Land Use

4.4.1. Unmitigated

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

4.10. Soil Carbon Accumulation By Vegetation Type

4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

##### 5.10.1.1. Unmitigated

#### 5.10.2. Architectural Coatings

#### 5.10.3. Landscape Equipment

### 5.11. Operational Energy Consumption

#### 5.11.1. Unmitigated

### 5.12. Operational Water and Wastewater Consumption

#### 5.12.1. Unmitigated

### 5.13. Operational Waste Generation

#### 5.13.1. Unmitigated

### 5.14. Operational Refrigeration and Air Conditioning Equipment

#### 5.14.1. Unmitigated

### 5.15. Operational Off-Road Equipment

5.15.1. Unmitigated

5.16. Stationary Sources

5.16.1. Emergency Generators and Fire Pumps

5.16.2. Process Boilers

5.17. User Defined

5.18. Vegetation

5.18.1. Land Use Change

5.18.1.1. Unmitigated

5.18.1. Biomass Cover Type

5.18.1.1. Unmitigated

5.18.2. Sequestration

5.18.2.1. Unmitigated

8. User Changes to Default Data

# 1. Basic Project Information

## 1.1. Basic Project Information

Data Field	Value
Project Name	Hillcrest FPA - Change From Existing Uses
Operational Year	2050
Lead Agency	—
Land Use Scale	Plan/community
Analysis Level for Defaults	County
Windspeed (m/s)	2.70
Precipitation (days)	12.6
Location	San Diego, CA, USA
County	San Diego
City	San Diego
Air District	San Diego County APCD
Air Basin	San Diego
TAZ	6400
EDFZ	12
Electric Utility	San Diego Gas & Electric
Gas Utility	San Diego Gas & Electric
App Version	2022.1.1.22

## 1.2. Land Use Types

Land Use Subtype	Size	Unit	Lot Acreage	Building Area (sq ft)	Landscape Area (sq ft)	Special Landscape Area (sq ft)	Population	Description
Apartments High Rise	29,422	Dwelling Unit	475	28,245,120	0.00	—	82,087	—

Single Family Housing	213	Dwelling Unit	69.2	415,350	2,494,839	—	594	—
Medical Office Building	774	1000sqft	17.8	773,500	0.00	—	—	—
Strip Mall	1,373	1000sqft	31.5	1,372,500	0.00	—	—	—

### 1.3. User-Selected Emission Reduction Measures by Emissions Sector

No measures selected

## 2. Emissions Summary

### 2.4. Operations Emissions Compared Against Thresholds

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Un/Mit.	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	46,746	46,645	1,201	60,874	111	7,723	962	8,684	7,687	244	7,930	842,471	1,383,195	2,225,667	2,761	99.9	333	2,324,785
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	46,575	46,483	1,210	58,919	110	7,722	962	8,683	7,686	244	7,930	842,471	1,337,665	2,180,136	2,762	102	236	2,279,790
Average Daily (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	10,868	11,370	504	16,137	30.9	1,741	867	2,608	1,733	220	1,953	204,353	1,001,809	1,206,161	2,170	52.7	273	1,276,383
Annual (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Unmit.	1,983	2,075	91.9	2,945	5.64	318	158	476	316	40.1	356	33,833	165,861	199,694	359	8.72	45.1	211,320

## 2.5. Operations Emissions by Sector, Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Sector	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	462	431	237	3,077	8.79	3.56	962	965	3.33	244	247	—	893,990	893,990	31.1	33.4	99.6	904,820
Area	46,277	46,210	902	57,767	102	7,714	—	7,714	7,678	—	7,678	823,015	348,074	1,171,089	760	59.1	—	1,207,689
Energy	7.24	3.62	62.4	30.0	0.39	5.00	—	5.00	5.00	—	5.00	—	137,096	137,096	18.3	1.53	—	138,010
Water	—	—	—	—	—	—	—	—	—	—	—	2,376	4,035	6,411	244	5.88	—	14,275
Waste	—	—	—	—	—	—	—	—	—	—	—	17,080	0.00	17,080	1,707	0.00	—	59,758
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234
Total	46,746	46,645	1,201	60,874	111	7,723	962	8,684	7,687	244	7,930	842,471	1,383,195	2,225,667	2,761	99.9	333	2,324,785
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	462	431	262	2,905	8.39	3.56	962	965	3.33	244	247	—	853,338	853,338	33.0	35.4	2.58	864,721
Area	46,106	46,049	886	55,984	101	7,713	—	7,713	7,678	—	7,678	823,015	343,195	1,166,210	759	59.1	—	1,202,792
Energy	7.24	3.62	62.4	30.0	0.39	5.00	—	5.00	5.00	—	5.00	—	137,096	137,096	18.3	1.53	—	138,010
Water	—	—	—	—	—	—	—	—	—	—	—	2,376	4,035	6,411	244	5.88	—	14,275
Waste	—	—	—	—	—	—	—	—	—	—	—	17,080	0.00	17,080	1,707	0.00	—	59,758
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234
Total	46,575	46,483	1,210	58,919	110	7,722	962	8,683	7,686	244	7,930	842,471	1,337,665	2,180,136	2,762	102	236	2,279,790
Average Daily	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	418	390	234	2,651	7.68	3.24	867	870	3.03	220	223	—	781,170	781,170	29.7	32.0	39.1	791,476



Area	10,442	10,976	207	13,456	22.8	1,733	—	1,733	1,725	—	1,725	184,897	79,507	264,404	171	13.3	—	272,631
Energy	7.24	3.62	62.4	30.0	0.39	5.00	—	5.00	5.00	—	5.00	—	137,096	137,096	18.3	1.53	—	138,010
Water	—	—	—	—	—	—	—	—	—	—	—	2,376	4,035	6,411	244	5.88	—	14,275
Waste	—	—	—	—	—	—	—	—	—	—	—	17,080	0.00	17,080	1,707	0.00	—	59,758
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234
Total	10,868	11,370	504	16,137	30.9	1,741	867	2,608	1,733	220	1,953	204,353	1,001,809	1,206,161	2,170	52.7	273	1,276,383
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Mobile	76.3	71.2	42.8	484	1.40	0.59	158	159	0.55	40.1	40.6	—	129,332	129,332	4.92	5.29	6.47	131,038
Area	1,906	2,003	37.8	2,456	4.17	316	—	316	315	—	315	30,612	13,163	43,775	28.3	2.20	—	45,137
Energy	1.32	0.66	11.4	5.47	0.07	0.91	—	0.91	0.91	—	0.91	—	22,698	22,698	3.04	0.25	—	22,849
Water	—	—	—	—	—	—	—	—	—	—	—	393	668	1,061	40.5	0.97	—	2,363
Waste	—	—	—	—	—	—	—	—	—	—	—	2,828	0.00	2,828	283	0.00	—	9,894
Refrig.	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	38.7	38.7
Total	1,983	2,075	91.9	2,945	5.64	318	158	476	316	40.1	356	33,833	165,861	199,694	359	8.72	45.1	211,320

## 4. Operations Emissions Details

### 4.1. Mobile Emissions by Land Use

#### 4.1.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	260	245	123	1,493	4.01	1.66	434	436	1.55	110	112	—	407,993	407,993	16.2	16.7	44.9	413,432

Hillcrest FPA - Change From Existing Uses Custom Report, 4/25/2024

Single Family Housing	3.96	3.74	1.87	22.8	0.06	0.03	6.62	6.64	0.02	1.68	1.70	—	6,220	6,220	0.25	0.26	0.68	6,303
Medical Office Building	60.9	56.0	34.5	479	1.45	0.57	160	160	0.54	40.5	41.1	—	147,179	147,179	4.51	5.03	16.6	148,808
Strip Mall	138	127	77.9	1,082	3.27	1.30	361	363	1.21	91.6	92.8	—	332,597	332,597	10.2	11.4	37.4	336,277
Total	462	431	237	3,077	8.79	3.56	962	965	3.33	244	247	—	893,990	893,990	31.1	33.4	99.6	904,820
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	260	245	136	1,444	3.83	1.66	434	436	1.56	110	112	—	389,720	389,720	17.4	17.8	1.16	395,460
Single Family Housing	3.97	3.74	2.07	22.0	0.06	0.03	6.62	6.64	0.02	1.68	1.70	—	5,942	5,942	0.26	0.27	0.02	6,029
Medical Office Building	60.7	55.8	38.1	442	1.38	0.57	160	160	0.54	40.5	41.1	—	140,399	140,399	4.71	5.32	0.43	142,104
Strip Mall	137	126	86.0	998	3.12	1.30	361	363	1.21	91.6	92.8	—	317,276	317,276	10.6	12.0	0.97	321,128
Total	462	431	262	2,905	8.39	3.56	962	965	3.33	244	247	—	853,338	853,338	33.0	35.4	2.58	864,721
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	44.8	42.1	23.2	251	0.67	0.29	75.2	75.5	0.27	19.1	19.3	—	62,229	62,229	2.70	2.78	3.08	63,130
Single Family Housing	0.70	0.66	0.36	3.90	0.01	< 0.005	1.17	1.18	< 0.005	0.30	0.30	—	969	969	0.04	0.04	0.05	983
Medical Office Building	8.26	7.59	5.15	61.2	0.19	0.08	21.9	21.9	0.07	5.54	5.61	—	17,685	17,685	0.58	0.66	0.89	17,897
Strip Mall	22.6	20.8	14.1	168	0.53	0.22	59.9	60.1	0.20	15.2	15.4	—	48,449	48,449	1.59	1.80	2.45	49,029
Total	76.3	71.2	42.8	484	1.40	0.59	158	159	0.55	40.1	40.6	—	129,332	129,332	4.92	5.29	6.47	131,038

## 4.2. Energy

### 4.2.1. Electricity Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	46,367	46,367	9.02	1.09	—	46,918
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	608	608	0.12	0.01	—	615
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	5,966	5,966	1.16	0.14	—	6,036
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	5,623	5,623	1.09	0.13	—	5,689
Total	—	—	—	—	—	—	—	—	—	—	—	—	58,563	58,563	11.4	1.38	—	59,259
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	46,367	46,367	9.02	1.09	—	46,918
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	608	608	0.12	0.01	—	615
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	5,966	5,966	1.16	0.14	—	6,036
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	5,623	5,623	1.09	0.13	—	5,689
Total	—	—	—	—	—	—	—	—	—	—	—	—	58,563	58,563	11.4	1.38	—	59,259

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	7,677	7,677	1.49	0.18	—	7,768
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	101	101	0.02	< 0.005	—	102
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	988	988	0.19	0.02	—	999
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	931	931	0.18	0.02	—	942
Total	—	—	—	—	—	—	—	—	—	—	—	—	9,696	9,696	1.89	0.23	—	9,811

#### 4.2.3. Natural Gas Emissions By Land Use - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	6.15	3.08	52.6	22.4	0.34	4.25	—	4.25	4.25	—	4.25	—	66,745	66,745	5.91	0.13	—	66,930
Single Family Housing	0.18	0.09	1.53	0.65	0.01	0.12	—	0.12	0.12	—	0.12	—	1,947	1,947	0.17	< 0.005	—	1,952
Medical Office Building	0.73	0.37	6.65	5.59	0.04	0.51	—	0.51	0.51	—	0.51	—	7,938	7,938	0.70	0.01	—	7,960
Strip Mall	0.18	0.09	1.60	1.34	0.01	0.12	—	0.12	0.12	—	0.12	—	1,903	1,903	0.17	< 0.005	—	1,909
Total	7.24	3.62	62.4	30.0	0.39	5.00	—	5.00	5.00	—	5.00	—	78,533	78,533	6.95	0.15	—	78,751
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartme High Rise	6.15	3.08	52.6	22.4	0.34	4.25	—	4.25	4.25	—	4.25	—	66,745	66,745	5.91	0.13	—	66,930
Single Family Housing	0.18	0.09	1.53	0.65	0.01	0.12	—	0.12	0.12	—	0.12	—	1,947	1,947	0.17	< 0.005	—	1,952
Medical Office Building	0.73	0.37	6.65	5.59	0.04	0.51	—	0.51	0.51	—	0.51	—	7,938	7,938	0.70	0.01	—	7,960
Strip Mall	0.18	0.09	1.60	1.34	0.01	0.12	—	0.12	0.12	—	0.12	—	1,903	1,903	0.17	< 0.005	—	1,909
Total	7.24	3.62	62.4	30.0	0.39	5.00	—	5.00	5.00	—	5.00	—	78,533	78,533	6.95	0.15	—	78,751
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartme nts High Rise	1.12	0.56	9.60	4.08	0.06	0.78	—	0.78	0.78	—	0.78	—	11,050	11,050	0.98	0.02	—	11,081
Single Family Housing	0.03	0.02	0.28	0.12	< 0.005	0.02	—	0.02	0.02	—	0.02	—	322	322	0.03	< 0.005	—	323
Medical Office Building	0.13	0.07	1.21	1.02	0.01	0.09	—	0.09	0.09	—	0.09	—	1,314	1,314	0.12	< 0.005	—	1,318
Strip Mall	0.03	0.02	0.29	0.24	< 0.005	0.02	—	0.02	0.02	—	0.02	—	315	315	0.03	< 0.005	—	316
Total	1.32	0.66	11.4	5.47	0.07	0.91	—	0.91	0.91	—	0.91	—	13,002	13,002	1.15	0.02	—	13,038

### 4.3. Area Emissions by Source

#### 4.3.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Source	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Hillcrest FPA - Change From Existing Uses Custom Report, 4/25/2024

Hearths	46,106	45,337	886	55,984	101	7,713	—	7,713	7,678	—	7,678	823,015	343,195	1,166,210	759	59.1	—	1,202,792
Consumer Products	—	659	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	51.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Landscape Equipment	171	161	16.3	1,783	0.08	0.92	—	0.92	0.69	—	0.69	—	4,879	4,879	0.20	0.04	—	4,896
Total	46,277	46,210	902	57,767	102	7,714	—	7,714	7,678	—	7,678	823,015	348,074	1,171,089	760	59.1	—	1,207,689
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	46,106	45,337	886	55,984	101	7,713	—	7,713	7,678	—	7,678	823,015	343,195	1,166,210	759	59.1	—	1,202,792
Consumer Products	—	659	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	51.9	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	46,106	46,049	886	55,984	101	7,713	—	7,713	7,678	—	7,678	823,015	343,195	1,166,210	759	59.1	—	1,202,792
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Hearths	1,890	1,859	36.3	2,295	4.16	316	—	316	315	—	315	30,612	12,765	43,377	28.2	2.20	—	44,737
Consumer Products	—	120	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Architectural Coatings	—	9.47	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Landscape Equipment	15.4	14.5	1.47	160	0.01	0.08	—	0.08	0.06	—	0.06	—	398	398	0.02	< 0.005	—	400
Total	1,906	2,003	37.8	2,456	4.17	316	—	316	315	—	315	30,612	13,163	43,775	28.3	2.20	—	45,137

#### 4.4. Water Emissions by Land Use

##### 4.4.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	1,981	3,270	5,251	204	4.90	—	11,806
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	14.3	136	150	1.50	0.04	—	199
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	186	307	493	19.1	0.46	—	1,109
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	195	322	516	20.0	0.48	—	1,161
Total	—	—	—	—	—	—	—	—	—	—	—	2,376	4,035	6,411	244	5.88	—	14,275
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	1,981	3,270	5,251	204	4.90	—	11,806
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	14.3	136	150	1.50	0.04	—	199

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	186	307	493	19.1	0.46	—	1,109
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	195	322	516	20.0	0.48	—	1,161
Total	—	—	—	—	—	—	—	—	—	—	—	2,376	4,035	6,411	244	5.88	—	14,275
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	328	541	869	33.7	0.81	—	1,955
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	2.37	22.5	24.9	0.25	0.01	—	33.0
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	30.8	50.8	81.6	3.17	0.08	—	184
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	32.3	53.3	85.5	3.32	0.08	—	192
Total	—	—	—	—	—	—	—	—	—	—	—	393	668	1,061	40.5	0.97	—	2,363

4.5. Waste Emissions by Land Use

4.5.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	11,725	0.00	11,725	1,172	0.00	—	41,023
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	75.9	0.00	75.9	7.59	0.00	—	266



Hillcrest FPA - Change From Existing Uses Custom Report, 4/25/2024

Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	4,502	0.00	4,502	450	0.00	—	15,752
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	777	0.00	777	77.6	0.00	—	2,717
Total	—	—	—	—	—	—	—	—	—	—	—	17,080	0.00	17,080	1,707	0.00	—	59,758
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	11,725	0.00	11,725	1,172	0.00	—	41,023
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	75.9	0.00	75.9	7.59	0.00	—	266
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	4,502	0.00	4,502	450	0.00	—	15,752
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	777	0.00	777	77.6	0.00	—	2,717
Total	—	—	—	—	—	—	—	—	—	—	—	17,080	0.00	17,080	1,707	0.00	—	59,758
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	1,941	0.00	1,941	194	0.00	—	6,792
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	12.6	0.00	12.6	1.26	0.00	—	44.0
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	745	0.00	745	74.5	0.00	—	2,608
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	129	0.00	129	12.9	0.00	—	450
Total	—	—	—	—	—	—	—	—	—	—	—	2,828	0.00	2,828	283	0.00	—	9,894

4.6. Refrigerant Emissions by Land Use

4.6.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	202	202
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.97	2.97
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	19.8	19.8
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.55	8.55
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Apartments High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	202	202
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	2.97	2.97
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	19.8	19.8
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	8.55	8.55
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	234	234
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Apartme High Rise	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	33.5	33.5
Single Family Housing	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	0.49	0.49
Medical Office Building	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	3.27	3.27
Strip Mall	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	1.42	1.42
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	38.7	38.7

4.7. Offroad Emissions By Equipment Type

4.7.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipme nt Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e	
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.8. Stationary Emissions By Equipment Type

4.8.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.9. User Defined Emissions By Equipment Type

4.9.1. Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Equipment Type	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

#### 4.10. Soil Carbon Accumulation By Vegetation Type

##### 4.10.1. Soil Carbon Accumulation By Vegetation Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Vegetation	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

##### 4.10.2. Above and Belowground Carbon Accumulation by Land Use Type - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Land Use	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Total	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

4.10.3. Avoided and Sequestered Emissions by Species - Unmitigated

Criteria Pollutants (lb/day for daily, ton/yr for annual) and GHGs (lb/day for daily, MT/yr for annual)

Species	TOG	ROG	NOx	CO	SO2	PM10E	PM10D	PM10T	PM2.5E	PM2.5D	PM2.5T	BCO2	NBCO2	CO2T	CH4	N2O	R	CO2e
Daily, Summer (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Daily, Winter (Max)	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Annual	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Avoided	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Sequestered	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Removed	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
Subtotal	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—
—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—	—

## 5. Activity Data

### 5.9. Operational Mobile Sources

#### 5.9.1. Unmitigated

Land Use Type	Trips/Weekday	Trips/Saturday	Trips/Sunday	Trips/Year	VMT/Weekday	VMT/Saturday	VMT/Sunday	VMT/Year
Apartments High Rise	130,928	133,282	105,625	46,592,047	604,517	615,384	487,689	215,123,513
Single Family Housing	2,011	2,032	1,821	725,139	9,284	9,382	8,409	3,348,090
Medical Office Building	26,918	6,629	1,098	7,420,777	226,737	55,837	9,252	62,507,622
Strip Mall	60,829	57,700	28,040	20,329,774	512,384	486,025	236,192	171,244,319

### 5.10. Operational Area Sources

#### 5.10.1. Hearths

5.10.1.1. Unmitigated

Hearth Type	Unmitigated (number)
Apartments High Rise	—
Wood Fireplaces	10298
Gas Fireplaces	16182
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	2942
Conventional Wood Stoves	0
Catalytic Wood Stoves	1471
Non-Catalytic Wood Stoves	1471
Pellet Wood Stoves	0
Single Family Housing	—
Wood Fireplaces	75
Gas Fireplaces	117
Propane Fireplaces	0
Electric Fireplaces	0
No Fireplaces	21
Conventional Wood Stoves	0
Catalytic Wood Stoves	11
Non-Catalytic Wood Stoves	11
Pellet Wood Stoves	0

5.10.2. Architectural Coatings

Residential Interior Area Coated (sq ft)	Residential Exterior Area Coated (sq ft)	Non-Residential Interior Area Coated (sq ft)	Non-Residential Exterior Area Coated (sq ft)	Parking Area Coated (sq ft)
58037451.75	19,345,817	3,219,000	1,073,000	—



5.10.3. Landscape Equipment

Season	Unit	Value
Snow Days	day/yr	0.00
Summer Days	day/yr	180

5.11. Operational Energy Consumption

5.11.1. Unmitigated

Electricity (kWh/yr) and CO2 and CH4 and N2O and Natural Gas (kBTU/yr)

Land Use	Electricity (kWh/yr)	CO2	CH4	N2O	Natural Gas (kBTU/yr)
Apartments High Rise	99,766,175	170	0.0330	0.0040	208,261,753
Single Family Housing	1,308,092	170	0.0330	0.0040	6,074,107
Medical Office Building	12,835,897	170	0.0330	0.0040	24,769,811
Strip Mall	12,097,982	170	0.0330	0.0040	5,939,379

5.12. Operational Water and Wastewater Consumption

5.12.1. Unmitigated

Land Use	Indoor Water (gal/year)	Outdoor Water (gal/year)
Apartments High Rise	1,033,685,333	0.00
Single Family Housing	7,483,345	45,568,456
Medical Office Building	97,059,196	0.00
Strip Mall	101,664,536	0.00

5.13. Operational Waste Generation

5.13.1. Unmitigated

Land Use	Waste (ton/year)	Cogeneration (kWh/year)
Apartments High Rise	21,757	—
Single Family Housing	141	—
Medical Office Building	8,354	—
Strip Mall	1,441	—

## 5.14. Operational Refrigeration and Air Conditioning Equipment

### 5.14.1. Unmitigated

Land Use Type	Equipment Type	Refrigerant	GWP	Quantity (kg)	Operations Leak Rate	Service Leak Rate	Times Serviced
Apartments High Rise	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Apartments High Rise	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Single Family Housing	Average room A/C & Other residential A/C and heat pumps	R-410A	2,088	< 0.005	2.50	2.50	10.0
Single Family Housing	Household refrigerators and/or freezers	R-134a	1,430	0.12	0.60	0.00	1.00
Medical Office Building	Household refrigerators and/or freezers	R-134a	1,430	0.45	0.60	0.00	1.00
Medical Office Building	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Other commercial A/C and heat pumps	R-410A	2,088	< 0.005	4.00	4.00	18.0
Strip Mall	Stand-alone retail refrigerators and freezers	R-134a	1,430	0.04	1.00	0.00	1.00
Strip Mall	Walk-in refrigerators and freezers	R-404A	3,922	< 0.005	7.50	7.50	20.0

### 5.15. Operational Off-Road Equipment

#### 5.15.1. Unmitigated

Equipment Type	Fuel Type	Engine Tier	Number per Day	Hours Per Day	Horsepower	Load Factor
----------------	-----------	-------------	----------------	---------------	------------	-------------

### 5.16. Stationary Sources

#### 5.16.1. Emergency Generators and Fire Pumps

Equipment Type	Fuel Type	Number per Day	Hours per Day	Hours per Year	Horsepower	Load Factor
----------------	-----------	----------------	---------------	----------------	------------	-------------

#### 5.16.2. Process Boilers

Equipment Type	Fuel Type	Number	Boiler Rating (MMBtu/hr)	Daily Heat Input (MMBtu/day)	Annual Heat Input (MMBtu/yr)
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### 5.17. User Defined

Equipment Type	Fuel Type
----------------	-----------

### 5.18. Vegetation

#### 5.18.1. Land Use Change

##### 5.18.1.1. Unmitigated

Vegetation Land Use Type	Vegetation Soil Type	Initial Acres	Final Acres
--------------------------	----------------------	---------------	-------------

#### 5.18.1. Biomass Cover Type

##### 5.18.1.1. Unmitigated

Biomass Cover Type	Initial Acres	Final Acres
--------------------	---------------	-------------

5.18.2. Sequestration

5.18.2.1. Unmitigated

Tree Type	Number	Electricity Saved (kWh/year)	Natural Gas Saved (btu/year)
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### 8. User Changes to Default Data

Screen	Justification
Land Use	—



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**Professional Certifications:**

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California Certified Hydrogeologist  
Qualified SWPPP Developer and Practitioner

**Professional Experience:**

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989– 1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

**Senior Regulatory and Litigation Support Analyst:**

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 100 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

**Executive Director:**

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

**Hydrogeology:**

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nation-wide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

### **Policy:**

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, *Oxygenates in Water: Critical Information and Research Needs*.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific



- principles into the policy-making process.
- Established national protocol for the peer review of scientific documents.

### **Geology:**

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

### **Teaching:**

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

### **Invited Testimony, Reports, Papers and Presentations:**

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

**Hagemann, M.F.**, 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).

**Hagemann, M.F.**, 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

**Hagemann, M.F.**, 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

**Hagemann, M.F.**, 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

**Hagemann, M.F.**, 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

**Hagemann, M.F.**, 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

**Hagemann, M.F.**, 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

**Hagemann, M.F.**, 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

**Hagemann, M.F.**, and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

**Hagemann, M.F.**, 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

**Hagemann, M.F.**, 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

**Hagemann, M.F.**, and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

**Hagemann, M.F.**, Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

**Hagemann, M. F.**, Fukanaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

**Hagemann, M.F.**, 1994. Groundwater Characterization and Cleanup at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

**Hagemann, M.F.** and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

**Hagemann, M.F.**, 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

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**Hagemann, M.F.**, 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

**Other Experience:**

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.



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## ***Paul Rosenfeld, Ph.D.***

**Chemical Fate and Transport & Air Dispersion Modeling**

*Principal Environmental Chemist*

**Risk Assessment & Remediation Specialist**

### **Education**

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Focus on wastewater treatment.

### **Professional Experience**

Dr. Rosenfeld has over 25 years of experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, industrial, military and agricultural sources, unconventional oil drilling operations, and locomotive and construction engines. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities. Dr. Rosenfeld has also successfully modeled exposure to contaminants distributed by water systems and via vapor intrusion.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, creosote, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at sites and has testified as an expert witness on numerous cases involving exposure to soil, water and air contaminants from industrial, railroad, agricultural, and military sources.

## **Professional History:**

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner  
UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)  
UCLA School of Public Health; 2003 to 2006; Adjunct Professor  
UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator  
UCLA Institute of the Environment, 2001-2002; Research Associate  
Komex H<sub>2</sub>O Science, 2001 to 2003; Senior Remediation Scientist  
National Groundwater Association, 2002-2004; Lecturer  
San Diego State University, 1999-2001; Adjunct Professor  
Anteon Corp., San Diego, 2000-2001; Remediation Project Manager  
Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager  
Bechtel, San Diego, California, 1999 – 2000; Risk Assessor  
King County, Seattle, 1996 – 1999; Scientist  
James River Corp., Washington, 1995-96; Scientist  
Big Creek Lumber, Davenport, California, 1995; Scientist  
Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist  
Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

## **Publications:**

**Rosenfeld P. E.**, Spaeth K., Hallman R., Bressler R., Smith, G., (2022) Cancer Risk and Diesel Exhaust Exposure Among Railroad Workers. *Water Air Soil Pollution*. **233**, 171.

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

Simons, R.A., Seo, Y. **Rosenfeld, P.**, (2015) Modeling the Effect of Refinery Emission On Residential Property Value. *Journal of Real Estate Research*. 27(3):321-342

Chen, J. A, Zapata A. R., Sutherland A. J., Molmen, D.R., Chow, B. S., Wu, L. E., **Rosenfeld, P. E.**, Hesse, R. C., (2012) Sulfur Dioxide and Volatile Organic Compound Exposure To A Community In Texas City Texas Evaluated Using Aermoc and Empirical Data. *American Journal of Environmental Science*, 8(6), 622-632.

**Rosenfeld, P.E.** & Feng, L. (2011). *The Risks of Hazardous Waste*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2011). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Agrochemical Industry*, Amsterdam: Elsevier Publishing.

Gonzalez, J., Feng, L., Sutherland, A., Waller, C., Sok, H., Hesse, R., **Rosenfeld, P.** (2010). PCBs and Dioxins/Furans in Attic Dust Collected Near Former PCB Production and Secondary Copper Facilities in Sauget, IL. *Procedia Environmental Sciences*. 113–125.

Feng, L., Wu, C., Tam, L., Sutherland, A.J., Clark, J.J., **Rosenfeld, P.E.** (2010). Dioxin and Furan Blood Lipid and Attic Dust Concentrations in Populations Living Near Four Wood Treatment Facilities in the United States. *Journal of Environmental Health*. 73(6), 34-46.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2010). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Wood and Paper Industries*. Amsterdam: Elsevier Publishing.

Cheremisinoff, N.P., & **Rosenfeld, P.E.** (2009). *Handbook of Pollution Prevention and Cleaner Production: Best Practices in the Petroleum Industry*. Amsterdam: Elsevier Publishing.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. *WIT Transactions on Ecology and the Environment, Air Pollution*, 123 (17), 319-327.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). A Statistical Analysis Of Attic Dust And Blood Lipid Concentrations Of Tetrachloro-p-Dibenzodioxin (TCDD) Toxicity Equivalency Quotients (TEQ) In Two Populations Near Wood Treatment Facilities. *Organohalogen Compounds*, 70, 002252-002255.

Tam L. K., Wu C. D., Clark J. J. and **Rosenfeld, P.E.** (2008). Methods For Collect Samples For Assessing Dioxins And Other Environmental Contaminants In Attic Dust: A Review. *Organohalogen Compounds*, 70, 000527-000530.

Hensley, A.R. A. Scott, J. J. J. Clark, **Rosenfeld, P.E.** (2007). Attic Dust and Human Blood Samples Collected near a Former Wood Treatment Facility. *Environmental Research*. 105, 194-197.

**Rosenfeld, P.E.**, J. J. J. Clark, A. R. Hensley, M. Suffet. (2007). The Use of an Odor Wheel Classification for Evaluation of Human Health Risk Criteria for Compost Facilities. *Water Science & Technology* 55(5), 345-357.

**Rosenfeld, P. E.**, M. Suffet. (2007). The Anatomy Of Odour Wheels For Odours Of Drinking Water, Wastewater, Compost And The Urban Environment. *Water Science & Technology* 55(5), 335-344.

Sullivan, P. J. Clark, J.J.J., Agardy, F. J., **Rosenfeld, P.E.** (2007). *Toxic Legacy, Synthetic Toxins in the Food, Water, and Air in American Cities*. Boston Massachusetts: Elsevier Publishing

**Rosenfeld, P.E.**, and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash. *Water Science and Technology*. 49(9),171-178.

**Rosenfeld P. E.**, J.J. Clark, I.H. (Mel) Suffet (2004). The Value of An Odor-Quality-Wheel Classification Scheme For The Urban Environment. *Water Environment Federation's Technical Exhibition and Conference (WEFTEC) 2004*. New Orleans, October 2-6, 2004.

**Rosenfeld, P.E.**, and Suffet, I.H. (2004). Understanding Odorants Associated With Compost, Biomass Facilities, and the Land Application of Biosolids. *Water Science and Technology*. 49(9), 193-199.

**Rosenfeld, P.E.**, and Suffet I.H. (2004). Control of Compost Odor Using High Carbon Wood Ash, *Water Science and Technology*, 49( 9), 171-178.

**Rosenfeld, P. E.**, Grey, M. A., Sellew, P. (2004). Measurement of Biosolids Odor and Odorant Emissions from Windrows, Static Pile and Biofilter. *Water Environment Research*. 76(4), 310-315.

**Rosenfeld, P.E.**, Grey, M and Suffet, M. (2002). Compost Demonstration Project, Sacramento California Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Integrated Waste Management Board Public Affairs Office, Publications Clearinghouse (MS-6)*, Sacramento, CA Publication #442-02-008.

**Rosenfeld, P.E.**, and C.L. Henry. (2001). Characterization of odor emissions from three different biosolids. *Water Soil and Air Pollution*. 127(1-4), 173-191.

**Rosenfeld, P.E.**, and Henry C. L., (2000). Wood ash control of odor emissions from biosolids application. *Journal of Environmental Quality*. 29, 1662-1668.

**Rosenfeld, P.E.**, C.L. Henry and D. Bennett. (2001). Wastewater dewatering polymer affect on biosolids odor emissions and microbial activity. *Water Environment Research*. 73(4), 363-367.

**Rosenfeld, P.E.**, and C.L. Henry. (2001). Activated Carbon and Wood Ash Sorption of Wastewater, Compost, and Biosolids Odorants. *Water Environment Research*, 73, 388-393.

**Rosenfeld, P.E.**, and Henry C. L., (2001). High carbon wood ash effect on biosolids microbial activity and odor. *Water Environment Research*. 131(1-4), 247-262.

Chollack, T. and **P. Rosenfeld**. (1998). Compost Amendment Handbook For Landscaping. Prepared for and distributed by the City of Redmond, Washington State.

**Rosenfeld, P. E.** (1992). The Mount Liamuiga Crater Trail. *Heritage Magazine of St. Kitts*, 3(2).

**Rosenfeld, P. E.** (1993). High School Biogas Project to Prevent Deforestation On St. Kitts. *Biomass Users Network*, 7(1).

**Rosenfeld, P. E.** (1998). Characterization, Quantification, and Control of Odor Emissions From Biosolids Application To Forest Soil. Doctoral Thesis. University of Washington College of Forest Resources.

**Rosenfeld, P. E.** (1994). Potential Utilization of Small Diameter Trees on Sierra County Public Land. Masters thesis reprinted by the Sierra County Economic Council. Sierra County, California.

**Rosenfeld, P. E.** (1991). How to Build a Small Rural Anaerobic Digester & Uses Of Biogas In The First And Third World. Bachelors Thesis. University of California.

## **Presentations:**

**Rosenfeld, P.E.**, "The science for Perfluorinated Chemicals (PFAS): What makes remediation so hard?" Law Seminars International, (May 9-10, 2018) 800 Fifth Avenue, Suite 101 Seattle, WA.

**Rosenfeld, P.E.**, Sutherland, A; Hesse, R.; Zapata, A. (October 3-6, 2013). Air dispersion modeling of volatile organic emissions from multiple natural gas wells in Decatur, TX. *44th Western Regional Meeting, American Chemical Society*. Lecture conducted from Santa Clara, CA.

Sok, H.L.; Waller, C.C.; Feng, L.; Gonzalez, J.; Sutherland, A.J.; Wisdom-Stack, T.; Sahai, R.K.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Atrazine: A Persistent Pesticide in Urban Drinking Water. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

Feng, L.; Gonzalez, J.; Sok, H.L.; Sutherland, A.J.; Waller, C.C.; Wisdom-Stack, T.; Sahai, R.K.; La, M.; Hesse, R.C.; **Rosenfeld, P.E.** (June 20-23, 2010). Bringing Environmental Justice to East St. Louis, Illinois. *Urban Environmental Pollution*. Lecture conducted from Boston, MA.

**Rosenfeld, P.E.** (April 19-23, 2009). Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*, Lecture conducted from Tuscon, AZ.

**Rosenfeld, P.E.** (April 19-23, 2009). Cost to Filter Atrazine Contamination from Drinking Water in the United States" Contamination in Drinking Water From the Use of Aqueous Film Forming Foams (AFFF) at Airports in the United States. *2009 Ground Water Summit and 2009 Ground Water Protection Council Spring Meeting*. Lecture conducted from Tuscon, AZ.

Wu, C., Tam, L., Clark, J., **Rosenfeld, P.** (20-22 July, 2009). Dioxin and furan blood lipid concentrations in populations living near four wood treatment facilities in the United States. Brebbia, C.A. and Popov, V., eds., *Air Pollution XVII: Proceedings of the Seventeenth International Conference on Modeling, Monitoring and Management of Air Pollution*. Lecture conducted from Tallinn, Estonia.

**Rosenfeld, P. E.** (October 15-18, 2007). Moss Point Community Exposure To Contaminants From A Releasing Facility. *The 23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.



**Rosenfeld, P. E.** (October 15-18, 2007). The Repeated Trespass of Tritium-Contaminated Water Into A Surrounding Community Form Repeated Waste Spills From A Nuclear Power Plant. *The 23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water*. Platform lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld, P. E.** (October 15-18, 2007). Somerville Community Exposure To Contaminants From Wood Treatment Facility Emissions. *The 23<sup>rd</sup> Annual International Conferences on Soils Sediment and Water*. Lecture conducted from University of Massachusetts, Amherst MA.

**Rosenfeld P. E.** (March 2007). Production, Chemical Properties, Toxicology, & Treatment Case Studies of 1,2,3-Trichloropropane (TCP). *The Association for Environmental Health and Sciences (AEHS) Annual Meeting*. Lecture conducted from San Diego, CA.

**Rosenfeld P. E.** (March 2007). Blood and Attic Sampling for Dioxin/Furan, PAH, and Metal Exposure in Florala, Alabama. *The AEHS Annual Meeting*. Lecture conducted from San Diego, CA.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

**Paul Rosenfeld Ph.D.** (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

**Paul Rosenfeld Ph.D.** (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

**Paul Rosenfeld Ph.D.** (September 19, 2005). Fate, Transport, Toxicity, And Persistence of 1,2,3-TCP. *PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel in Irvine, California.

**Paul Rosenfeld Ph.D.** (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

**Paul Rosenfeld Ph.D.** (June 7-8, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. *International Society of Environmental Forensics: Focus On Emerging Contaminants*. Lecture conducted from Sheraton Oceanfront Hotel, Virginia Beach, Virginia.

**Paul Rosenfeld Ph.D.** (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld Ph.D.** (July 21-22, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, Toxicology and Remediation. *2005 National Groundwater Association Ground Water and Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. and Rob Hesse R.G. (May 5-6, 2004). Tert-butyl Alcohol Liability and Toxicology, A National Problem and Unquantified Liability. *National Groundwater Association. Environmental Law Conference*. Lecture conducted from Congress Plaza Hotel, Chicago Illinois.

**Paul Rosenfeld, Ph.D.** (March 2004). Perchlorate Toxicology. *Meeting of the American Groundwater Trust*. Lecture conducted from Phoenix Arizona.

Hagemann, M.F., **Paul Rosenfeld, Ph.D.** and Rob Hesse (2004). Perchlorate Contamination of the Colorado River. *Meeting of tribal representatives*. Lecture conducted from Parker, AZ.

**Paul Rosenfeld, Ph.D.** (April 7, 2004). A National Damage Assessment Model For PCE and Dry Cleaners. *Drycleaner Symposium. California Ground Water Association*. Lecture conducted from Radison Hotel, Sacramento, California.

**Rosenfeld, P. E.**, Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference Orlando, FL*.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

**Paul Rosenfeld, Ph.D.** (February 6-7, 2003). Underground Storage Tank Litigation and Remediation. *California CUPA Forum*. Lecture conducted from Marriott Hotel, Anaheim California.

**Paul Rosenfeld, Ph.D.** (October 23, 2002) Underground Storage Tank Litigation and Remediation. *EPA Underground Storage Tank Roundtable*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E.** and Suffet, M. (October 7- 10, 2002). Understanding Odor from Compost, *Wastewater and Industrial Processes. Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

**Rosenfeld, P.E.** and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

**Rosenfeld, P.E.** (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

**Rosenfeld, P.E.** (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

**Rosenfeld, P.E.** (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E.**, C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.**, and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

**Rosenfeld, P.E.,** C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

**Rosenfeld, P.E.,** C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.

**Rosenfeld, P.E,** C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.,** C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

## **Teaching Experience:**

UCLA Department of Environmental Health (Summer 2003 through 2010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

## **Academic Grants Awarded:**

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

## **Deposition and/or Trial Testimony:**

In the Superior Court of the State of California, County of San Bernardino  
Billy Wildrick, Plaintiff vs. BNSF Railway Company  
Case No. CIVDS1711810  
Rosenfeld Deposition 10-17-2022

In the State Court of Bibb County, State of Georgia  
Richard Hutcherson, Plaintiff vs Norfolk Southern Railway Company  
Case No. 10-SCCV-092007  
Rosenfeld Deposition 10-6-2022

In the Civil District Court of the Parish of Orleans, State of Louisiana  
Millard Clark, Plaintiff vs. Dixie Carriers, Inc. et al.  
Case No. 2020-03891  
Rosenfeld Deposition 9-15-2022

In The Circuit Court of Livingston County, State of Missouri, Circuit Civil Division  
Shirley Ralls, Plaintiff vs. Canadian Pacific Railway and Soo Line Railroad  
Case No. 18-LV-CC0020  
Rosenfeld Deposition 9-7-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division  
Jonny C. Daniels, Plaintiff vs. CSX Transportation Inc.  
Case No. 20-CA-5502  
Rosenfeld Deposition 9-1-2022

In The Circuit Court of St. Louis County, State of Missouri  
Kieth Luke et. al. Plaintiff vs. Monsanto Company et. al.  
Case No. 19SL-CC03191  
Rosenfeld Deposition 8-25-2022

In The Circuit Court of the 13th Judicial Circuit Court, Hillsborough County, Florida Civil Division  
Jeffery S. Lamotte, Plaintiff vs. CSX Transportation Inc.  
Case No. NO. 20-CA-0049  
Rosenfeld Deposition 8-22-2022

In State of Minnesota District Court, County of St. Louis Sixth Judicial District  
Greg Bean, Plaintiff vs. Soo Line Railroad Company  
Case No. 69-DU-CV-21-760  
Rosenfeld Deposition 8-17-2022

In United States District Court Western District of Washington at Tacoma, Washington  
John D. Fitzgerald Plaintiff vs. BNSF  
Case No. 3:21-cv-05288-RJB  
Rosenfeld Deposition 8-11-2022

In Circuit Court of the Sixth Judicial Circuit, Macon Illinois  
Rocky Bennyhoff Plaintiff vs. Norfolk Southern  
Case No. 20-L-56  
Rosenfeld Deposition 8-3-2022

In Court of Common Pleas, Hamilton County Ohio  
Joe Briggins Plaintiff vs. CSX  
Case No. A2004464  
Rosenfeld Deposition 6-17-2022

In the Superior Court of the State of California, County of Kern  
George LaFazia vs. BNSF Railway Company.  
Case No. BCV-19-103087  
Rosenfeld Deposition 5-17-2022

In the Circuit Court of Cook County Illinois  
Bobby Earles vs. Penn Central et. al.  
Case No. 2020-L-000550  
Rosenfeld Deposition 4-16-2022

In United States District Court Easter District of Florida  
Albert Hartman Plaintiff vs. Illinois Central  
Case No. 2:20-cv-1633  
Rosenfeld Deposition 4-4-2022

In the Circuit Court of the 4<sup>th</sup> Judicial Circuit, in and For Duval County, Florida  
Barbara Steele vs. CSX Transportation  
Case No.16-219-Ca-008796  
Rosenfeld Deposition 3-15-2022

In United States District Court Easter District of New York  
Romano et al. vs. Northrup Grumman Corporation  
Case No. 16-cv-5760  
Rosenfeld Deposition 3-10-2022

In the Circuit Court of Cook County Illinois  
Linda Benjamin vs. Illinois Central  
Case No. No. 2019 L 007599  
Rosenfeld Deposition 1-26-2022

In the Circuit Court of Cook County Illinois  
Donald Smith vs. Illinois Central  
Case No. No. 2019 L 003426  
Rosenfeld Deposition 1-24-2022

In the Circuit Court of Cook County Illinois  
Jan Holeman vs. BNSF  
Case No. 2019 L 000675  
Rosenfeld Deposition 1-18-2022

In the State Court of Bibb County State of Georgia  
Dwayne B. Garrett vs. Norfolk Southern  
Case No. 20-SCCV-091232  
Rosenfeld Deposition 11-10-2021

In the Circuit Court of Cook County Illinois  
Joseph Ruepke vs. BNSF  
Case No. 2019 L 007730  
Rosenfeld Deposition 11-5-2021

In the United States District Court For the District of Nebraska  
Steven Gillett vs. BNSF  
Case No. 4:20-cv-03120  
Rosenfeld Deposition 10-28-2021

In the Montana Thirteenth District Court of Yellowstone County  
James Eadus vs. Soo Line Railroad and BNSF  
Case No. DV 19-1056  
Rosenfeld Deposition 10-21-2021

In the Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois  
Martha Custer et al.cvs. Cerro Flow Products, Inc.  
Case No. 0i9-L-2295  
Rosenfeld Deposition 5-14-2021  
Trial October 8-4-2021

In the Circuit Court of Cook County Illinois  
Joseph Rafferty vs. Consolidated Rail Corporation and National Railroad Passenger Corporation d/b/a  
AMTRAK,  
Case No. 18-L-6845  
Rosenfeld Deposition 6-28-2021

In the United States District Court For the Northern District of Illinois  
Theresa Romcoe vs. Northeast Illinois Regional Commuter Railroad Corporation d/b/a METRA Rail  
Case No. 17-cv-8517  
Rosenfeld Deposition 5-25-2021

In the Superior Court of the State of Arizona In and For the Cunty of Maricopa  
Mary Tryon et al. vs. The City of Pheonix v. Cox Cactus Farm, L.L.C., Utah Shelter Systems, Inc.  
Case No. CV20127-094749  
Rosenfeld Deposition 5-7-2021

In the United States District Court for the Eastern District of Texas Beaumont Division  
Robinson, Jeremy et al vs. CNA Insurance Company et al.  
Case No. 1:17-cv-000508  
Rosenfeld Deposition 3-25-2021

In the Superior Court of the State of California, County of San Bernardino  
Gary Garner, Personal Representative for the Estate of Melvin Garner vs. BNSF Railway Company.  
Case No. 1720288  
Rosenfeld Deposition 2-23-2021

In the Superior Court of the State of California, County of Los Angeles, Spring Street Courthouse  
Benny M Rodriguez vs. Union Pacific Railroad, A Corporation, et al.  
Case No. 18STCV01162  
Rosenfeld Deposition 12-23-2020

In the Circuit Court of Jackson County, Missouri  
Karen Cornwell, Plaintiff, vs. Marathon Petroleum, LP, Defendant.  
Case No. 1716-CV10006  
Rosenfeld Deposition 8-30-2019

In the United States District Court For The District of New Jersey  
Duarte et al, Plaintiffs, vs. United States Metals Refining Company et. al. Defendant.  
Case No. 2:17-cv-01624-ES-SCM  
Rosenfeld Deposition 6-7-2019

In the United States District Court of Southern District of Texas Galveston Division  
M/T Carla Maersk vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido” Defendant.  
Case No. 3:15-CV-00106 consolidated with 3:15-CV-00237  
Rosenfeld Deposition 5-9-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica  
Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants  
Case No. BC615636  
Rosenfeld Deposition 1-26-2019

In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica  
The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants  
Case No. BC646857  
Rosenfeld Deposition 10-6-2018; Trial 3-7-19

In United States District Court For The District of Colorado  
Bells et al. Plaintiffs vs. The 3M Company et al., Defendants  
Case No. 1:16-cv-02531-RBJ  
Rosenfeld Deposition 3-15-2018 and 4-3-2018

In The District Court Of Regan County, Texas, 112<sup>th</sup> Judicial District  
Phillip Bales et al., Plaintiff vs. Dow Agrosiences, LLC, et al., Defendants  
Cause No. 1923  
Rosenfeld Deposition 11-17-2017

In The Superior Court of the State of California In And For The County Of Contra Costa  
Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants  
Cause No. C12-01481  
Rosenfeld Deposition 11-20-2017

In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois  
Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants  
Case No.: No. 0i9-L-2295  
Rosenfeld Deposition 8-23-2017

In United States District Court For The Southern District of Mississippi  
Guy Manuel vs. The BP Exploration et al., Defendants  
Case No. 1:19-cv-00315-RHW  
Rosenfeld Deposition 4-22-2020

In The Superior Court of the State of California, For The County of Los Angeles  
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC  
Case No. LC102019 (c/w BC582154)  
Rosenfeld Deposition 8-16-2017, Trail 8-28-2018

In the Northern District Court of Mississippi, Greenville Division  
Brenda J. Cooper, et al., Plaintiffs, vs. Meritor Inc., et al., Defendants  
Case No. 4:16-cv-52-DMB-JVM  
Rosenfeld Deposition July 2017

In The Superior Court of the State of Washington, County of Snohomish  
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants  
Case No. 13-2-03987-5  
Rosenfeld Deposition, February 2017  
Trial March 2017

In The Superior Court of the State of California, County of Alameda  
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants  
Case No. RG14711115  
Rosenfeld Deposition September 2015

In The Iowa District Court In And For Poweshiek County  
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants  
Case No. LALA002187  
Rosenfeld Deposition August 2015

In The Circuit Court of Ohio County, West Virginia  
Robert Andrews, et al. v. Antero, et al.  
Civil Action No. 14-C-30000  
Rosenfeld Deposition June 2015

In The Iowa District Court for Muscatine County  
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant  
Case No. 4980  
Rosenfeld Deposition May 2015

In the Circuit Court of the 17<sup>th</sup> Judicial Circuit, in and For Broward County, Florida  
Walter Hinton, et. al. Plaintiff, vs. City of Fort Lauderdale, Florida, a Municipality, Defendant.  
Case No. CACE07030358 (26)  
Rosenfeld Deposition December 2014

In the County Court of Dallas County Texas  
Lisa Parr et al, Plaintiff, vs. Aruba et al, Defendant.  
Case No. cc-11-01650-E  
Rosenfeld Deposition: March and September 2013  
Rosenfeld Trial April 2014

In the Court of Common Pleas of Tuscarawas County Ohio  
John Michael Abicht, et al., Plaintiffs, vs. Republic Services, Inc., et al., Defendants  
Case No. 2008 CT 10 0741 (Cons. w/ 2009 CV 10 0987)  
Rosenfeld Deposition October 2012

In the United States District Court for the Middle District of Alabama, Northern Division  
James K. Benefield, et al., Plaintiffs, vs. International Paper Company, Defendant.  
Civil Action No. 2:09-cv-232-WHA-TFM  
Rosenfeld Deposition July 2010, June 2011

In the Circuit Court of Jefferson County Alabama  
Jaeanette Moss Anthony, et al., Plaintiffs, vs. Drummond Company Inc., et al., Defendants  
Civil Action No. CV 2008-2076  
Rosenfeld Deposition September 2010

In the United States District Court, Western District Lafayette Division  
Ackle et al., Plaintiffs, vs. Citgo Petroleum Corporation, et al., Defendants.  
Case No. 2:07CV1052  
Rosenfeld Deposition July 2009



**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] RE: Hillcrest FPA and University Community Plan DEIR  
**Date:** Tuesday, April 30, 2024 9:33:52 AM  
**Attachments:** [Comments re Hillcrest Focus Plan and University Community Plan DEIR.pdf](#)

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**From:** everett@delanoanddelano.com <everett@delanoanddelano.com>  
**Sent:** Tuesday, April 30, 2024 8:49 AM  
**To:** DSD EAS <DSDEAS@san Diego.gov>; PLN\_PlanningCEQA <planningceqa@san Diego.gov>  
**Subject:** [EXTERNAL] RE: Hillcrest FPA and University Community Plan DEIR

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

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There was a typo on the last page of the comment letter I sent previously. Could you please replace that version with the attached.

Feel free to contact me if you have any questions.

Thank you,

Everett DeLano  
*DeLano & DeLano*  
104 W. Grand Ave., Suite A  
Escondido, CA 92025  
(760) 741-1200  
(760) 741-1212 (fax)  
[www.delanoanddelano.com](http://www.delanoanddelano.com)

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**From:** [everett@delanoanddelano.com](mailto:everett@delanoanddelano.com) <[everett@delanoanddelano.com](mailto:everett@delanoanddelano.com)>  
**Sent:** Monday, April 29, 2024 4:58 PM  
**To:** 'DSDEAS@san Diego.gov' <[DSDEAS@san Diego.gov](mailto:DSDEAS@san Diego.gov)>; 'PLN\_PlanningCEQA' <[planningceqa@san Diego.gov](mailto:planningceqa@san Diego.gov)>  
**Subject:** Hillcrest FPA and University Community Plan DEIR

Please see attached comment letter. Because of file size, I will be sending an additional comment letter under separate cover.

Please confirm receipt.

Thank you,

Everett DeLano  
*DeLano & DeLano*

104 W. Grand Ave., Suite A  
Escondido, CA 92025  
(760) 741-1200  
(760) 741-1212 (fax)  
[www.delanoanddelano.com](http://www.delanoanddelano.com)



# DELANO & DELANO

April 29, 2024

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

Re: Hillcrest Focused Plan Amendment and University Community Plan Draft EIR,  
SCH No. 2021070359

Dear City of San Diego:

This letter is submitted on behalf of Uptown United in connection with the proposed Hillcrest Focused Plan Amendment and University Community Plan (“Project”) and related Draft Environmental Impact Report (“EIR”).

## I. Introduction

The California Environmental Quality Act (“CEQA”), Pub. Res. Code §§ 21000 – 21177, must be interpreted “so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” *Friends of Mammoth v. Board of Supervisors* (1972) 8 Cal. App. 3d 247, 259. If an EIR fails to provide agency decision-makers and the public with all relevant information regarding a project that is necessary for informed decision-making and informed public participation, the EIR is legally deficient and the agency’s decision must be set aside. *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692, 712. An EIR is “aptly described as the ‘heart of CEQA’”; its purpose is to inform the public and its responsible officials of the environmental consequences before they are made. *Laurel Heights Improvement Assoc. v. University of California* (1988) 47 Cal.3d 376, 392.

“An EIR should be prepared with a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences.” CEQA Guidelines § 15151. A sufficient EIR demonstrates “adequacy, completeness and a good-faith effort at full disclosure.” *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners* (2001) 91 Cal.App.4th 1344, 1355 (quoting *Rio Vista Farm Bureau Center v. City of Solano* (1992) 5 Cal.App.4th 351, 368).

II. The Project Description is Inadequate

“An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.” *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193. The DEIR fails to provide an adequate Project description.

The DEIR identifies a “future California Coastal Commission action to approve an amended LCP,” but fails to provide any specific information as to the nature of those actions. DEIR at 3-72.

III. The DEIR’s Discussion of Project Impacts is Deficient

The DEIR fails to adequately analyze aesthetic impacts.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.
- The DEIR fails to address how extensive aesthetic impacts will be or where they will occur.

The DEIR fails to adequately analyze impacts to air quality.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.
- The attached comments from SWAPE identify deficiencies in the analysis of impacts.

The DEIR fails to adequately analyze traffic impacts.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-

ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.

The DEIR fails to adequately analyze impacts to biological resources.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.

The DEIR fails to adequately analyze greenhouse gas emission impacts.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.
- The attached comments from SWAPE identify deficiencies in the analysis of impacts.
- The DEIR identifies emissions associated with vehicle trips, yet fails to account for how these trips were calculated, since the traffic analysis failed to include such information.

The DEIR fails to adequately analyze land use impacts.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay*

*Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.

The DEIR fails to adequately analyze noise impacts.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.
- The DEIR discusses potentially significant construction and operational noise impacts but chooses to assume they would be less than significant by using an hourly average. But the temporary nature of a noise impact does not make it insignificant. See *Berkeley Keep Jets Over the Bay Comm. v. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344, 1380 – 81.

The DEIR fails to adequately analyze impacts to waters and drainages.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.

The DEIR fails to adequately analyze impacts to public services and facilities.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.



The DEIR fails to adequately analyze water supply impacts.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.
- There is an inadequate showing of water supply for the Program. The California Supreme Court recently identified three “principles for analytical adequacy under CEQA”: (1) “CEQA’s informational purposes are not satisfied by an EIR that simply ignores or assumes a solution to a problem of supplying water to a proposed land use project”; (2) “an adequate environmental impact analysis for a large project, to be built and occupied over a number of years, cannot be limited to the water supply for the first stage or the first few years”; and (3) “the future water supplies identified and analyzed must bear a likelihood of actually proving available .... An EIR for a land use project must address the impacts of likely future water sources, and the EIR’s discussion must include a reasoned analysis of the circumstances affecting the likelihood of the water’s availability.” *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 430 – 32 (emphasis in original) (citations omitted). The DEIR fails to comply with these mandates, particularly in light of recent severe water shortages throughout the State.

The DEIR fails to adequately analyze cumulative impacts.

- The DEIR fails to provide specific information on the nature or extent of development under the Project, thereby failing to provide a detailed, reasoned analysis of potential impacts. While the Project may not approve on-the-ground construction, the DEIR fails to show a good faith effort to provide an analysis of potential environmental impacts that could result from expected development. *Vineyard Area Citizens for Responsible Growth v. City of Rancho Cordova* (2007) 40 Cal.4<sup>th</sup> 412, 428; *Berkeley Keep Jets Over the Bay Comm. V. Board of Port Commissioners* (2001) 91 Cal.App.4<sup>th</sup> 1344; CEQA Guidelines §§ 15144 & 15151.
- The DEIR fails to consider the impacts associated with development of other density-adding programs and projects in concert with the Project. These include Complete Communities and other recently-approved programs to spur further development.
- Comments from Neighbors for a Better San Diego indicate that the DEIR substantially understates the potential for various programs to provide

additional development. This only further demonstrates how the DEIR fails to adequately consider cumulative impacts in a host of areas.

The EIR fails to adequately analyze growth inducement impacts.

- The DEIR claims the implementation of the Project would not be growth inducing, “rather its purpose is to direct planned growth to appropriate locations to implement existing policies.” DEIR at 6-2 and 3. Yet, the DEIR does not provide any explanation on how these policies will be integrated with Project implementation.
- Further, the DEIR provides: “with the proposed project, services will need to expand to keep ratios of personnel to population consistent with General Plan goals; however, this expansion will occur incrementally, allowing the City to adjust over time to the increased demand.” DEIR at 6-2. However, it does not provide further information on how the City plans to accommodate this increase.

Additionally, the DEIR fails to apply the City’s own CEQA Significance Determination Thresholds (“City CEQA Thresholds”). Those thresholds identify relevant criteria for consideration of environmental impacts, which the DEIR ignores. For example:

1. The DEIR fails to address potential aesthetic, visual and neighborhood character impacts by, *inter alia*, assessing whether the activity would:
  - a. “Project bulk, scale, materials, or style which would be incompatible with surrounding development?” City CEQA Thresholds at 73.
  - b. Involve “[s]ubstantial alteration to the existing or planned character of the area ...?” *Id.*
  - c. Involve “[t]he loss of any distinctive or landmark tree(s), or stand of mature trees as identified in the community plan?” *Id.*
2. The DEIR fails to address potential air quality impacts by, *inter alia*, assessing whether the activity would:
  - a. “Exceed[] 100 pounds per day of Particulate Matter ....” City CEQA Thresholds at 6.
  - b. Involve “[s]ubstantial alternation of air movement in the area ....” *Id.*
3. The DEIR fails to address potential noise impacts to by, *inter alia*, assessing whether the activity would:
  - a. “Result in land uses which are not compatible with aircraft noise levels as defined by an adopted airport Comprehensive Land Use Plan (CLUP)?” City CEQA Thresholds at 52.
4. The DEIR fails to address potential impacts to public services by, *inter alia*, assessing whether the activity would:
  - a. “conflict with the community plan in terms of the number, size, and location of public service facilities.” City CEQA Thresholds at 61.
  - b. “provide for adequate SDFD access ....” *Id.*



- c. “substantially affect Police or Fire-Rescue response times.” *Id.*
  - d. Comply with the General Plan’s guidelines and standards for libraries. City CEQA Thresholds at 62 – 63.
  - e. Comply with the General Plan’s guidelines and standards for parks and recreation resources. City CEQA Thresholds at 63.
5. The DEIR fails to address potential growth inducement impacts by, *inter alia*, assessing whether the activity would:
- a. “Induce substantial population growth in an area ...?” City CEQA Thresholds at 29.
  - b. “Substantially alter the planned location, distribution, density or growth rate of the population in an area?” *Id.*
  - c. “Include extensions of roads or other infrastructure not assumed in the community plan or Capital Improvements Project list ...? *Id.*

#### IV. The DEIR’s Discussion of Mitigation and Alternatives is Deficient

CEQA contains a “substantive mandate” that agencies refrain from approving a project with significant environmental effects if “there are feasible alternatives or mitigation measures” that can substantially lessen or avoid those effects. *Mountain Lion Foundation v. Fish and Game Comm.* (1997) 16 Cal.4<sup>th</sup> 105, 134; Pub. Res. Code § 21002. It “requires public agencies to deny approval of a project with significant adverse effects when feasible alternatives or feasible mitigation measures can substantially lessen such effects.” *Sierra Club v. Gilroy* (1990) 222 Cal.App.3d 30, 41. The DEIR is required to consider, and the City is required to adopt feasible mitigation and alternatives that can lessen or avoid the significant Project impacts. *City of Marina v. Board of Trustees of the California State Univ.* (2006) 2006 39 Cal.4<sup>th</sup> 341, 360; *see also* CEQA Guidelines § 15126.6(b).

The DEIR fails to provide sufficient degree of analysis for the planned city-wide future development and fails to adequately analyze the impacts associated with these substantial changes. Based on the analysis conducted, the DEIR found that the Project would result in significant and unavoidable impacts in 12 areas, the EIR fails to adequately discuss or consider feasible mitigation to address any of these several significant impacts. “If, as so many courts have said, the EIR is the heart of CEQA, then to continue the anatomical metaphor, mitigation is the teeth of the EIR. A gloomy forecast of environmental degradation is of little or no value without pragmatic, concrete means to minimize the impacts and restore ecological equilibrium. Thus, CEQA requires project proponents to mitigate all significant environmental impacts of their project.” *Environmental Council of Sacramento v. City of Sacramento* (2006) 142 Cal.App.4<sup>th</sup> 1018, 1039.

##### A. The DEIR’s Discussion of Mitigation is Insufficient

The EIR acknowledges significant and/or cumulative environmental impacts to “aesthetics; air quality; biological resources; cultural resources; hazards and hazardous

materials, hydrology; noise; public services; recreation; transportation; tribal cultural resources; utilities and services systems; water quality; and wildfire.” EIR at 8-1. Yet the EIR fails to adequately discuss or consider feasible mitigation to address any of these several significant impacts. *See id.* at 7-1 to 2.

For example, in discussing aesthetics impacts, the DEIR acknowledges at “this programmatic level of review without site-specific plans, impacts associated with scenic vistas would be significant.” DEIR at 4.1-13. The DEIR claims that the potential impacts would be addressed through compliance with the existing regulatory framework, “it is not possible to ensure all future impacts could be fully mitigated to less than significant” without specific plans. DEIR at 4.1-22. Yet, the DEIR fails to provide any feasible alternatives or mitigation measures at program level.

This failure is repeated for each of the acknowledged significant impacts. And in each instance, the City’s claims “of infeasibility [are not] supported by substantial evidence,” particularly since the EIR fails even to discuss or consider possible mitigation. *County of San Diego v. Grossmont-Cuyamaca Community College Dist.* (2006) 141 Cal.App.4<sup>th</sup> 86, 100 (citing Pub. Res. Code § 21081.5; CEQA Guidelines § 15091(b)).

The attached comments from SWAPE identify deficiencies in the analysis of mitigation.

B. The DEIR’s Discussion of Alternatives is Insufficient

“Under CEQA, the public agency bears the burden of demonstrating that, notwithstanding a project’s impact on the environment, the agency’s approval of the proposed project followed meaningful consideration of alternatives.” *Pesticide Action Network v. California Dept. of Pesticide Regulation* (2017) 16 Cal.App.5<sup>th</sup> 224, 247. As noted above, the EIR identifies several significant impacts. Yet it fails entirely to consider and analyze alternatives that would actually reduce or eliminate those impacts. “Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment [], the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” CEQA Guidelines § 15126.6(b) (emphasis added).

The DEIR fails to consider feasible reduced density alternatives.

Furthermore, the Project and its objectives are defined too narrowly, thereby resulting in a narrowing of the consideration of alternatives to the Program. *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1455.

City of San Diego  
April 29, 2024  
Page 9 of 9

V. The DEIR Should be Recirculated

The DEIR is sufficiently lacking that the only way to fix these issues is to revise it and recirculate an adequate report.

VI. Conclusion

For the foregoing reasons, Uptown United urges you to reject the Project and EIR as drafted. Thank you for your consideration of these concerns.

Sincerely,



Everett DeLano

Enc.

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**07: Response Everett DeLano on Behalf of Livable San Diego Comment Letter**

**07-1:** The commenter refers to the attached comment letter. The City confirmed receipt of the comment letter in an email dated May 2, 2024.

**07-2:** The commenter provides introductory language regarding the content of this comment letter. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft Program Environmental Impact Report (PEIR). Comment noted.

**07-3:** The commenter includes introductory language referencing California Environmental Quality Act (CEQA) Public Resources Code §§21000 – 21177 and CEQA Guidelines §15151. This comment does not raise an issue related to the adequacy of the analysis contained within the PEIR. Comment noted.

**07-4:** The comment addresses a concern regarding an adequate project description. The Blueprint SD Initiative, Hillcrest Focused Plan Amendment (FPA), and University Community Plan Update (CPU) are all planning level documents intended to implement the City's General Plan, Climate Action Plan (CAP), Housing Element, and other City policies and planning initiatives. The scope of the project, which includes all three planning initiatives, has been clearly defined as detailed in Chapter 3.5 of the Draft PEIR. The Blueprint SD Initiative proposes an updated policy and land use framework that would apply to all development Citywide and is intended to guide the development of future land use plan updates (e.g., Community Plan Updates [CPUs], Specific Plans, and Focused Plan Amendments [FPAs]) as well as future San Diego Municipal Code (SDMC) amendments which would help facilitate the implementation of the Blueprint SD Initiative. The Blueprint SD Initiative provides a land use framework defined by the Village Climate Goal Propensity Map, which identifies areas throughout the City where future land use plan updates should focus future land use changes that support higher density development to meet the City's CAP goals. The Blueprint SD Initiative and associated Village Climate Goal Propensity Map do not propose actual development, nor do they identify site-specific land use designations and zoning. Specific densities/intensities will be determined by future CPUs, FPAs, Specific Plans, or other plan amendments, which would involve community input similar to the community outreach process during the development of the University CPU and Hillcrest FPA. Future CPUs, FPAs, Specific Plans, or other plan amendments as well as future SDMC amendments that are developed consistent with the Blueprint SD Initiative policy and land use framework would be reviewed for consistency with the Final PEIR and associated Mitigation Monitoring and Reporting Program. Chapter 3.5.1.3 of the PEIR outlines how future CPUs or other plans/plan amendments and SDMC amendments would be evaluated in light of CEQA Guidelines Sections 15152, 15153, 15162, 15163, 15164, 15168, and/or 15183. For the Hillcrest FPA and the University CPU, the project includes the adoption of new zoning maps, with land use density and intensity ranges for their plan areas.

Issue 2 in Chapter 4.14, Transportation, of the PEIR summarizes the Vehicle Miles Traveled (VMT) analysis provided in Appendix J. As discussed under Chapter 4.14.5.2, the project would have a significant VMT impact at the program level due to residential, employment, and retail VMT exceeding 85 percent of the regional mean, which was determined to be significant because although the model results show that VMT per capita (residents) for the Blueprint SD Initiative, University CPU, and Hillcrest FPA, and VMT per employee (employment) for the Blueprint SD Initiative and Hillcrest FPA would fall below the City's significance thresholds, these model results

assume full implementation of the SANDAG Regional Plan transportation investments, for which the timing cannot be ensured. This is something that would be taken into consideration during future community plan updates. For the University CPU, even assuming full implementation of the SANDAG Regional Plan transportation investments, VMT per employee would be 85.3% of the 2016 base year regional mean, resulting in a significant VMT per employee impact under the University CPU due to the 0.3% above 85% of the 2016 base year regional mean. It is worth noting that the University VMT per employee would be reduced from 24.0 (126% of the 2016 base year regional mean) to 16.3 (85.3% of the 2016 base year regional mean) by 2050 with implementation of the University CPU and Regional Plan transportation network. Although slightly over the project level VMT threshold, this represents a very significant 32% reduction in VMT per employee. Additionally, with the University CPU and implementation of the Regional Plan transportation improvements, citywide VMT per capita is 13.9 (73% of regional mean) and citywide VMT per employee is 13.8 (72% of regional mean), both significantly below the 85% threshold. This is an overall significant net benefit in the City's efforts to reduce VMT and GHG emissions. Overall, due to the fact that the timing for completion of all the SANDAG Regional Plan transportation investments cannot be ensured and future project-specific review is required for consistency with the City's Transportation Study Manual (TSM), at a program level of review, residential and employment VMT impacts would be significant; however, retail VMT impacts under the Hillcrest FPA would be less than significant. VMT mitigation is included as MM-TRANS-1 – Achieve VMT Reductions. See also response to comment O11-8 under comment letter O11.

Updates to the land development code are detailed in Chapter 3.5.1.4. As specified therein, updates would focus on implementation of the City's vision as defined in the General Plan, Climate Action Plan (CAP), and other City policies, programs, plans and documents. Anticipated future land development code amendments are anticipated to include amendments to facilitate ministerial processing of residential and mixed-use development, updates to the Historical Resources Regulations, modifying parking regulations, changes to support development, and mobility improvements. This PEIR is a program-level document and, as such, the project description does not include project-level specifics but does provide a feasible development buildout. Future actions that may result from this PEIR will be reviewed for consistency with the PEIR in accordance with CEQA Guidelines Sections 15152, 15153, 15162, 15163, 15164, 15168, and/or 15183.

**O7-5:** The comment states that the PEIR fails to provide a description of increased density under the Blueprint SD Initiative. The Blueprint SD Initiative is a program level document that would be used in the future as a guide for future development projects, specifically in regard to environmental analysis. As described in Chapter 3.5.1, the proposed Blueprint SD Initiative amends the City's General Plan to better guide the long-range land use and policy framework for areas within the City boundaries that have medium to high (i.e., 7 through 14) village propensity values as identified in the Village Climate Goal Propensity Map. More specifically, future development projects implemented under the Blueprint SD Initiative would bring higher density residential development and mixed-use development near transit areas. Focusing future growth opportunities within these Climate Smart Village Areas will allow the City to address the goals in its CAP and mobility mode share goals by promoting opportunities to walk/roll, bike, and ride transit. See response to Comment O7-4 and O11-8.

**07-6:** Aesthetic impacts are adequately analyzed in Chapter 4.1 of the PEIR. Aesthetic impacts are evaluated based on the applicable criteria in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR.

**07-7:** See response to comment O7-4 and comment O7-5. This PEIR is a program-level document and, as such, the project description does not include project-level specifics, but does provide a feasible development buildout.

**07-8:** Chapter 4.1 of the PEIR evaluates potential impacts related to aesthetics based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR. Comment noted.

**07-9:** Air quality impacts are adequately analyzed in Chapter 4.2 of the PEIR. Air quality impacts are evaluated based on the applicable criteria in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022), and applicable air district standards. The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR. Comment noted.

**07-10:** See response to comment O7-4 and comment O7-5, above. This PEIR is a program-level document and, as such, the project description does not include project-level specifics but does provide a feasible development buildout.

**07-11:** As described in Chapter 3.5.1, the proposed Blueprint SD Initiative amends the City's General Plan to better guide the long-range land use and policy framework for areas within the City boundaries that have medium to high (i.e., 7 through 14) village propensity values as identified in the Village Climate Goal Propensity Map. More specifically, future development projects implemented under the Blueprint SD Initiative would bring higher density residential development and mixed-use development near transit areas. Focusing future growth opportunities within these Climate Smart Village Areas will allow the City to address the goals in its CAP and mobility mode share goals by promoting opportunities to walk/roll, bike, and ride transit.

Chapter 4.2.4 provides an analysis of potential air quality impacts resulting from the adoption of the Blueprint SD Initiative, University CPU, Hillcrest FPA, future LDC amendments, future CPUs, and future plan amendments consistent with the Village Climate Goal Propensity Map. The analysis includes, but is not limited to, two reasonably foreseeable hypothetical scenarios modeling a range of potential future projects that could be constructed within the project areas based on the development regulations and policies of the Blueprint SD Initiative, University CPU, and Hillcrest FPA; and an analysis of long-term operational emissions, which include mobile and area source emissions, based on the operation screening criteria shown in Table 4.2-7. Without project-specific development plans, the air quality analysis is an appropriate program-level analysis for the proposed project.

Future development projects and community plan updates, amendments, and specific plans would be reviewed for consistency with the Blueprint SD Initiative, Hillcrest FPA, and University CPU PEIR and Mitigation Monitoring and Reporting Program. Future projects within the scope of the PEIR would be evaluated in accordance with CEQA Guidelines Sections 15152, 15153, 15162, 15163,

15164, 15168, and/or 15183. As discussed in Chapter 3.5.1.3, Future Community Plan Updates, Specific Plans, and/or Focused Plan Amendments, of the PEIR, the Clairemont Mesa, College Area, and Mid-City Community Plan Updates (CPUs) are in process and are anticipated to be evaluated for consistency with the Village Climate Goal Propensity Map and this PEIR. The City will develop future community plan updates and/or focused plan amendments to ensure consistency with the Village Climate Goal Propensity Map and the land use and policy framework of the Blueprint SD Initiative.

**07-12:** See response to comment O7-4, above. The three model runs were conducted to provide VMT modeling for a range of densities that could occur with the adoption of the Blueprint SD Initiative. Model Run 1 is the low estimated density for the Blueprint SD Initiative's Climate Smart Village Areas, and Model Run 3 is the high estimated density for the Blueprint SD Initiative's Climate Smart Village Area. Model Run 2 incorporates the University CPU and Hillcrest FPA land uses, and the draft land uses for the Clairemont Mesa and College Area communities. Besides the community specific land use information in Model Run 2, the VMT modeling is not based on planned land use. The Blueprint SD Initiative and associated Village Climate Goal Propensity Map do not propose actual development, nor do they identify site-specific land use designations and zoning. The PEIR provides a good faith effort analysis of potential environmental impacts resulting from the adoption of the Blueprint SD Initiative, University CPU, Hillcrest FPA, future LDC amendments, future CPUs, and future plan amendments consistent with the Village Climate Goal Propensity Map.

**07-13:** Comment noted. Responses to the attached comments from SWAPE can be found under comments O7-67 to O7-72, below.

**07-14:** Transportation impacts are adequately analyzed in Chapter 4.14 of the PEIR. Transportation impacts are evaluated based on the applicable criteria in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR. See also response to comment O11-8.

**07-15:** See response to comment O7-4 and comment O7-5, and O11-8.

**07-16:** See response to comment O7-11, above.

**07-17:** See response to comment O7-4, O7-12, and O11-8.

**07-18:** Impacts to biological resources are adequately analyzed in Chapter 4.3 of the PEIR. Impacts to biological resources are evaluated based on the applicable criteria in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR. Comment noted.

**07-19:** See response to comment O7-4 and comment O7-5, above.

**07-20:** Impacts related to greenhouse gas emissions (GHG) are adequately analyzed in Chapter 4.7 of the PEIR. GHG impacts are evaluated based on the applicable criteria in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR.

**07-21:** See response to comment O7-4 and comment O7-5, above.

**07-22:** See response to Comment 07-11, above.

**07-23:** See response to Comment 07-4 and 07-12, above.

**07-24:** Air quality emission impacts are discussed in Section 4.2 of the PEIR. As detailed in Chapter 4.14.4, Issue 2, SANDAG's Activity Based Model (ABM) was used to calculate the project's VMT. The proposed land uses and Regional Plan mobility network were inputs to the model to develop future travel forecasts and VMT. Attachment B of Appendix J provides details on the methodology for the modeling of this project. For the project's VMT analysis the following modelling scenarios were utilized:

- Base Year (2016) – The calibrated base year model SANDAG used for the 2021 Regional Plan 2023 Amendment.
- City of San Diego Model Run 1 (2050) – Is the low estimate density for the Blueprint SD Initiative Climate Smart Village Areas, which are areas with a village propensity value of 7 through 14, with the proposed regional mobility network from the 2021 Regional Plan 2023 Amendment.
- City of San Diego Model Run 2 (2050) – Incorporates proposed land uses from the University CPU and Hillcrest FPA with the proposed regional mobility network from the 2021 Regional Plan 2023 Amendment while maintaining the Blueprint Model Run 1 unit growth for the remaining communities except in the Clairemont Mesa and College Area communities where draft proposed CPU land uses were included (e.g. land uses that align with the Village Climate Goal Propensity map).
- City of San Diego Model Run 3 (2050) – Is the high estimate density for Blueprint SD Initiative Climate Smart Village Areas with the proposed regional mobility network from the 2021 Regional Plan 2023 Amendment.

**07-25:** Comment noted. Responses to the attached comments from SWAPE can be found under comments 07-67 to 07-72, below.

**07-26:** Land use impacts are adequately analyzed in Chapter 4.10 of the PEIR. Land use impacts are evaluated based on the applicable criteria in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR.

**07-27:** See response to comment 07-4 and comment 07-5, above.

**07-28:** Noise impacts are adequately analyzed in Chapter 4.11 of the PEIR. Noise impacts are evaluated based on the applicable criteria in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR.

**07-29:** See response to comment 07-4 and comment 07-5, above.



**07-30:** The PEIR does not conclude that construction and operational noise impact would be less than significant. Construction noise impacts would be significant if they exceed the noise level limits and construction time restrictions identified in San Diego Municipal Code (SDMC) 59.5.0404 of the City's Noise Abatement and Control Ordinance. As detailed under Chapter 4.11.5.1a, construction activities related to implementation of the project would potentially generate short-term noise levels in excess of 75 dB(A)  $L_{eq}$  at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of its Noise Abatement and Control Ordinance, it is possible that some construction activities could exceed 75 dB(A)  $L_{eq}$ . However, without site-specific development details, such as the extent of construction activities and construction equipment being utilized, it is not possible to analyze noise impacts at a programmatic level of review. Therefore, impacts associated with construction noise would remain potentially significant. Mitigation measure MM-NOI-1 would require future projects to comply with the construction noise levels limits defined by SDMC 59.5.0404. If construction noise would exceed the construction noise limits, a permit would be required and would be granted by the Noise Abatement and Control Administrator. If necessary to comply with SDMC 59.5.0404, site specific noise reduction measures may be incorporated to meet property line limitations. In addition, mitigation measure MM-NOI-2 would require future projects that include pile driving and would result in vibration levels exceeding the PPV and screening distances detailed in Table 4.11-2 to implement vibration reduction measures to minimize construction-related vibration impacts. Measures shall be based on the results of site-specific recommendations from an acoustical analysis. Measures may include, but are not limited to, limiting the use of vibration-intensive equipment in proximity to sensitive receptors, installing low soil displacement piles (e.g., H-piles) instead of high soil displacement piles (e.g., concrete piles) for pile-driving, and pre-drilling for pile-driving. Other measures may include pre- and post-construction inspections to document any damage and provide repairs in the event damage occurs. However, as concluded in Chapter 4.11.7.1(a) and 4.11.7.2, even with implementation of these mitigation measures, construction noise and vibration impacts would remain significant.

Operational noise impacts would be significant if noise levels exceed the limits specified in Section 59.5.0401 et seq. of the Noise Abatement Control Ordinance. These limits are provided in Table 4.11-4 of the DEIR. While it is not anticipated that stationary sources associated with multi-family residential land uses located within the project areas would result in noise exceeding property line limits, at a programmatic level of review it cannot be ensured that all development would be able to meet property line noise limitations. The City's Noise Ordinance property line standards would apply to all future development consistent with the Blueprint SD Initiative, University CPU, and Hillcrest FPA. Although enforcement mechanisms for the violation of noise regulations in the Noise Abatement and Control Ordinance would provide for the correction of potential noise exceedances, impacts would remain potentially significant. Mitigation measures MM-NOI-1 would require future development with stationary sources of noise to comply with SDMC 59.5.0401 et seq., which specifies the maximum one-hour average sound level limits allowed at the boundary of a property. However, as concluded in Chapter 4.11.7.1(b), even with implementation of this mitigation measure, operational noise impacts would remain significant.

**07-31:** Water quality impacts are adequately analyzed in Chapter 4.17 of the Draft PEIR, which include waters and drainages. Water quality impacts are evaluated based on the applicable criteria

in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR.

**07-32:** See response to Comment O7-4 and Comment O7-5, above.

**07-33:** Chapter 4.12 of the Draft PEIR analyzes impacts to public services and facilities.

**07-34:** See response to Comment O7-4 and Comment O7-5, above.

**07-35:** Impacts to utilities and service systems are adequately analyzed in Chapter 4.16 of the Draft PEIR, which includes water supply impacts. Impacts to utilities are evaluated based on the applicable criteria in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR.

**07-36:** See response to comment O7-4 and comment O7-5, above.

**07-37:** As detailed in Chapter 4.16.5.2, water supply impacts related to implementation of the Blueprint SD Initiative would be less than significant because this planning initiative plans for anticipated growth by focusing development within Climate Smart Village Area, prioritizing higher density multi-family and mixed-use development which is more water efficient than single family land uses. At the time specific land use changes are proposed, Water Supply Assessments (WSAs) would be prepared to evaluate and document the availability of water supply over the planning horizon. Providing WSA projections based on build-out assumptions for the Blueprint SD Initiative would be speculative at this time as the land use changes have not occurred and water demand assumptions are based on more refined analysis of actual growth projections. Further, as discussed under Chapter 4.16.4, Issue 2, the water use assumptions for the Hillcrest FPA and University CPU are based on annual growth assumptions to provide a reasonable estimate of actual water demand. According to WSAs prepared for the University CPU and Hillcrest FPA, there would be adequate water supply in a normal, single-dry year, and multiple-dry year (20-year) period, to meet the estimated water demands within these communities through 2045, the water supply planning horizon. Therefore, water supply impacts related to the project would be less than significant.

**07-38:** Cumulative impacts are analyzed throughout the DEIR chapters after the impact analysis section. The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR.

**07-39:** See response to Comment O7-4 and Comment O7-5, above.

**07-40:** Chapter 3.2.3 is a summary of the Complete Communities planning initiative in the "Project Background" section of the Project Description, which briefly summarizes the four key initiatives. Complete Communities is included throughout the PEIR as an existing regulation and a cumulative condition. The City's Affordable Housing Regulations are also included throughout Chapter 4, Environmental Analysis, of the PEIR as part of the regulatory background and as a cumulative consideration.

**07-41:** The Neighbors for a Better San Diego letter can be found as comment letter O8. Programs such as Complete Communities and state mandated Accessory Dwelling Unit regulations are based on the general plan designations established within the General Plan. The environmental impacts resulting from implementation of Complete Communities Housing Solutions were analyzed in a separate EIR (SCH #2019060003). Per Public Resources Code 21080.17, CEQA includes statutory exemptions for the adoption of an ordinance by a city or county to implement specified provisions of the Planning and Land Use Law authorizing approval of granny flats and ADUs. The previous adoption of the City's ADU ordinance SDMC 141.03, which is outside of the scope of this project, was exempt from CEQA at the time it was adopted.

**07-42:** Growth inducement impacts are adequately analyzed in Chapter 6.0 of the Draft PEIR. The commenter does not raise a specific issue related to the adequacy of the analysis in the PEIR. Comment noted.

**07-43:** Chapter 6, Growth Inducement, of the PEIR includes a discussion of how CEQA and the City of San Diego define growth inducement and how the Blueprint SD Initiative, Hillcrest FPA, and University CPU are not growth inducing; rather they would direct planned growth to appropriate locations to implement existing policies, including the 2050 Regional Plan, the CAP, and the City's 6<sup>th</sup> Cycle (2021–2029) Housing Element. The Blueprint SD Initiative proposes an updated policy and land use framework that would apply to all development Citywide and is intended to guide future land use plan updates and SDMC amendments that would help facilitate the implementation of the vision in the Blueprint SD Initiative. The University CPU and Hillcrest FPA provide more specific details regarding proposed land uses and zoning throughout their respective CPU and FPA areas. Chapter 3.7, Future Actions, of the PEIR, outlines how these plans will be implemented.

**07-44:** As detailed in Chapter 4.16.6, as future development is implemented at the project-level consistent with the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA, each individual project would be required to evaluate the physical impacts of development including all utility improvements, water supply, wastewater capacity, and solid waste.

Regarding utility improvements, at a project level of review, physical impacts associated with the installation of utility infrastructure would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City.

Regarding water supply, as future CPUs, Specific Plans, or other FPAs are proposed consistent with Blueprint SD Initiative and the Village Climate Goal Propensity map, these actions would be accompanied by future WSAs, as applicable pursuant to the Water Code, to document the adequacy of future water supplies to accommodate projected growth as determined on a community basis. At the project level, WSAs may also be required for larger projects that meet specified thresholds of the Water Code. Additionally, building code and City landscape regulations would apply to ensure water efficiency in new buildings and landscapes. As discussed in the WSAs prepared for the University CPU and Hillcrest FPA, there would be adequate water supply in a normal, single-dry year, and multiple-dry year (20-year) period, to meet the estimated water demands within these communities through 2045, the water supply planning horizon.

Regarding wastewater capacity, at a project level of review, physical impacts would be avoided or minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City.

Regarding solid waste, future development would be required to implement the City's existing and future regulations related to solid waste diversion and recycling, including Waste Management Plans, to demonstrate projects are consistent with all applicable regulations related to solid waste.

**07-45:** The City's CEQA Significance Thresholds (2022) are geared toward evaluation of project specific impacts, not program-level evaluations, so prior to preparation of the Draft PEIR, City environmental staff determined the Significance Determination Thresholds for the proposed project. All sections of Chapter 4, Environmental Analysis, include a subsection that outlines the Significance Determination Thresholds used for that issue area. The thresholds are based on Appendix G of the CEQA Guidelines as well as the City's CEQA Significance Determination Thresholds (2022). In the instances that other sources were considered, i.e., the use of the Bay Area Air Quality Management District screening criteria in the Air Quality impact analysis, the PEIR discloses it and provides the reason for consideration. Significance Determination Thresholds for the project were determined in accordance with CEQA Guidelines Section 15064.7.

**07-46:** As detailed in Chapter 4.1.5.3 of the Draft PEIR, at this programmatic level of review, and without project-specific development plans, impacts associated with visual character, quality of public views, and scenic quality would be significant. Future projects that require discretionary review would undergo a project-specific environmental review which could identify additional project features and/or mitigation measures to address potential impacts regarding visual character or quality of public views and scenic quality. Additionally, future community plan updates would incorporate and be consistent with the urban design and visual quality policies in Blueprint SD.

**07-47:** Chapter 4.2, Air Quality, includes two hypothetical project analyses (residential and mixed-use) that calculate potential particulate matter per day. While individually, both hypothetical projects would result in emissions less than the significance thresholds, if several of these types of projects were to occur simultaneously within the same project area, implementation of the development anticipated under the project could exceed the significance thresholds. Similarly, the project would support increased development densities and intensities throughout the project areas, which could result in daily construction emissions which exceed those modeled under both the hypothetical projects discussed above depending on the specific location and timing of construction since air emissions from construction are localized.

Future projects would be required to adhere to mitigation measure MM-AQ-1 which provides examples of measures that could be implemented by future development to reduce construction and operational emissions. As specific development is not proposed at this time, this list is not meant to be an exhaustive list of measures. Specific project-level information would be required in order to provide project-specific mitigation measures that are most effective and would reduce project-level emissions to the extent feasible, if emissions were found to exceed the applicable thresholds.

**07-48:** As detailed in Chapter 4.10.4, Issue 2j, of the PEIR, future development consistent with the Village Climate Goal Propensity Map, the Hillcrest FPA, and the University CPU may also occur within noise compatibility zones. Applicable noise compatibility policies would apply as implemented through the City's land use plans and zoning regulations, specifically the Airport Approach Overlay Zone, Airport Environs Overlay Zone, and Airport Land Use Compatibility Overlay Zone. Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be consistent with ALUCPs and no conflict with ALUCP policies or regulations would occur as future development projects within applicable areas would continue to be subject to applicable ALUCP review, and any overrides would be considered in accordance with the ALUCP and San Diego Municipal Code.

**07-49:** Chapter 4.12.4 Issue 1a of the Draft PEIR discusses potential impacts to fire protection services, Chapter 4.12.4 Issue 1b of the Draft PEIR discusses potential impacts to police protection services, Chapter 4.12.4 Issue 1c of the Draft PEIR discusses potential impacts to libraries, Chapter 4.13.4 Issue 1 of the Draft PEIR discusses potential impacts regarding the deterioration of parks and recreational facilities, and Chapter 4.13.4 Issue 2 of the Draft PEIR discusses impacts regarding the construction or expansion of recreational facilities.

**07-50:** Chapter 6.0 of the Draft PEIR, discusses growth inducement impacts. Chapter 6.0, page 6-2 of the PEIR states,

“As detailed in the City's 6<sup>th</sup> Cycle Housing Element, San Diego is projected to add nearly 154,000 jobs between 2012 and 2035 even as the population of senior residents is projected to nearly double, growing from 11 percent to 18 percent of the population. These changes will increase demand for housing across income levels. The current 6<sup>th</sup> RHNA cycle target for the City is 108,036 new units by 2029 (City of San Diego 2021). Because the RHNA targets are set to meet the forecasted housing need, and production has historically been well below this need, the project would expand opportunities to yield higher intensity housing within appropriate areas to help accommodate planned residential growth. Implementation of the Village Climate Goal Propensity map along with adoption of the University CPU and Hillcrest FPA would facilitate housing, including higher intensity housing, in appropriate locations throughout the City; however, these actions are considered growth accommodating based on the population growth estimates referenced above and in light of regional housing shortages. Therefore, implementation of the project would not be growth inducing.”

Further, as detailed in Chapter 6.0 of the Draft PEIR, the Blueprint SD Initiative, Hillcrest FPA, and University CPU are not growth inducing; rather their purpose is to direct planned growth to appropriate locations to implement existing policies, including the 2050 Regional Plan, the CAP, and the City's 6<sup>th</sup> Cycle (2021–2029) Housing Element.

**07-51:** The comment states that the DEIR's discussion of mitigation and alternatives is deficient. The comment cites caselaw and CEQA Guidelines section 15126.6(b) but does not specify how the DEIR's discussion is deficient. The PEIR includes Chapter 8, Alternatives, which analyzes four feasible alternatives, and Chapter 9, Mitigation, Monitoring and Reporting Program, which includes mitigation for impacts to air quality, biological resources, cultural resources (historic and archaeological), noise, transportation, Tribal cultural resources, and wildfire.

**07-52:** The PEIR includes a Mitigation Monitoring and Reporting Program, which can be found in Chapter 9. Discussion of the mitigation is found throughout Chapter 4, Environmental Analysis, in the sections titled "Mitigation, Monitoring and Reporting." Additionally, the DEIR analyzes the impacts of Blueprint SD, the University CPU, and Hillcrest FPA, all of which include policies which are intended to reduce environmental impacts. Unlike a specific project proposed by a project applicant, the City through its planning documents has the opportunity to proactively plan for reduced environmental impacts, which is seen throughout each of the plans at issue here.

**07-53:** See response to Comment 07-51 and 52, above.

**07-54:** See response to Comment 07-51 and 52, above.

**07-55:** See response to Comment 07-51 and 52, above.

**07-56:** Comment noted. Responses to the attached comments from SWAPE can be found under comments 07-67 to 07-72, below.

**07-57:** Chapter 8.0 of the PEIR outlines the criteria considered to determine feasible alternatives, prior to the discussion of the four alternatives: 1. No Project Alternative, 2. High Density Alternative, 3. Blueprint SD Initiative Distributed Growth Alternative, and 4: Reduced Density Alternative. The four alternatives represent a reasonable range of alternatives, and as shown in Table 8-1 and discussed in Chapter 8.0 of the PEIR, several of the proposed alternatives reduce significant impacts to a level less than the project.

**07-58:** As detailed in Chapter 8.2.1 of the Draft PEIR, the University CPU and Hillcrest FPA High Density Alternative was determined to be environmentally superior. In the Final PEIR, this alternative was renamed to High Density Alternative and the effects of this alternative throughout the City were clarified. Specifically, throughout the Climate Smart Village Areas, increases in residential and non-residential development intensities would be achieved through corresponding changes to the base zone development regulations contained in the Municipal Code such as allowing for additional height and FAR within the Climate Smart Village Areas. The High Density Alternative was identified as environmentally superior because it would potentially reduce the significance of impacts in comparison to the project for the issues of energy, GHG emissions, and transportation. In addition, the Reduced Density Alternative has also been determined to be environmentally superior because it would potentially reduce the significance of impacts in comparison to the project for the issues of aesthetics, air quality, and noise. See also responses to comments 07-51 and 07-52.

**07-59:** The reduced density alternative is analyzed under Chapter 8.4 in the PEIR. Additional detail was added to the reduced density alternative to specify how this alternative would affect growth within the Hillcrest FPA and University CPU areas. Refer to revisions included in Final PEIR Section 8.4.1. See response to comment 07-59.

**07-60:** Please see Comment O11-6 under comment letter O11 regarding project description. Please see Chapter 8 of the PEIR for description and discussion of alternatives.

The City's General Plan provides a Citywide vision and a comprehensive approach for how to develop, provide public services, and maintain and enhance qualities that define the City of San

Diego. The overarching strategy of the General Plan is based on the City of Villages strategy, which focuses growth into walkable mixed-use activity centers that are connected through a regional transit system. The Blueprint SD Initiative includes a comprehensive amendment to the General Plan to better align the City of Villages Strategy to reflect the latest goals, policies, and plans for housing, environmental protection, and climate change adaptation and sustainable growth; and is implemented in the University CPU and Hillcrest FPA. The Blueprint SD Initiative amends the General Plan to reflect an updated citywide land use framework designed around the 2050 SANDAG Regional Transportation Plan to promote reductions in per capita greenhouse gas (GHG) emissions and vehicle miles traveled (VMT). The City's CAP identifies transportation as the biggest source of emissions in the City and the Project Objectives directly support Strategy 3, specifically Measure 3.5: Climate-Focused Land Use, of the CAP by aligning housing production with planned transportation investments to achieve GHG emission reduction targets.

**07-61:** Comment noted. The comment does not identify any basis for recirculation under CEQA Guidelines section 15088.5 or raise a specific issue related to the adequacy of the analysis in the Draft PEIR. Comment noted.

**07-62:** The comment provides conclusory language regarding the content of this comment letter. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft PEIR.

**07-63:** The comment refers to the attached comment letter.

**07-64:** The comment refers to the attached comment letter. The City confirmed receipt of the comment letter in an email dated May 2, 2024.

**07-65:** The comment states that SWAPE has reviewed the Draft PEIR and provides a summary of the project.

**07-66:** The comment summarizes the conclusions in the comment letter. Detailed responses are provided below.

**07-67:** The comment summarizes the conclusions of the PEIR regarding the identified significant construction and operational emissions impact at the associated mitigation measure MM-AQ-1. The comment states that the "DPEIR should incorporate mitigation measures that are required of future projects in order to collectively reduce the emissions and impacts associated with the proposed development under the General Plan." As detailed in Chapter 4.2.7.2 of the DPEIR:

"Federal, State, and local regulations would provide a framework for developing project-level air quality protection measures for future projects and implementation of mitigation measure MM-AQ-1 would reduce construction-related air quality impacts for future development anticipated under the project. "

"The regulations at the federal, State, and local levels provide a framework for developing project level air quality protection measures for future projects. The City's process for evaluating discretionary projects includes environmental review and documentation pursuant to CEQA as well

as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan and associated Community Plan.”

As concluded in DPEIR, impacts associated with construction and operational emissions would remain significant.

See also responses to comments O7-51 and O7-52.

**O7-68:** The comment states that MM-AQ-2 is inadequate because it does not include the requirement of construction-related HRAs. MM-AQ-2 states that “heavy industrial land uses such as warehousing and distribution or other land uses that would involve substantial sources of mobile source diesel emissions shall be required to prepare a health risk assessment (HRA) in accordance with APCD HRA Guidelines and the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics “Hot Spots” Program Risk Assessment Guidelines.” It does not only apply to operational emissions. Future projects that would require the preparation of an HRA would be required to follow OEHHA HRA Guidelines which, as referred to in the comment, requires the assessment of exposure from short-term project construction activities as well as operational sources. By referring to the OEHHA Guidelines, MM-AQ-2 implies that future HRAs would include all project-level sources of emissions.

The comments states that the DPEIR fails to evaluate the potential TAC emissions generated from future projects or indicate the concentrations at which such pollutants would trigger adverse health effects. As no specific development is proposed at this time, future concentrations of TACs cannot be calculated at this program level of analysis. Chapter 4.2.3.2(b) of the DPEIR identifies the levels at which pollutants would trigger adverse health effects. Specifically, the public notification thresholds are:

- Maximum incremental cancer risks equal to or greater than 10 in one million, or
- Cancer burden equal to or greater than 1.0, or
- Total acute non-cancer health hazard index equal to or greater than 1.0, or
- Total chronic non-cancer health hazard index equal to or greater than 1.0.

See also responses to comments O7-51 and O7-52.

**O7-69:** The comment states “the DPEIR claims that future projects would be *required* to demonstrate consistency with the City’s Climate Action Plan” and provides the following quotation from the City’s CAP Consistency Checklist:

“Projects that are consistent with the CAP as determined through the use of this Checklist may rely on the CAP for the cumulative impacts analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in this Checklist to the extent feasible.”

However, the City no longer utilizes the CAP Consistency Checklist to demonstrate consistency with the CAP. The City updated their CEQA Significance Determination Thresholds in 2022. As stated in Chapter 4.7.3.1 of the Draft PEIR:



“For plan- and policy-level environmental documents, as well as environmental documents for public infrastructure projects, the City Planning Department prepared a memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects, dated June 17, 2022, to provide guidance on significance determination as it relates to consistency with the strategies in the CAP. The City’s guidance document requires environmental documents to address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP”

The analysis correctly applies the City’s CEQA thresholds of significance for GHG and concludes impacts would be less than significant based on project consistency with the CAP and key CAP and General Plan policies. Future development under the project would not conflict with implementation of the CAP, as it would be consistent with the CAP’s goal of focusing new development in areas that would allow residents, employees, and visitors to safely, conveniently, and enjoyably travel as a pedestrian, or by biking, or transit, such as in Transit Priority Areas, and areas of the City that support existing or planned transit. Therefore, the project is intended to support the City in achieving CAP goals, specifically mode share goals, by supporting and incentivizing future development within high village propensity areas to support development in areas that have a propensity for walking/rolling, bicycling and transit use, supporting citywide VMT efficiency. The project would support the City in obtaining citywide GHG emissions reduction targets under the CAP. Accordingly, impacts related to GHG emissions would be less than significant.

The comment states, “Projects are not inherently required to be consistent with the CAP and, rather, are able to conclude less-than-significant GHG impacts several different ways. Thus, the DPEIR should formally require all future projects under the General Plan to demonstrate consistency with the City’s CAP in a mitigation measure.” Cumulative GHG impacts would be significant for any project that is not consistent with the CAP. The City’s CEQA Significance Determination Thresholds provide the following process for determining project-level significance:

For project-level environmental documents, significance is determined through 1) land use consistency and 2) project compliance with the regulations set forth in SDMC Chapter 14, Article 3, Division 14. The first step in determining CAP consistency for development projects is to assess the project’s consistency with the growth projections used in the development of the CAP.

- a. Is the proposed project consistent with the existing General Plan and Community Plan land use and zoning designations?; OR
- b. If the proposed project is not consistent with the existing land use plan and zoning designations, and includes a land use plan and/or zoning designation amendment, would the proposed amendment result in an increased density within a Transit Priority Area (TPA)?; OR
- c. If the proposed project is not consistent with the existing land use plan and zoning designations, does the project include a land use plan and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designations?

If a project cannot answer “yes” to one of the three options above, then the project’s cumulative GHG impact is significant and the project must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions. Future

development implemented under the project would be able to answer “yes” under criteria (b), at a minimum, because the project would focus development within Climate Smart Village Areas which area areas in proximity to available high-frequency transit services based on the 2050 regional transportation network, have transit access to job centers based on the 2050 regional transportation network, and have good connections between transit and destinations.

The second step in demonstrating CAP consistency is a review to ensure project consistency with the regulations set forth in SDMC Chapter 14, Article 3, Division 14 to ensure that new development is consistent with the CAP’s assumptions. Projects that are consistent with the CAP as determined through compliance with the CAP Consistency Regulations may rely on the CAP for the cumulative impacts analysis of GHG emissions per CEQA Guidelines section 15130(b)(1)(B). Projects that do not comply with the CAP Consistency Regulations set forth in SDMC Sections 143.1410 and 143.1415 must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Regulations to the extent feasible. Implementation of the CAP Consistency Regulations would be feasible at the project level.

Projects that can answer “yes” to one of the options in step 1 and comply with the regulations in step 2 would have a less than significant impact on GHG emissions, as these projects would be determined to be consistent with the CAP. Future project-level review would be required to ensure projects would be consistent with applicable plans and policies.

**07-70:** The comment states that the less-than-significant impact determination is insufficient because “By failing to quantitatively calculate the GHG emissions associated with the General Plan, the DPEIR did not make a good-faith effort at full disclosure. While projects are able to rely on the City’s CAP to evaluate GHG impacts, the size and scale of the General Plan warrants an exhaustive analysis of the associated GHG emissions.” The commenter also provides their own GHG emission calculations. The analysis contained in the PEIR correctly applies the City’s CEQA thresholds of significance for GHG. Based on the City’s memorandum, *Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects*, dated June 17, 2022, this is determined through demonstrating consistency with the goals and policies of the General Plan and the CAP. Pursuant to CEQA Guidelines sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project’s incremental contribution to a cumulative greenhouse gas (GHG) effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan. Chapter 4.7.4 Issue 2d provides a consistency analysis of the project with the six strategies of the CAP. As the project would be consistent with the CAP, it would be consistent with the CAP GHG emissions inventory and emission projections provided in the CAP, which are a more accurate disclosure of City-wide GHG emission projections than the speculative emission calculations provided in the comment letter, which does not consider the GHG emissions reductions from implementation of all six strategies of the CAP. As stated in the above-mentioned memorandum, and response to Comment O7-69 above, quantification of plan- and policy-level GHG emissions is required if the project is not consistent with the CAP. However, as concluded in the PEIR, the project would be consistent with the CAP. Therefore, no quantification is required.

The comment goes on to state that the project would not be consistent with the CAP’s goal of net zero carbon emissions by 2035. Future City actions would be needed to achieve the goals of the CAP

as outlined in the CAP and the CAP Implementation Plan. Land use is only one part of Strategy 3: Mobility & Land Use. Implementation of all six strategies of the CAP is necessary to achieve net zero carbon emissions by 2035.

**07-71:** SWAPE provides a disclaimer that states that if additional information comes available in the future they retain the right to revise or amend their report. They go on to explain that their report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties. The disclaimer is noted.

**07-72:** The City reviewed Appendix A: CalEEMod Output Files and provided a response under comment 07-70, above.

## Comment Letter O8 - Neighbors for a Better San Diego

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: Blueprint SD PEIR Comments  
**Date:** Tuesday, April 30, 2024 9:29:01 AM  
**Attachments:** [NFABSD - Blueprint SD - PEIR Comment.pdf](#)

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**From:** Geoff Hueter <[geoff\\_hueter@hotmail.com](mailto:geoff_hueter@hotmail.com)>  
**Sent:** Monday, April 29, 2024 8:43 PM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Subject:** [EXTERNAL] Blueprint SD PEIR Comments

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

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I have attached a comment letter for the Blueprint SD PEIR, including the Uptown and University plan updates.

O8-1

I look forward to your responses.

Regards,

Geoff

Geoffrey Hueter, Ph.D.  
Chair, [Neighbors For A Better San Diego](#)  
619-895-0942



April 29, 2024

To: San Diego City Planning

Re: Blueprint SD PEIR Omits Impacts for Bonus Housing Programs

The Draft Program Environmental Impact Report (PEIR) for the Blueprint SD Initiative is deficient because it treats only zoned capacity for housing and does not also calculate the amount of housing that is allowed under various San Diego bonus programs. These programs can produce roughly ten times more housing than base zoning. Also, whereas planned zoning locates housing in dense clusters close to transit (City of Village), bonus housing programs, such as Complete Communities Housing Solutions and Bonus ADUs, provide the highest economic returns in lower density areas away from transit, thereby subverting San Diego's VMT reduction goals.

O8-2

San Diego's projected housing need (Regional Housing Needs Assessment, or RHNA) for the 2021-2029 RHNA cycle is 108,036 homes. As part of its Housing Element, San Diego has calculated the capacity to build new housing under existing zoning. The resulting capacity, as of September 2021, is 174,673. This calculation, which is now several years old, has not been updated by the City based on recent Community Plan Updates (CPUs) to Kearney Mesa and Mira Mesa, nor does it reflect the increased zoned capacity in the pending University and Uptown CPUs. Combined, these CPUs may add the capacity for 100,000 to 200,000 more homes. As a result, San Diego would have the identified zoned capacity to build two to three times as many homes as are needed to meet its RNHA allocation. This exceeds the City's stated standard to provide two times overzoning (ratio of capacity to projected need), which means that further upzoning may drive up already high land prices without an appreciable increase in land turnover and housing development.

O8-3

In addition to the zoned housing capacity, San Diego parcels are eligible for bonus development under the programs listed in Table 1. The applicable housing bonus program is determined by the underlying zoning (Commercial/Multi-Family or Single-Family) and whether the parcel is inside or outside of a Sustainable Development Area (SDA), which is based on various criteria, primarily whether the parcel is within 1 mile walking distance of a transit stop (existing or future).

**Table 1. San Diego Bonus Housing Programs**

	<b>Commercial/Multi-Family</b>	<b>Single-Family</b>
<b>Inside SDA</b>	Complete Communities Housing Solutions	Bonus ADU (unlimited)
	Density Bonus	
<b>Outside SDA</b>	Density Bonus	Bonus ADU (3 ADUs per parcel)

**Complete Communities Housing Solutions (CCHS)** – Allows for development up to a floor area ratio (FAR) limit. The FAR allowance varies in different parts of the city from 2.5 in the coastal zones to 8.0 in parts of the Uptown and University communities. In general, CCHS provides many times more housing (4 times or more) than the underlying zoning.

**Density Bonus** – Allows for 50-100% increase in density over underlying zoning. While Density Bonus could be utilized inside the SDA, the much greater density allowed by CCHS and substantially lower percentage of affordable units required makes it likely that the developer would elect to use CCHS.

**Bonus ADU** – State law allows for the addition of an Accessory Dwelling Unit (ADU) and a Junior Accessory Dwelling Unit (JADU) In addition to an existing single-family home and Junior Accessory Dwelling Unit (JADU) on any single-family zoned lot. San Diego allows 2 additional ADUs anywhere in San Diego, and an unlimited number of ADUs (up to the FAR of the parcel) inside the SDA. The Bonus ADU program has produced developments of 5 or more ADUs added to a single-family parcel.

O8-3  
cont.

Neighbors For A Better San Diego has estimated the potential (allowed) housing capacity of these programs by evaluating each parcel in San Diego. Using ArcGIS, the relevant attributes were extracted for each parcel, including zoned use, lot size (expressed in square feet or acreage), and whether or not the parcel is in the SDA. These values were used to calculate the capacity of the parcel to support additional housing units. The capacities of the individual parcels were summed up to estimate the total allowed capacity for San Diego. Parcels were also summed up by Community Planning Area for comparison with community plan update proposals. (Planned and unplanned densities for the proposed Uptown and University Community Plan Updates are compared below.)

These estimates, which include the increase of CCHS allowances in the recently enacted Housing Action Package 2.0, are summarized in Table 2.

The number of units that can be built on a parcel using CCHS and Bonus ADUs are both based on allowed floor area ratios for total development. Estimating the number of units that can be built on a parcel depends on assumptions of how large the units will be. The

CCHS calculations assumed an average unit size of 700 square feet (sf) and that 25% of the floor area of the structure would be allocated to common use (hallways, reception, etc.).

The estimate of the number of Bonus ADUs that can be built in San Diego was calculated using an average unit size of 450 sf, lot size of 9,500 sf, and existing house size of 1500 sf.

**Table 2. San Diego Allowed Housing Capacity Estimate**

<b>Zone</b>	<b>Inside/Outside SDA</b>	<b># Units</b>
<b>Commercial</b>	<b>Inside SDA (units)</b>	1,257,318
	<b>Outside SDA (units)</b>	42,075
	<b>Total Commercial Capacity (units)</b>	1,299,393
<b>Single Family</b>	<b>Inside SDA (units)</b>	713,034
	<b>Outside SDA (units)</b>	302,109
	<b>Total SF Capacity (units)</b>	1,015,143
<b>Total Estimated San Diego New Home Capacity</b>	<b>Total Housing Capacity (units)</b>	<b>2,314,536</b>
	<b>RHNA Goal (units)</b>	<b>108,036</b>
	<b>Over-Capacity (relative to RHNA)</b>	<b>21x</b>

O8-3  
cont.

As can be seen from the table, San Diego's total allowed housing capacity under all housing programs (zoned + bonus) is estimated to be 2.3 million units. Noting again that San Diego's zoned capacity (Adequate Sites) is of the order of 200,000-300,000 new units, it can be seen that bonus density programs provide up to ten times the capacity for new housing as underlying zoning. This calls into question how the city can shape communities through community plan updates when the intended (planned) development is dwarfed by random bonus development.

As it relates to the Community Plan Updates in the PEIR, Uptown and University, the estimates for these communities, without any changes in the Community Plans, is 241,000 new units for Uptown and 215,000 new units for University, which vastly exceed the zoned allowed capacities anticipated for these communities. Uptown's currently adopted plan allows for 35,600 new units, with 17,000 more units being proposed as part of the pending Hillcrest Focused Plan Amendment. The total resulting zoned capacity, 52,600 new units, is only about a fourth of what could be built using Bonus programs (mostly CCHS).

O8-4

Similarly, the University Community Planning Area has an adopted capacity of 28,000 new homes, with a proposal to add capacity for 29,000 additional units as part of the pending

University Community Plan Update proposed. Even after adoption of the plan with a capacity of 57,000 new homes, the bonus capacity would be three times the zoned capacity.

O8-4  
cont.

In addition to the lack of a complete analysis of the housing capacity of the bonus housing programs, the PEIR fails to analyze the impacts due to where these programs incentivize development. For example, Complete Communities Housing Solutions may be applied to parcels that exceed a threshold of 20 dwelling units per acre (du/acre). Because the total development is determined by the FAR allowance for the parcel and the number of affordable units is only calculated on the base density, developers seek out parcels that have the lowest underlying density, thereby minimizing the obligation to provide affordable housing. This perverse incentive confounds community planning, which typically provides the highest zoning on major commercial and transit corridors, where the added density would encourage viable walkable neighborhood commercial districts. These activity hubs would also provide destinations for transit riders and thereby increase transit adoption. However, under CCHS, the most attractive sites for projects are the intended transition zones between the high-density corridors and low-density (automobile-centric) residential areas. This increases distance to transit and de-centralizes the commercial core of the community. Increasing the distance to transit discourages transit usage for neighborhood residents, and the decentralizing of activity makes it less attractive as a transit destination. Together these conditions have a negative impact on VMT reduction efforts, and, therefore, the lack of a fulsome analysis of bonus programs in the PEIR likely overestimates the VMT reductions that will be realized by the plans, including casting doubt on the assumptions of the Village Propensity Map.

O8-5

The Bonus ADU program has an even greater negative impact on VMT reduction because it is most attractive economically on parcels that are more than one-half mile from transit stops. This is a result of San Diego's parcels being larger (and hence supporting more ADUs) as the distance from transit corridors increases. These lots are more likely to be in high fire hazard zones. Numerous studies show that transit usage drops off substantially beyond one-half mile walking distance (one-quarter mile for bus service), yet Bonus ADU developments are most often located beyond one-half mile and hence reinforce automobile use for their residents.

O8-6

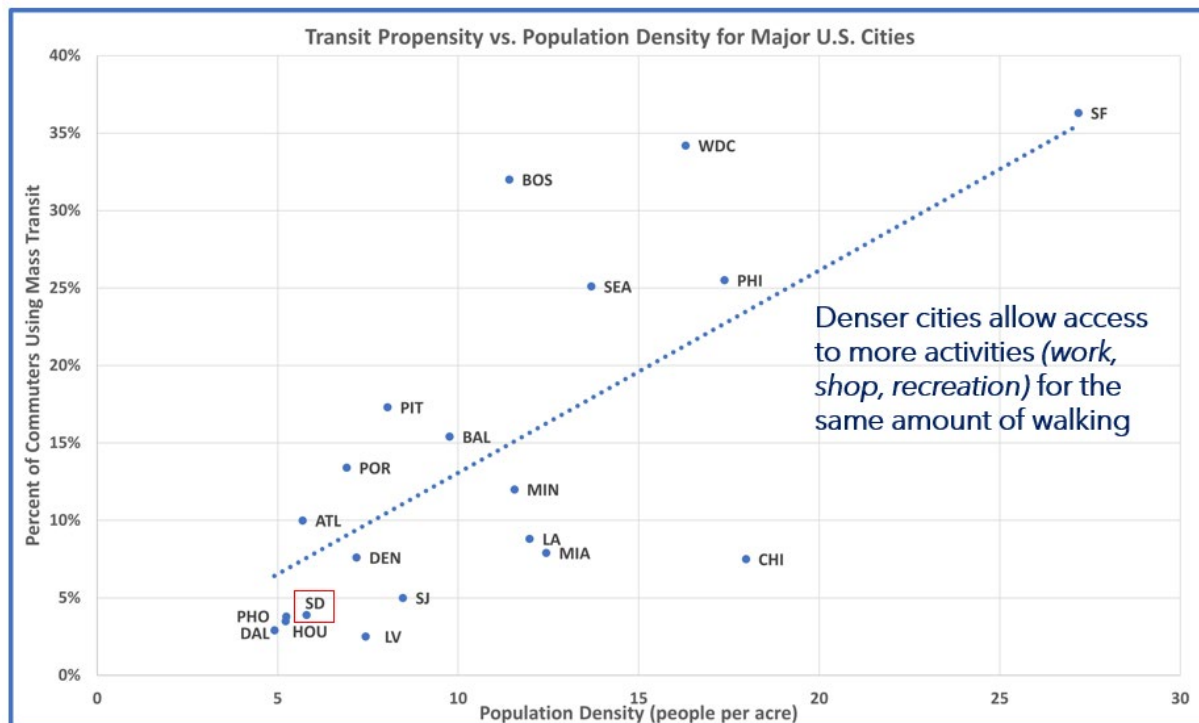
It is important to emphasize that transit usage in San Diego is suppressed by the city's average population density (see Figure 1), and that no amount of transit buildout will make it viable and efficient for the vast majority of San Diegans to utilize fixed-route transit networks (bus and rail) for commuting to work or in other daily activities. With each successive decrease in the estimate of San Diego's population growth, it is clear that San Diego should be compressing the footprint of future development so that community

O8-7



villages can achieve critical densities necessary to become viable neighborhood centers and transit destinations. This requires a horizontal form of development, not the scattered highrises produced under CCHS. This is particularly true when developments are built without parking, and without local amenities, so that a zone of exclusion is needed around the development to absorb the residents' automobiles.

**Figure 1. Population Density Determines Transit Adoption**



O8-7  
cont.

In conclusion, Neighbors For A Better San Diego recommends against acceptance of the Blueprint, University, and Uptown PEIR because the impacts of bonus development programs, resulting from the total capacity for new units and the dispersion of developments, have not been considered.

O8-8

Respectfully,

Geoffrey Hueter, Ph.D.

Chair, Neighbors For A Better San Diego

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: Blueprint SD PEIR  
**Date:** Tuesday, April 30, 2024 9:28:46 AM  
**Attachments:** [Blueprint SD Questions for PEIR.pdf](#)

---

**From:** Geoff Hueter <[geoff\\_hueter@hotmail.com](mailto:geoff_hueter@hotmail.com)>  
**Sent:** Monday, April 29, 2024 7:55 PM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Subject:** [EXTERNAL] Blueprint SD PEIR

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

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We have the following questions and comments regarding Blueprint SD Program Environmental Impact Report (PEIR):

1. The Village Propensity Map shows that there is only modest opportunity to locate housing, jobs, etc. along Mission Valley and the new Mid-Coast trolley lines. Shouldn't the most effective and accessible location for new development be along the trolley lines, which provide fixed, long-term transit routes? 08-9
  
2. Two areas that are targeted for the most densification appear to be mid-city and Barrio Logan. To be consistent with having new development near high quality jobs, this requires massive economic development in these traditionally low opportunity/low employment areas. What is the proposed plan for economic development to make this plan work? We can't just go back to the 1940s when everyone worked downtown. 08-10
  
3. San Diego's Climate Action Plan has legally mandated targets. What analysis is being done to prove that Blueprint SD will meet these goals, which vastly exceed the base requirements of a PEIR? 08-11
  
4. Creating walkable neighborhoods requires wide, shaded sidewalks. San Diego's sidewalks were created in an automobile era and are inadequate to meet the goals of Blueprint SD. How is this going to be rectified? What will be the funding mechanism for making this happen? 08-12
  
5. Blueprint SD has removed automobiles from the list of mobility priorities. Rather than wish automobiles away, shouldn't we be planning a transition to fewer automobiles? For example, separating parking from housing and other uses could be mitigated by adding parking structures, which would also include charging stations for those residents who don't have personal garages. Over time, when automobile use declines, parking structures could be torn down and replaced with other uses. 08-13
  
6. Recent community plan updates focus on zoned densities without consideration of relationships between building heights and street widths, widening sidewalks and adding shade trees, and creating coherent architecture within a neighborhood. Are these elements covered in the Blueprint SD plan? 08-14

7. In comparing San Diego to other U.S. cities, you need population densities in excess of 15 people per acre to achieve transit usage. (San Diego's current population density is under 6 people per acre.) The proposed densification footprint in the Blueprint SD map is too large to achieve these critical densities. Population density metrics have not been included in the mobility analysis. Without these metrics and analyses, it will not be possible to prove that a community plan update will result in increased transit usage, decreased VMT/GHG emissions, and mode shift changes, which are necessary to meet the legal mandates of the Climate Action Plan.

O8-15

8. Where are the areas where you envision densities of 290 du/acre? Given that over-zoning drives up land and construction costs and creates urban canyons along streets that are too narrow, is this level of upzoning justified from a noise and air quality standpoint?

O8-16

9. Is the PEIR considering fire hazard in light of ongoing drought conditions resulting from climate change and the reality of insurance carriers withdrawing from the CA market?

O8-17

10. Why isn't adaptive reuse part of this plan? This has worked in Los Angeles to create a vibrant, (relatively) affordable downtown with easy access to a variety of everyday activities. Not only does adaptive reuse provide naturally occurring affordable housing, but it also reduces construction waste, which should be a goal of San Diego's Climate Action Plan.

O8-18

I've also attached a PDF file with these questions.

O8-19

I look forward to your responses.

Regards,

Geoffrey Hueter, Ph.D.  
Chair, Neighbors For A Better San Diego



April 29, 2024

To: San Diego City Planning CEQA  
Re: Blueprint SD Questions for PEIR

We have the following questions and comments regarding Blueprint SD Program Environmental Impact Report (PEIR):

1. The Village Propensity Map shows that there is only modest opportunity to locate housing, jobs, etc. along Mission Valley and the new Mid-Coast trolley lines. Shouldn't the most effective and accessible location for new development be along the trolley lines, which provide fixed, long-term transit routes?
2. Two areas that are targeted for the most densification appear to be mid-city and Barrio Logan. To be consistent with having new development near high quality jobs, this requires massive economic development in these traditionally low opportunity/low employment areas. What is the proposed plan for economic development to make this plan work? We can't just go back to the 1940s when everyone worked downtown.
3. San Diego's Climate Action Plan has legally mandated targets. What analysis is being done to prove that Blueprint SD will meet these goals, which vastly exceed the base requirements of a PEIR?
4. Creating walkable neighborhoods requires wide, shaded sidewalks. San Diego's sidewalks were created in an automobile era and are inadequate to meet the goals of Blueprint SD. How is this going to be rectified? What will be the funding mechanism for making this happen?
5. Blueprint SD has removed automobiles from the list of mobility priorities. Rather than wish automobiles away, shouldn't we be planning a transition to fewer automobiles? For example, separating parking from housing and other uses could be mitigated by adding parking structures, which would also include charging stations for those residents who don't have personal garages. Over time, when automobile use declines, parking structures could be torn down and replaced with other uses.

O8-20

6. Recent community plan updates focus on zoned densities without consideration of relationships between building heights and street widths, widening sidewalks and adding shade trees, and creating coherent architecture within a neighborhood. Are these elements covered in the Blueprint SD plan?
7. In comparing San Diego to other U.S. cities, you need population densities in excess of 15 people per acre to achieve transit usage. (San Diego's current population density is under 6 people per acre.) The proposed densification footprint in the Blueprint SD map is too large to achieve these critical densities. Population density metrics have not been included in the mobility analysis. Without these metrics and analyses, it will not be possible to prove that a community plan update will result in increased transit usage, decreased VMT/GHG emissions, and mode shift changes, which are necessary to meet the legal mandates of the Climate Action Plan.
8. Where are the areas where you envision densities of 290 du/acre? Given that over-zoning drives up land and construction costs and creates urban canyons along streets that are too narrow, is this level of upzoning justified from a noise and air quality standpoint?
9. Is the PEIR considering fire hazard in light of ongoing drought conditions resulting from climate change and the reality of insurance carriers withdrawing from the CA market?
10. Why isn't adaptive reuse part of this plan? This has worked in Los Angeles to create a vibrant, (relatively) affordable downtown with easy access to a variety of everyday activities. Not only does adaptive reuse provide naturally occurring affordable housing, but it also reduces construction waste, which should be a goal of San Diego's Climate Action Plan.

O8-20  
cont.

I look forward to your responses.

Regards,

Geoffrey Hueter, Ph.D.  
Chair, Neighbors For A Better San Diego

**O8: Responses to Neighbors for a Better SD Comment Letter**

**O8-1:** Comment noted. No further response required.

**O8-2:** Comment noted. The commenter is correct in noting that the Draft Program Environmental Impact Report (PEIR) does not calculate the amount of housing that is available under various San Diego bonus housing programs such as the Accessory Dwelling Unit (ADU) Ordinance and the Complete Communities: Housing Solutions program.

The commenter states that the proposed Blueprint SD Initiative does not consider the potential housing that could be built through implementation of Complete Communities: Housing Solutions and the ADU Ordinance. The Complete Communities program and the City's ADU Ordinance are discussed throughout the PEIR as existing regulations and cumulative conditions; however, The Complete Communities program is not a part of the scope of the project analyzed in the Draft PEIR and the environmental impacts of the Complete Communities program were addressed in Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003).

Per Public Resources Code 21080.17, CEQA includes statutory exemptions for the adoption of an ordinance by a city or county to implement specified provisions of the Planning and Land Use Law authorizing approval of granny flats and ADUs. The previous adoption of the City's ADU Ordinance (San Diego Municipal Code [SDMC] Section 141.0302) is outside of the scope of this project and was statutorily exempt from CEQA pursuant to CEQA Guidelines Section 15282(h). Further, calculating the amount of housing that would occur under this program would be highly speculative as it would require knowledge of specific projects in specific locations that are not and cannot be known or identified. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR.

**O8-3:** The Complete Communities program and the City's ADU Ordinance are discussed throughout the PEIR as existing regulations and cumulative conditions; however, the City's ADU Ordinance and Complete Communities program is not a part of the scope of the project analyzed in the Draft PEIR. The environmental impacts of the Complete Communities program were addressed in Final Program EIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR.

**O8-4:** Comment noted. See response to Comment O8-2. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O8-5:** Comment noted. The Complete Communities program and the City's ADU Ordinance are discussed throughout the PEIR as existing regulations and cumulative conditions; however, the Complete Communities program is not a part of the scope of the project analyzed in the Draft PEIR and the environmental impacts of the Complete Communities program were addressed in Final Program EIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). This comment appears to be a critique of the Complete Communities program, is general in nature, and does not include specific critiques of the environmental analysis in the Draft PEIR; no further response is necessary.

**08-6:** Comment noted. The City's ADU Bonus program is not a part of the scope of the project analyzed in the Draft PEIR and was statutorily exempt from CEQA pursuant to CEQA Guidelines Section 15282(h). This comment is general in nature and does not include specific critiques of the environmental analysis in the Draft PEIR; no further response is necessary.

**08-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**08-8:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**08-9:** Comment noted. The comment relates to the location of new development and does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**08-10:** Comment noted. The comment relates to economic and job development and does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**08-11:** See response to Comment O2-1 under comment letter O2. The City's Climate Action Plan (CAP) has an accompanying Climate Action Implementation Plan that includes metrics for measuring success, such as number of new residential units constructed in Transit Priority Areas or Sustainable Development Areas. Future CAP Annual Reports will include updates on the City's progress toward Climate-Friendly Land Use.

**08-12:** Comment noted. The comment asks about funding mechanisms and does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**08-13:** The Blueprint SD Initiative identifies the best locations for growth and the most receptive locations that support biking, walking, and transit usage based on the Regional Travel Demand Model, to achieve the City's Climate Action Plan's (CAP's) goals. The City can meet the CAP Strategy 3 goals that support mode shift through the Blueprint SD Initiative's land use strategy and through mobility investments and programs that address travel behavior. The Blueprint SD Initiative's land use strategy is the maximum extent feasible land use scenario that – when combined with other mobility implementation strategies, which are part of the overall General Plan Refresh - can achieve the mode shift goals of the CAP. Refer also to Appendix N of the PEIR for additional information supporting how the Blueprint SD Initiative supports City mode share targets consistent with the CAP. Additionally, the Blueprint SD policies largely call for future land use plan updates to focus on increasing development capacity within the Climate Smart Village Areas as they are in or near transit priority areas (TPAs), and the proposed higher density development is considered appropriate because it would bring the City closer to meeting its CAP and General Plan goals for reducing GHG emissions and increasing mode share. Future CPUs, SPs, or plan amendments are anticipated to be developed consistent with the land use and policy frameworks in the City's General Plan and CAP and would be reviewed for consistency with the Final PEIR and Mitigation Monitoring and Reporting Program. As described in Section 4.7.4, Issue 2(a-d), the Blueprint SD Initiative, University CPU, and Hillcrest FPA would be consistent with CARB's Scoping Plan, SANDAG's Regional Plan, the GHG policies of the City of San Diego's General Plan, and the City of San Diego's CAP. By allowing for the development of high density residential and mixed-use development near existing and planned transit, the proposed land use framework would ensure the City's plans are consistent with regional

and local plans to reduce GHG emissions. See also response to comments O11-4 and O11-8 under comment letter O11.

The comment about using parking garages to assist in the transition away from vehicle use is noted. The proposed project would not preclude or eliminate the construction of parking spaces in all instances. As future development projects are proposed, appropriate parking would be provided as allowed by the zoning code restrictions for individual sites.

**O8-14:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O8-15:** See response to comment O11-8 under comment letter O11. Regarding GHG, the analysis concludes that impacts related to GHG emissions would be less than significant because the project is consistent with the CAP and is intended to implement the CAP to support a shift in mode share. The project alone is not responsible for demonstrating the targets outlined in the City's CAP. Implementation of the City's CAP is an ongoing process and future, ongoing actions will be required to achieve the targets set forth in the CAP. See also response to comment O11-9 under comment letter O11.

**O8-16:** The proposed Hillcrest FPA land use map is shown in Figure 3-8a through 3-8c of the PEIR, and the proposed land use map for the University CPU is shown in Figure 3-19 of the PEIR. The proposed housing densities and locations can be found on these two figures.

The Blueprint SD Initiative proposes an updated policy and land use framework that would apply to all development Citywide and is intended to guide future land use plan updates (e.g., Community Plan Updates [CPUs], Specific Plans, and Focused Plan Amendments [FPAs]) and future San Diego Municipal Code (SDMC) amendments which would help facilitate the implementation of the Blueprint SD Initiative. The Blueprint SD Initiative does not propose actual development, nor does it identify site-specific land use designations and zoning. Site-specific land use designations, zoning, policies, and recommendation would be brought forward during future land use plan updates.

The noise impacts of the proposed project are discussed in Chapter 4.11.4 of the PEIR, and the air quality impacts of the proposed project are discussed in Section 4.2.4 of the Draft PEIR.

**O8-17:** The commenter asks if the PEIR considers fire hazards as it pertains to drought conditions, and if insurance carriers withdrawal from the CA market was considered in the PEIR. Wildfire is discussed in Chapter 4.18 of the draft PEIR. Drought conditions are a factor used to determine CAL FIRE mapping designations, which are analyzed in Chapter 4.18.4 of the draft PEIR. CAL FIRE mapping takes into account the availability of fuel and the likelihood of an area burning based on topography, fire history, and climate. Regarding insurance carriers, this issue does not pertain to the adequacy of the Draft PEIR. No further response is required.

**O8-18:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O8-19:** Comment noted.



**O8-20:** This was a duplicate email stating the same questions above. See comments O8-9 through O8-19.

## Comment Letter O9 - Peninsula Community Planning Board

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Peninsula Community Planning Boards Comment Letter to the Draft PEIR for BluePrint SD  
**Date:** Tuesday, April 30, 2024 9:28:01 AM  
**Attachments:** [General Plan Update Comment Letter 4 18-2024 PDF.pdf](#)

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**From:** E.Javier Saunders <ejasaunderspe@gmail.com>  
**Sent:** Monday, April 29, 2024 7:24 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Kosmo Frederick W. <fkosmo@wilsonturnerkosmo.com>; Korla Eaquinta <korlajane@icloud.com>  
**Subject:** [EXTERNAL] Peninsula Community Planning Boards Comment Letter to the Draft PEIR for BluePrint SD

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

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Please see attached the Peninsula Community Planning Boards (PCPB) comment letter in response to the draft PEIR for the General Plan Update , BluePrint SD.

O9-1

As stated in the PEIR, increased densities will result in significant unmitigated environmental impacts. Identified impacts include insufficient public services, recreational facilities, and infrastructure which will have a detrimental impact to the quality of life to San Diego's.

O9-2

Blueprint SD will reduce greenspace area while increasing impervious surface areas resulting in increased surface runoff. The PEIR identifies that BluePrint SD... "would have the potential to exceed the capacity of existing or planned stormwater drainage facilities." Due to the recent devastating flooding that affected our City, the PCPB requests that a comprehensive analysis be performed to identify the increased risk of flooding and analysis of the associated run-off with increased densities proposed under BluePrint SD.

O9-3

BluePrint SD states that "Fuel-powered vehicles are the largest source of greenhouse gas emissions and pollutants impacting our air quality. The Climate Action Plan sets a goal of net zero emissions and at least half of all trips across the City will need to shift to more sustainable, climate-friendly modes like walking/rolling, biking, or taking transit. The Mobility Plan and PEIR fail to incorporate the most recent state and federal mandates that all new passenger cars will be zero-emission vehicles by 2035. PCPB requests that the City update and revise BluePrint SD and reflect the zero-emission State and Federal vehicle regulations and the overall reduction this will have to air quality and equivalent trips traveled. .

O9-4

Please see our complete comment letter attached. The Letter was approved by the Board by a 12-0 Vote.  
Should you have any questions...please feel to reach-out.

O9-5

Javier Saunders, PE  
PCPB long Range Planning Committee Chair



Peninsula Community Planning Board  
1220 Rosecrans Street PMB 549  
San Diego, CA 92106  
[pcpbsd@gmail.com](mailto:pcpbsd@gmail.com)

Date: April 18, 2024

TO: BlueprintSD@sandiego.gov

Subject: 2024 General Plan Amendment Comments, BluePrint SD

Dear Mayor Gloria, Councilmembers, and Planning Department Staff:

The City of San Diego released the update to the General Plan, BluePrint SD, on March 15, 2024 along with the associated Programmatic Environmental Impact Report (PEIR) for Public Review. Community comments are due within a short 45-day review period, April 29, 2024. BluePrint SD proposes to make substantial changes to current zoning and maximum densities that increase densities throughout the City with New York style densities of up to 290 plus units per acre along with increased densities in existing single-family neighborhoods. As stated in the PEIR, increased densities will result in significant unmitigated environmental impacts. Identified impacts include insufficient public services, recreational facilities, and infrastructure which will have a detrimental impact to the quality of life to San Diegan's.

O9-6

**The Peninsula Community Planning Board (PCPB) opposes the adoption of BluePrint SD and requests that the City of San Diego extend the comment period, provide projected numbers as to how the zoning and density changes will affect the number of units built in Point Loma and their impact on parking and infrastructure compared to the existing general plan, and provide a public outreach program which reflects the proposed vast changes in land use and character of Point Loma. The vague maps in BluePrint SD do not provide this information that is necessary for adequate public input.**

Following are PCPB comments to the General Plan update and PEIR:

### General

BluePrint SD updates the General Plan Village Propensity Map which identifies new and enlarged Village Areas with increased housing density and areas that convert low-density single-family housing to multi-housing use. As stated, this map forms the base for further updates to Community Plans. The Propensity map lacks specifics, does not define increased densities and the scale provides uncertainty to the parcels (areas) proposed for change. In addition, the maps do not provide projected housing numbers under the proposed amendments and current general plan to inform the public about the resulting changes to density, parking or infrastructure the amendments would create. These proposed changes will create densities that will resemble cities such as New York, San Francisco and Los Angeles. Many San Diegan's do not wish San Diego to morph into the densities of these cities that the plan amendments could create. **Provide Village Propensity Maps with proposed density changes (units per acre) rather than using the terms low and high. These terms are subjective and are inadequate to inform the Public.**

O9-7

The Environmental Document (Section 3.5.1.3 ) states that Community Plan Updates that are consistent with the Propensity Map and the City of Village Strategy would be evaluated consistent with the Proposed Programmatic Environmental Impact Report and proposed density and not require additional environmental review. **PCPB cannot support the adoption of the Proposed Propensity Map without greater detail and community input.**

09-8

### Increased Flooding

Blueprint SD will reduce greenspace area while increasing impervious surface areas resulting in increased surface runoff. The PEIR identifies that BluePrint SD... “would have the potential to exceed the capacity of existing or planned stormwater drainage facilities.” Due to the recent devastating flooding that affected our City, the **PCPB requests that a comprehensive analysis be performed to identify the increased risk of flooding and analysis of the associated run-off with increase densities proposed under BluePrint SD.**

09-9

### Traffic Congestion and Incomplete Transportation system

BluePrint SD and the City of Villages Strategy is based on connectivity of the regional transit system, future transit investments, and implementation of SANDAG’s 2021 Regional Plan. There is a shortfall and gap of funding for the implementation of the \$170 billion, 2021 Regional Transportation Plan. Increases in density are also proposed outside the conventional one-half mile commuter walking/rolling distance from transit. Studies and state standards have demonstrated the usage of public transportation drastically drops off beyond a one-half mile walking distance. The Blueprint SD Plan wants to designate land use density to support transit goals rather than plan transit to support existing and forecasted land use and density which is backwards planning. **PCPB requests that BluePrint SD comply with recognized standards and update the General Plan to reflect the actual public transit system rather than speculating on future funding and a non-existing transit system.**

09-10

### Greenhouse Gas Emissions (GHG)

BluePrint SD states that “Fuel-powered vehicles are the largest source of greenhouse gas emissions and pollutants impacting our air quality. The Climate Action Plan sets a goal of net zero emissions and at least half of all trips across the City will need to shift to more sustainable, climate-friendly modes like walking/rolling, biking, or taking transit. **Also, the Mobility Plan and PEIR fail to incorporate the most recent state and federal mandates that all new passenger cars will be zero-emission vehicles by 2035. PCPB requests that the City update and revise both BluePrint SD and the PEIR to reflect recognized distance to transit state standards and zero-emission vehicle regulations.**

09-11

**Local Peninsula Community Opposes BluePrint SD Density Increases.** BluePrint SD proposes to update the General Plan Village Propensity Map which identifies new and enlarged Village Areas with increased housing density. This map will form the base for further updates to Community Plans. As stated in the report and shown on the map, areas shown in purple and blue have the highest densities. The Propensity map does not define the increased density and the scale provides uncertainty to the areas proposed for density increases. PCPB cannot support the adoption of the Proposed Propensity Map without greater detail and community input.

09-12

The Village Propensity Map proposes to locate a high-density village in the Fleetridge /Wooded Area of Point Loma . This area is currently zoned single family -low density. The PCPB opposes a village strategy in this area, without community input and support. This area lacks adequate transportation, has the potential to hinder and block view corridors, and lacks the infrastructure to support high density. Page LU-6 states that residential land use designations will increase to higher uses. The Village Propensity Map recommends a conversion of single-family zoning in the Roseville neighborhood and other single-family neighborhoods in the Point Loma Community. **Clearly define the areas where single family residential land use designations are proposed for greater densities and seek community input.**

## SANDAG Series 15 Population and Housing Forecast and Consistency with BluePrint SD

As the local Planning Agency SANDAG works with local jurisdictions, the State Department of Finance, demographic and economic experts, and other stakeholders to create a long-term forecast that predicts what the region will look like in terms of population and housing. SANDAG Series 15 Population forecasts a decline in population in eleven jurisdictions in the County and only a slight growth of City San Diego's population by 5 percent by 2050. The Region's population in 2050 is expected to be only 3 percent higher than in 2022. See Attached SANDAG Series 15 Regional Forecast. **The PCPB requests that BluePrint SD maintain consistency and reflect SANDAG Series 15 population and housing projections into the General Plan Update. PCPB also requests that BluePrint SD provide a numerical projection of housing units proposed in BluePrint SD and reflect consistency with SANDAG Series 15 forecast, the Region's Local Planning Agency.**

09-13

### Mobility Element

**Bikeways.** Large sections of roadways needed for Vehicle Traffic have been converted to bikeway use thereby causing increased congestion on City Roadways, and in one case just having one lane for traffic in both directions. Bikeways in urban areas are not used nearly as much as vehicles and are seldom used by Seniors when residents need to go shopping. Policy needs to be amended to specify that bikeways will not be designed that significantly and adversely affect vehicle traffic causing vehicle congestion. Also specify that any bikeway conversion leave at least two lanes for vehicle traffic (coming and going) and that roadways will not be diverted to bicycle use where there is little to no bicycle traffic.

09-14

**Parking.** The existing general plan allows developers to pay an in-lieu fee rather than provide parking for their developments. This should not be allowed. The proposed amendments also allow the city to charge a floating parking rate to limit demand. This would be another way for the city to generate more revenue and should not be allowed because it adversely affects lower income residents. Adequate parking is needed to support development to avoid traffic congestions that these policies do not promote and should be deleted as part of the general plan amendments.

09-15

The letter was approved with a vote of 12-0.

09-16

Sincerely ,



Frederick W. Kosmo, Jr.  
PCPB-Chair

CC; SD Planning Commission  
Honorable Mayor and City Council

Attachment: SANDAG Series 15 Forecast

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**O9: Responses to Peninsula Community Planning Board Comment Letter**

**O9-1:** The introductory comment is noted. This comment does not relate to the adequacy of the Draft Program Environmental Impact Report (PEIR). No further response is required.

**O9-2:** Sections 4.12 and 4.13 of the PEIR addresses the likelihood that development in accordance with the Blueprint SD Initiative, the Hillcrest Focused Plan Amendment (Hillcrest FPA), and the University Community Plan Update (CPU) would require new public services facilities such as schools and parks and recreational facilities to maintain acceptable levels of public service.

As discussed in the Draft PEIR, buildout of these planning initiatives could require the construction of new public services facilities to accommodate growing demand, and the construction and operation of these facilities could result in environmental impacts. The Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are long-range planning documents that do not include project-specific details for specific public services facilities developments. Therefore, the potential environmental impacts associated with the construction and operation of these future facilities cannot be determined at this time. The development of future public services facilities would be subject to separate environmental review, and compliance with the regulations existing at that time could reduce potential environmental impacts associated with the construction and operation of these new facilities.

Regarding the provision of school facilities, the City and the San Diego Unified School District (SDUSD) will continue to coordinate to explore options for the provision of future school facilities as buildout of these plans occur; nevertheless, it is ultimately the responsibility of SDUSD to plan for the potential expansion of existing and/or development of new school facilities. Nevertheless, at this programmatic level of review, impacts relating to public services facilities and parks and recreational facilities are significant.

**O9-3:** As detailed in Section 4.9.4, Issue 2.b of the Draft PEIR, the Blueprint SD Initiative, University CPU and Hillcrest FPA include policies that support open space preservation, drainage management, and stormwater infrastructure improvements. These policies also support urban greening, consistent with the City's Climate Action Plan (CAP). Such design elements would help create "green streets" that incorporate vegetation, trees, soil, and engineered systems (such as permeable pavement, bioswales, etc.) to slow, filter, and cleanse stormwater runoff from impervious surfaces (e.g., concrete and asphalt). Further, the requirements for onsite site Low Impact Development (LID) BMPs, such as stormwater detention/retention BMPs set forth in the City's Stormwater Standards Manual, and required per the City's MS4 Permit, would minimize impervious areas and, as a result, simultaneously reduce project runoff and the potential transport of pollutants to the City's stormwater drainage systems. As such, implementation of the project would not result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff.

Further, as part of the City's Municipal Waterways Maintenance Program (MWMP), stormwater infrastructure maintenance needs are identified through an annual inspection and prioritization process that includes public input and a hydrologic and hydraulic analysis to determine the existing conveyance capacity of the City's stormwater conveyance system. The results of this inspection and prioritization process is shared annually with the Environment Committee of the City Council, as an

additional forum to receive public input, and published by the City as a tool to budget, prioritize and plan final engineering and environmental compliance, including identification of compensatory wetlands mitigation.

**O9-4:** Section 4.7.2.2c of the Draft PEIR details the City's 2022 Climate Action Plan (CAP) which includes a goal of net zero emissions by 2035. Additionally, Section 4.7.4, Issue 2, provides an analysis of the project's consistency with the six strategies of the City's CAP, which were developed to meet the City's GHG emissions goals.

The commenter also makes reference to the State's Advanced Clean Cars II Regulations approved by the California Air Resources Board in 2022 mandating that all new passenger cars, trucks, and SUVs sold in California be zero emission vehicles by 2035. It is worth noting that, although these State regulations may play a role in assisting the City with meeting its CAP goals, the State's Advanced Clean Cars II Regulations does not prohibit the use or sale of used gas-powered vehicles, only the sale of new ones. As such, it would be speculative to assume the rate of adoption of zero-emission vehicles and the associated air quality and VMT reductions.

Please note that the Mobility Plan is outside of the scope of this PEIR and was not analyzed in the project.

**O9-5:** Comment noted. Responses to the attached comment letter are provided under O9-6 through O9-16.

**O9-6:** The comment summarizes the Draft PEIR public review period, how Blueprint SD would increase densities, and issues found to be significant in the PEIR. Further, the comment states,

The Peninsula Community Planning Board (PCPB) opposes the adoption of Blueprint SD and requests that the City extend the comment period provide projected numbers as to how the zoning and density changes will affect the number of units built in Point Loma and their impact on parking and infrastructure compared to the existing general plan, and provide a public outreach program which reflects the proposed vast changes in land use and character of Point Loma. The vague maps in Blueprint SD do not provide this information that is necessary for adequate public input.

The Blueprint SD Initiative proposes an updated policy and land use framework that would apply to all development Citywide and is intended to guide future land use plan updates (e.g., Community Plan Updates [CPUs], Specific Plans, and Focused Plan Amendments [FPAs]) and future San Diego Municipal Code (SDMC) amendments which would help facilitate the implementation of the Blueprint SD Initiative. The Blueprint SD Initiative's land use framework is defined by the Village Climate Goal Propensity map, which is intended to guide future land use plan updates (e.g., Community Plan Updates (CPUs), Focused Plan Amendments (FPAs), Specific Plans, etc.) As described in Section 3.5.1.2, of the Draft PEIR, the Climate Smart Village Areas, which are areas with high village propensity values (values 7 through 14) as defined by the Village Climate Goal Propensity Map, would be the areas where future increases in development densities and intensities would be concentrated to help bring the City closer to reaching its CAP goals for reducing greenhouse gas (GHG) emissions. The Village Climate Goal Propensity Map does not propose actual development. It is not a land use map that identifies site-specific land use designations and zoning. It is anticipated

that future community plans and other applicable land use plans and policies would refine the General Plan's Citywide policies and provide site-specific land use designations, zoning, policies, and recommendations. As described in Section 3.5.1.3 of the Draft PEIR, future land use plan updates would be evaluated for consistency with the Blueprint SD Initiative, including the Village Climate Goal Propensity Map, and this PEIR. Depending on the scope of future projects, future environmental review for consistent projects may include tiered Mitigated Negative Declarations (MNDs), tiered EIRs, or other tiered environmental analysis in accordance with California Environmental Quality Act (CEQA) Guidelines Sections 15152, 15153, 15162, 15163, 15164, 15168, and/or 15183. This condition does not preclude the environmental analysis of future projects from happening. See response to comment O11-8.

Public services, recreation, and infrastructure impacts are discussed in Sections 4.12, 4.13, and 4.16 of the Draft PEIR, respectively.

Parking is not an issue required to be addressed by CEQA.

**O9-7:** See response to comment O9-6.

**O9-8:** See response to comment O9-6 and response to comment O11-11 under comment letter O11.

**O9-9:** See response to comment O9-3.

**O9-10:** An overarching goal of the Blueprint SD Initiative, University CPU, and Hillcrest FPA is to further the implementation of the City's CAP and support a mode shift from single occupancy vehicles to alternative mobility options such as walking/rolling, biking, and transit. This would directly support implementation of CAP Strategy 1. Additionally, proposed General Plan Policies CE-F.1 through CE-F.6 encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking/rolling. The Blueprint SD Initiative identifies the best locations for growth and the most receptive locations that support biking, walking, and transit usage based on the Regional Travel Demand Model, to attain the CAP's mode share goals. The City can meet the CAP Strategy 3 goals through the Blueprint SD Initiative land use strategy and mobility investments and programs that address travel behavior. The Blueprint SD Initiative land use strategy is the maximum extent feasible land use scenario that – when combined with other mobility implementation strategies, which are part of the overall General Plan Refresh - can achieve the mode shift goals of the CAP. Refer also to Draft PEIR Appendix N for additional information supporting how the Blueprint SD Initiative supports City mode share targets consistent with the CAP.

**O9-11:** See response to comment O9-4, above.

**O9-12:** See response to comment O9-6 and O9-8.

**O9-13:** See response to comment O11-28 under comment letter O11 regarding the SANDAG Series 15 forecast.

Also, see response to comment O9-6.



**09-14:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**09-15:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**09-16:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter O10 - San Diego Audubon Society

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] San Diego Audubon Comments on the DPEIR- Blueprint SD SCH No. 2021070359  
**Date:** Tuesday, April 30, 2024 9:29:20 AM  
**Attachments:** [2024\\_04\\_29- DPEIRBlueprintSD-SDAS Comments.pdf](#)

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**From:** Padmapriya Jagannathan <paddy.jagan@gmail.com>  
**Sent:** Monday, April 29, 2024 8:47 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Jim Peugh <peugh@cox.net>; Tershia d'Elgin <tershia@aol.com>; Andrew Meyer <meyer@sandiegoaudubon.org>; Savannah Stallings <stallings@sandiegoaudubon.org>; Muriel Spooner <murielspooner@gmail.com>  
**Subject:** [EXTERNAL] San Diego Audubon Comments on the DPEIR- Blueprint SD SCH No. 2021070359

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

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Hello Ms.Malone,

Please find attached the San Diego Audubon Society's comments on the DPEIR for Blueprint SD - SCH No. 2021070359 ((Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update). Kindly acknowledge receipt of the letter.

Thank you,  
Padma Jagannathan  
Conservation Committee  
San Diego Audubon Society

--

Spring Migration is here! Reduce light pollution and help migrating birds  
<https://www.sandiegoaudubon.org/what-we-do/lights-out-san-diego-english.html>

"It is too hard and life is too short to spend your time doing something 'cos someone else has said it is important. You must feel the thing yourself"

"A lot of mothers will do anything for their children, except let them be themselves"

O10-1

Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

April 29, 2024  
Attn: Rebecca Malone  
Senior Environmental Planner  
City of San Diego Planning Department  
9485 Aero Drive, MS 413  
San Diego, CA 92123

(Submitted by email to [planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov) on April 29th)

**Subject:** Comments on Draft Program Environmental Impact Report for the Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update/ SCH No. 2021070359

Dear Ms.Malone:

The San Diego Audubon Society offers these comments on the Draft EIR for the Blueprint SD Initiative. We specifically feel that the EIR misses the mark on

1. accounting for the ecosystem services provided by public-trust coastal lands
2. considering recreational ecological principles in its proposal of new trails especially within MSCP area
3. trail planning for Rose canyon
4. taking into account diverse nature of the canyons in San Diego
5. the number of “significant impact” environmental issues which is a glaring red flag that has to be addressed before any progress is made on these plans.

O10-2

## 1. ECOSYSTEM SERVICES

Blueprint SD PEIR Environmental Impact Analyses leave unmentioned coastal canyons’ considerable contribution to **Climate-Change Preparedness** and **Ecosystem Services**. Public open-space conservation lands represent a 24,000-acre contribution to the urban forest and the region’s biodiversity. They stabilize the developed mesas, sequester carbon, purify the air, infiltrate and cleanse stormwater and runoff, conserve water, reduce crime and cultivate community, and offer respite from urban heat islands. In light of Blueprint SD ambitions and likely eventualities, an analysis of impact on these ecosystem services is critically necessary. We invite you to use the San Diego Urban Ecosystem Analysis as your model<sup>1</sup>. Dynamic ecosystems, coastal canyons require maintenance and investment to remain functionally

O10-3

O10-4

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vitalized. Not only is the municipal government responsible for public lands' maintenance and protection, the converse is true, though ignored in this PEIR. Well maintained and protected coastal canyons can protect the public and government from disasters – such as over-capacitated infrastructure, fires, floods, disease. Poorly maintained and unprotected coastal canyons – hammered by increased infill upgradient, increased use and increased precipitation –cannot.

O10-4  
cont.

Consider the tens of millions of dollars damages in and from the once richly vegetated Maple Canyon. Down through the Laurel Street stormwater infrastructure, to Solar Turbines and the airport cargo terminal, the costs and damages are growing. As a cost-benefit analysis, please weigh these costs, or those in Chollas flooding (January 2024), against whatever municipal revenues gained from Blueprint SD. Use the same watershed-wide model.

O10-5

Adding residents and businesses in proximity to public open space will greatly stress these complex ecosystems. Before Blueprint SD is implemented, **Natural Resources Management Plans** for all public open space must occur, with management and compliance funding allocated. Otherwise, fire, flood and other avoidable disasters will occur, not as emergencies, but as exceedingly costly and possibly deadly inevitabilities for which taxpayers cannot be burdened. Insurers are already bowing out, for just these reasons. Please analyze the likelihood of San Diegans' inability to insure their properties in a denser more disaster-prone urban environment with a paupered municipality, even now unable to repair streets and infrastructure, unable to maintain parks, canyons and street trees, unable to house the unhoused.

O10-6

## 2. RECREATION ECOLOGY

As a serious update to the General Plan and community plans, at such a critical juncture, the Blueprint SD strives to help the City reach its Climate Action Plan (CAP) goals and contribute to the region's mobility vision and needs. Where mobility meets biodiversity, conscientious and thorough analyses are a necessary initial step in avoiding unforeseen and unfortunate outcomes that expose San Diego to expensive liability and damages.

O10-7

**Recreation Ecology** is the scientific study of environmental impacts resulting from recreational activity in protected natural areas. This field includes research and monitoring assessments of biophysical changes, analyses to identify causal and influential factors or support carrying-capacity planning and management, and investigations of the efficacy of educational, regulatory, and site management actions designed to minimize recreation impacts on fundamental but diminishing natural resources. These ecological understandings of

O10-8



environmental impacts of outdoor recreation are critical to the management of recreation and other mobility through natural spaces.

Canyon trails were conceived not as transit corridors, but as a means of consorting with nature. Because trails throughout the city sometimes connect with sidewalks and streets, they may be co-opted into mobility ambitions. Inexplicably, “recreation ecology” has been omitted from the Blueprint SD PEIR.

Blocked stormwater infrastructure down Laurel Street, from Maple's eroding trail system. Five years ago, while San Diego Canyonlands contractors worked on this, City estimated \$20,000,000 to fix the Laurel St infrastructure. Present work IN Maple Canyon upwards from \$17,000,000, stated to Open Space Citizens' Advisory.



O10-8  
cont.

In San Diego Audubon’s considerable experience, human incursion into conservation areas – particularly humans in a hurry – can lead to widening, paving, butchered habitat, flammable invasive weeds, erosion, slope destabilization, fire and flooding. Maple Canyon supplies one worst case example. As pictured above, sediment-caused flooding blocked access to the airport's cargo terminal more than 1/2 mile away from Maple Canyon itself.

For mobility impacts in and adjacent to public lands throughout the city, please conduct Recreation Ecology environmental impact analysis in concert with resource and wildlife agencies, in order that no negative impacts occur to dedicated conservation areas. Please include a cost/benefit analysis, as well as a source of funding for Natural Resource Management Plans and long-term open-space maintenance. The City cannot afford not to do this.

O10-9

### 3. TRAIL PLANNING IN UNIVERSITY CITY’S ROSE CANYON

O10-10



The Blueprint SD’s approach to trail planning in University City’s Rose Canyon remains misguided and exceedingly problematic. Current resource management efforts within Rose Canyon and other MSCP lands are poorly funded and inadequate, putting protected habitat and species at risk. Over and over and presently evident is that new, formalized, illegal and off-trail trails, even for just hiking and biking uses, can lead to adverse impacts.

O10-10  
cont.

Please respond to the following caveats – those already communicated to the City of San Diego Planning Department in August 12, 2022 and June 30, 2023 legal correspondence from Shute, Mihaly and Weinberger, L.L.P.

### **3-1. The City Must Consider Consistency with the MSCP Before Proposing New Trails.**

In 1997, the City of San Diego finalized the MSCP Subarea Plan to meet the requirements of the California Natural Communities Conservation Planning (NCCP) Act and to allow the City to issue take permits under the state and federal Endangered Species Acts. The City’s Multi-Habitat Planning Area (MHPA) delineates core biological resource areas and corridors targeted for conservation as part of the Subarea Plan. The Subarea Plan document identifies Rose Canyon as one of these critical conservation areas. The City must abide by the MSCP protections in place for Rose Canyon and other MHPA lands as part of its legal obligations to comply with the California Natural Communities Conservation Planning Act (NCCP) and the Federal Endangered Species Act (ESA).

O10-11

#### **A. The MSCP Subarea Plan prioritizes protection of biological resources and prohibits activities that disturb those resources.**

The MSCP Subarea Plan makes clear that “[T]he overarching MSCP goal is to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats.” Furthermore, the Subarea Plan lists management objectives for the MHPA, which includes “[T]o protect the existing and restored biological resources from intense or disturbing activities within and adjacent to the MHPA while accommodating compatible public recreational uses.”

O10-12

#### **B. The MSCP Subarea Plan prohibits locating trails in sensitive habitat areas and requires trails to follow existing dirt roads.**

The MSCP Subarea Plan lists the following as one of the General Management Directives: “Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, or the seam between

O10-13



land uses (e.g., agriculture/habitat), and follow existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotones) for longer than necessary due to the typically heightened resource sensitivity in those locations.”

O10-13  
cont.

Contrary to these Directives, the draft University City Plan (UCP) proposes several new and formalized trails directly through some of the most sensitive, least fragmented habitats in the MHPA and extends trails beyond existing dirt roads. Please eliminate these anomalies.

### **3-2 Several of the Proposed Trails are Inconsistent with MSCP Subarea Plan Policies or are Otherwise Infeasible.**

Despite failing to conduct any type of analysis for consistency with the MSCP, the draft UCP charges ahead to blindly propose areas for new and formalized trails. Figure 24 of the UCP shows the “Existing Formal Trail” in Rose Canyon, which is the only approved trail in the Rose Canyon Open Space Park. Additional trails, identified as “Existing Informal Trail – to be Closed”, have been illegally created – some through sensitive habitat. Thankfully, those trails are proposed to be eliminated. Figure 24 identifies two remaining types of trail, however: “Proposed New Trail (location to be determined)” and “Existing Informal Trail, Proposed as a Formal Trail.” Most of these trails would require extensive grading and/or intrusion into sensitive habitat, and must therefore be removed from further consideration on all UCP maps.

O10-14

A Biological Resources Report was prepared in June 2020 as part of the UCP Update (“Bio Report”), but it did not examine any of the areas within the UCP in detail or evaluate the proposed trails in the discussion draft UCP. The report contains broad information regarding the regulatory environment, an incomplete compendium of sensitive species that could exist in the Plan Area, and a summary of existing conditions. Friends of Rose Canyon has deep concerns regarding the adequacy and accuracy of this Bio Report. Yet, even the high-level summary of existing conditions in the Bio Report and the most cursory assessment of topographic conditions indicates that the proposed trails will conflict with the MSCP’s conservation mandates or are otherwise infeasible.

O10-15

Many of the proposed trails would also conflict with policies in the draft UCP recognizing the need to respect hillside and canyon areas and to avoid degradation to these areas. The UCP contains policies that identify the need to preserve topography and minimize grading, which would be impossible to accomplish given the locations of several proposed trails in steep canyon areas. For example, UCP Implementation Policy 5.4A states, “Prevent development, grading, or alterations of steep slopes greater than 25 percent grade or in open space canyons.” All of the

O10-16





proposed trails discussed are in steep open space canyons, so by the UCP's own policy guidance, these trails should not be considered.

O10-16  
cont.

#### 4. EACH SAN DIEGO CANYON IS UNIQUE

Rose Canyon is one of many conservation areas in San Diego's canyon-mesa topography. In this precious collective, every canyon is distinct, as varied as the communities on the mesas above them. Their native animal and plant communities have commonalities, but each canyon has a character of its own. These differences have many factors. Their ingresses and egresses, their proximity to schools, services, streets, fire-rescue, and evacuation –all are individual. Drainages and creek systems, receiving waters for specific watersheds, drain to different locations in the ocean and bays. Functionally unique, canyons throughout the city register different temperatures on any given day, influenced by exposures, breezes, and myriad other elements.

Canyons in old San Diego above downtown were subject to settlement earlier. They were hard-hit, mined for timber, planted and invaded by palms, eucalyptus, olives, fruit trees, grasses and weeds. These neighborhoods have mature trees. Houses and businesses are tightly packed, more walkable, but now crowded with cars and less easily exited. Such characteristics influence interactions –be they those of wildlife or humans –with the canyons.

O10-17

Canyons in outer or newer San Diego suffered less deforestation, but are still under siege from anthropogenic-caused degradation. Some, like Rose Canyon, are surrounded with ample traffic circulation.

Minus compliant and sufficient municipal maintenance, these intermittent oases rely greatly on volunteerism. Different sets of “villagers” and nonprofits steward them, each with their own ardent priorities. In these ways San Diego's urban canyons defy Blueprint SD's cookie-cutter ambitions.

#### 5. TABLE ES-1: SUMMARY OF ENVIRONMENTAL IMPACTS

**The “significance” of Environmental Impact Issues 4.1 Aesthetics, 4.2 Air Quality, 4.3 Biological Resources should be enough to stop the Blueprint SD in its tracks.**

O10-18





We know, by looking out the window at construction cranes and new multistory buildings that this sentence from Environmental Impact 4.1, Issue 3 and 4 is untrue: *Compliance with City's regulations, development standards, urban design policies, and any SDRs proposed as part of the project and as part of future CPUs, Specific Plans, and FPAs would ensure that development under the project would not substantially alter the existing visual character, quality of public views, or scenic quality of the project areas.* All San Diegans know this statement to be untrue. These effects cannot be mitigated. These enumerated Impact Analyses and Conclusions are fundamentally inadequate, outrageous even, given advancing and costly climatic disasters, mounting rate of infectious disease to which contamination, pollution, and loss of biodiversity contribute. These impacts are literal death sentences. Please correct these analyses and conclusions to be factual.

O10-18  
cont.

### 5.1 Environmental Impact 4.5 Energy

Unlike the PEIR claims, construction is an exceedingly dirty, fuel-intensive, disruptive business. Worse, the building materials themselves are fuel and chemical-intensive, acquired at significant cost, particularly to struggling nations, but also struggling communities in our own country. To quote award winning architect David Chipperfield, "The construction industry contributes an enormous amount of damage to our environment. So, we have to think about how we might mitigate that, limit that, and address that." <sup>2</sup>

The construction industry's contribution to carbon emissions and land degradation has been documented extensively by the EPA as shown below

O10-19

Furthermore, according to the EPA, construction activity can "significantly change the surface of a land" due in large part to "clearing of vegetation and excavating" which is common on many construction projects. According to the agency, the result means surrounding environments can be heavily polluted, particularly surrounding water pools, which have experienced an increase in pollution as a result of various construction projects in recent years. Additionally, research by Kleiwerks says that building material, such as concrete, aluminum, and steel, are directly responsible for "large quantities of CO<sub>2</sub> emissions" due to high contents of "embodied energy content", with 9.8 million tons of CO<sub>2</sub> generated from the production of "76 million tons of finished concrete in the US." The research also says that the construction sector's current practices at reducing pollutants, or omissions, are massively ineffective and may even "generate high levels of greenhouse gas pollution." Worryingly enough, construction activities



consume “half of all the resources” extracted from nature, and account for one-sixth of global freshwater consumption, one-quarter of wood consumption, and one-quarter of global waste,” according to the research.<sup>3</sup>

According to new research by construction blog Bimhow, the construction sector contributes to 23% of air pollution, 50% of the climatic change, 40% of drinking water pollution, and 50% of landfill wastes. In separate research by the U.S. Green Building Council (USGBC), the construction industry accounts for 40% of worldwide energy usage, with estimations that by 2030 emissions from commercial buildings will grow by 1.8%.<sup>3</sup>

No amount of prospective-not-actual transit will offset the resource extraction, manufacturing, and chemicals required for this Blueprint’s realization. Please correct this analysis and conclusion to be factual.

## 5.2 Environment Impact 4.6 Geology

We already know from erosion all around us, at construction projects and downgradient from new projects, that either the San Diego Municipal Code is inadequate or unenforced, or both, as it relates to 4.6 Geology and Soils. Look at Maple Canyon! Look at Chollas in the January 2024 flood! Look downgradient from any canyon! Therefore, please correct this Impact Analysis to be factual too.



O10-19  
cont.

O10-20



### 5.3 Environmental Impact 4.11 Noise

Construction noise, along with other sources of non-transportation noise like industrial activities and urban development, can have along with various impacts on the environment:

- **Ecosystem Disturbance:** Construction noise can disrupt natural habitats and disturb wildlife. Loud noises may cause wildlife to flee the area, disrupting their normal behavior patterns such as feeding, mating, and sleeping. It can lead to habitat abandonment or even death.
- **Noise Pollution:** Excessive noise from construction sites can contribute to noise pollution in surrounding areas. Prolonged exposure to high levels of noise can have detrimental effects on human health, including stress, hearing loss, sleep disturbances, and cardiovascular issues.
- **Hazards to Wildlife Mortality and Reproduction:** Given the density of housing one can expect increased noise levels both directly because of human density and indirectly due to increased traffic in the area. The EIR as it stands does not take into consideration the impact of noise pollution on the MHPA wildlife.

Please include these substantive impacts in your analysis.

O10-21

### 5-4 Environmental Impact 4.14 Transportation

Issue 1 and Issue 4 are deemed “less than significant” impacts and the opposition to that is stated below:

Significant impacts are expected from the development in already busy urban areas like Hillcrest, University City and elsewhere in San Diego, CA, which can have significant implications for emergency access and exits, similar to concerns in places like Maui, HI. Here's how dense development could significantly impact and influence emergency access and exits in these communities:

- **Traffic Congestion:** Dense development often leads to increased traffic congestion, especially during peak hours. In the event of an emergency, such as a fire or natural disaster, heavy traffic can impede the movement of emergency vehicles and delay response times. Narrow streets and limited parking can exacerbate congestion issues.
- **Limited Road Capacity:** Older urban neighborhoods like Hillcrest and University Heights may have narrow streets and limited road capacity, which can make it challenging for emergency vehicles to navigate effectively, especially if there are parked cars blocking access lanes. Narrow roads may also hinder the evacuation of residents during emergencies.

O10-22



- **Infrastructure Limitations:** Older urban neighborhoods may have outdated infrastructure, including narrow bridges, tunnels, and roadways, which can pose challenges for emergency access and evacuation. Infrastructure improvements may be necessary to accommodate the needs of a growing population and ensure adequate emergency response capabilities.
- **Pedestrian and Bicycle Traffic:** Dense urban areas typically have higher levels of pedestrian and bicycle traffic, which can further complicate emergency access and evacuation efforts. Emergency responders must navigate through crowded sidewalks and bike lanes to reach affected areas quickly and safely.
- **Community Design and Planning:** The layout and design of urban communities can influence emergency access and exits. Mixed-use developments, high-rise buildings, and complex street networks may require careful planning to ensure efficient emergency response and evacuation routes. Accessible pathways, designated emergency vehicle lanes, and clear signage can help facilitate emergency operations. The proposed density has not taken into consideration the increase in vehicles and impact on narrow street and the ingress and egress in an emergency, such as what happened in Maui, Hawaii. At present, Hillcrest and University City are in gridlock with traffic due to the additional, dense housing.

O10-22  
cont.

Please include these substantive impacts in your analysis.

### 5-5 Environmental Impact 4.18 Wildfire

**Issue 2:** Older communities close to downtown feature “established transportation networks,” too, but these were established for far less usage, and already suffer periods of turgid traffic. Bumper-to-bumper slowdowns and periodic stoppages are everyday. Complete Communities construction compromises by allowing developers narrower ingress/egress in exchange for advantages unrelated to fire and rescue. Moreover, open-space canyons wind through these neighborhoods with many streets ending in dead ends. SDMC Section 511.8201(f)(5)(2) is not presently prohibiting development on dead-end roads as claimed in this analysis. (See DSD Project # #458558, Variance no. 1647238, which was approved on November 3, 2021, HO-7416). Therefore, this Impact Conclusion of “Less than Significant” is untrue, categorically dangerous and must be corrected. What is the present status of the implementation of the Emergency Operations Plan, SDPD Policy and Procedures, Operational Area Emergency Plan? Is that implementation funded?

O10-23

**Issue 3:** 32<sup>nd</sup> St Canyon Task Force, Golden Hill neighbors, and former members of the Citizens for Responsible Wildfire Risk Reduction have proven present municipal brush management

O10-24



practices to be in gross violation of the City's Brush Management Regulations SDMC Section 142.0412, by means that increase rather than decrease the fire-fuel load in the midterm and over time. These damages, caused partially by underfunding, already exacerbate wildfire risks and consequences to people and property, to air quality, to the MHPA's strict federal and state habitat and species-protection commitments. Please add underfunding and MHPA commitments to the wildfire analysis.

O10-24  
cont.

**Issue 4:** Existing municipal infrastructure is poorly maintained. Departments seem to have insufficient resources for repairs and maintenance, much less new improvements. Infrastructure projects in canyons invariably destabilize slopes (Maple Canyon) (32<sup>nd</sup> St Canyon) (Chollas) and accelerate weed (annual flash fuels) growth. Again the municipal commitments to the MHPA are ignored. Please interpolate MHPA into this analysis, together with a requirement for Natural Resource Management Plans for all coastal canyons held in public-trust. With specificity, how will Blueprint SD address these regular maintenance concerns that intensify fire fuel and violate SDMC Section 142.0412?

O10-25

#### **5-6 Environmental Impact - Light Pollution and Collisions due to Glass Buildings**

The EIR does not seem to include any analysis of light pollution which is a glaring omission considering the number of studies that have been done on this topic. The American Medical Association has issued warnings about the impact of light pollution on human health<sup>4</sup>. Light pollution causes bird collisions and is one of the main contributors for bird mortality. Recently the San Diego Audubon Society has launched a Lights Out, San Diego! campaign to call attention to this issue<sup>5</sup>. While adhering to the lighting code 142.0740 is necessary, it is not sufficient especially given the proximity to a sensitive habitat. We recommend that any development adjacent to natural features and park lands adopt Dark Sky standards for lighting and commit to choosing warmer colors in the range of 2000 to 3000 K for exterior lights while striving to minimize perimeter lighting. All lights should be shielded, face away from sensitive landscapes, and be on a timer or motion-sensitive. Reducing glare, spillage, or light trespass should be mandated.

O10-26

Amendments to the California Green Building Standards Code, specifically sections AR.107.1 through AR.107.3 regarding bird-friendly building design, are scheduled to be finalized in July, and as such, we strongly encourage the incorporation of these standards in any development adjacent to natural landscapes and open spaces. A newly constructed building shall comply with the bird-friendly building design elements and features in Sections A5.107.1 through A5.107.3 of the California Energy Code. These sections are critical for reducing bird mortality due to building collisions, especially given that 1 billion birds die from building collisions annually.



Fostering the protection and appreciation



of birds, other wildlife, and their habitats...

In conclusion, we believe the EIR misses the mark on many important issues from ecosystem services provided by many of the natural landscapes, to the need to balance conservation with recreation, the unique nature of the landscapes and the significant environmental impacts that this plan can create if implemented as is. A sweeping plan such as Blueprint which can set the stage for future development in our city should be more carefully considered and cannot be allowed to proceed before glaring environmental issues are addressed. Please address the questions we have raised in our letter and perform substantive analysis of the environmental impacts before proceeding any further.

010-27

Sincerely,

James Peugh  
Conservation Chair  
San Diego Audubon Society

Tershia d'Elgin  
32nd Street Canyon Task Force

References:

1. [https://sdrufc.com/wp-content/uploads/2019/06/AmerFor\\_UrbanEcosAnalysis\\_SanDiego\\_jul03.pdf](https://sdrufc.com/wp-content/uploads/2019/06/AmerFor_UrbanEcosAnalysis_SanDiego_jul03.pdf)
2. <https://www.pbs.org/video/building-greatness-1678229367/>
3. <https://gocontractor.com/blog/how-does-construction-impact-the-environment/>
4. <https://darksky.org/resources/what-is-light-pollution/effects/human-health/>
5. <https://www.sandiegoaudubon.org/what-we-do/lights-out-san-diego-english.html>

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**O10: Responses to San Diego Audubon Society Comment Letter**

**O10-1:** Comment noted. No further response required.

**O10-2:** Comment summarizes points to be elaborated on in the letter. No further response required.

**O10-3:** The commenter notes the City's coastal canyons' contribution to climate-change preparedness and ecosystem services. See O10-4 below for response. The Conservation Element includes new policy CE-B.7 which prioritizes climate resilience and mitigation of climate change hazard impacts on open space and environmental assets to safeguard against habitat loss, protect city services and promote human health and social equity, consistent with policies in the Safety Element and Climate Resilient SD.

**O10-4:** The commenter describes the climate and environmental benefits of maintaining open-space conservation lands. The commenter also describes potential negative effects to the canyons that may result due to increased infill, use, and precipitation. The commenter recommends using the San Diego Urban Ecosystem Analysis as a model to analyze the impact of the project on the coastal canyons. There are different factors that could potentially impact open space areas directly, indirectly, and cumulatively. Direct, indirect, and cumulative biological impacts to coastal canyons are considered in the biological resources analysis, Section 4.3.4 of the Program Environmental Impact Report (PEIR). Additionally, project consistency with the City's Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) is analyzed in Section 4.10.4, Land Use, of the PEIR.

Projects in the City are required to analyze biological impacts based on the City's adopted CEQA Thresholds. Specifically, cumulative impacts are determined using the following threshold:

"The MSCP was designed to compensate for the regional loss of biological resources throughout the region. Projects that conform with the MSCP as specified by the Subarea Plan, and implementing ordinances, (i.e. July 2002 Biology Guidelines and ESL Regulations) are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP. These resources include the vegetation communities identified as Tier I through IV (see City's July 2002 Biology Guidelines, and the MSCP covered species list (see Appendix A of the City of San Diego's MSCP Subarea Plan))."

Implementation of MM-BIO-1 in addition to existing state and federal regulations would ensure that potential impacts to sensitive species, sensitive habitats and/or wetlands resulting from future development anticipated under the project would be mitigated to the extent feasible, consistent with all applicable federal, state, and City regulations and conservation plans. Potential impacts to sensitive species and/or designated critical habitat of listed species would be mitigated in accordance with City's ESL Regulations, Biology Guidelines, and the provisions of the MSCP SAP and VPHCP. Additionally, in the University Community planning area, future projects would be influenced by UCPU policy 2.9, Canyon Adjacent Development, which encourages building design to be minimally impactful to adjacent canyons and habitat.

While implementation of the City's regulatory framework typically is sufficient to ensure impacts are reduced to less than significant; at a program level of review and without project-specific details, it

cannot be known with certainty that it would be feasible to mitigate all significant impacts to less than significant. Therefore, after implementation of MM-BIO-1, impacts would remain significant.

Direct, indirect, and cumulative impacts to biological resources would then be analyzed at the time that specific development projects are proposed in accordance with the City's Biological Guidelines and ESL Regulations. Mitigation measures for biological impacts would then be incorporated as required conditions of approval for potential future development projects.

**O10-5:** The commenter requests a cost-benefit analysis be conducted considering the impacts to canyons due to future flooding using a watershed-wide model. This request is outside of the scope of environmental review of the project under CEQA. Per CEQA Guidelines Section 15126.2(a), "an EIR shall identify and focus on the significant effects of the proposed project on the environment." The commenter's request constitutes an analysis of the effect of the environment on the proposed project. As discussed in Chapter 4.9.4 of the PEIR, future development resulting from implementation of the proposed project could contribute to cumulative impacts related to hydrology, including downstream flooding, flood hazards from tsunami and mudflow, and erosion and sedimentation. However, all future development within the project areas would be required to comply with all NPDES permit requirements, and the City's Stormwater Standards Manual and Drainage Design Manual, including the implementation of Low Impact Development (LID) BMPs for stormwater treatment and hydromodification management. Cumulative downstream flooding impacts resulting from project implementation would be addressed through regulatory compliance, including compliance with the City's ESL Regulations and stormwater regulations contained in the SDMC. Additionally, the City's Stormwater Department actively maintains and repairs the City's existing stormwater infrastructure to ensure adequate stormwater conveyance through implementation of the Municipal Waterways Maintenance Plan (MWMP). Further, through the City's Climate Resilient SD plan the City is setting a policy framework for addressing how stormwater infrastructure can be improved (see Policy TNE-4 and related adaptation strategies from the Climate Resilient SD Plan). The City's Stormwater Department also conducts watershed and infrastructure planning in compliance with the City's Water Quality Improvements Plans (WQIPS) which includes watershed scale modeling and project prioritization for upgrading existing stormwater infrastructure and identifying new infrastructure needs. The Blueprint SD Initiative, University CPU and Hillcrest FPA also include policies that support the protection of canyons from erosion within the City, including but not limited to: increasing the use of green infrastructure, both at watershed scale and site-specific locations, in order to minimize the quantity of runoff, disruption of natural water flows, and the contamination of stormwater flows generated by development projects (General Plan Conservation Element Policy CE-E.2.j); maintaining storm drain discharge systems to prevent erosion and improve water quality by adequately controlling flow and providing filtration (University CPU Policy 5.5.H); and designing green streets to incorporate enhanced pedestrian and bicycle facilities, canopy street trees, and stormwater features that increase absorption of stormwater, urban runoff, pollutants, and carbon dioxide (Hillcrest FPA Policy UD-3.57).

**O10-6:** The commenter describes concern for increased density in proximity to open space. Please refer to comment O15-5 under comment letter O15 and comment O10-4 for more information. The commenter states that Natural Resources Management Plans for all public open space must occur. Please see comment O11-41 under comment letter O11 for further information regarding the preparation of Natural Resources Management Plans. Additionally, the commenter requests an



analysis of the likelihood of San Diegan's inability to insure their properties. Regarding the Natural Resources Management Plan comment, this comment pertains to the development of a plan which is outside of the scope of the project and doesn't raise issues regarding the adequacy of the Draft PEIR. Regarding the insurance analysis, this comment pertains to the analysis of the impact of future development associated with the project on ability of homeowners to obtain homeowners insurance. Per CEQA guidelines section 15384, "[...] economic impacts which do not contribute to or are not caused by physical impacts on the environment [do] not constitute substantial evidence[,]" and therefore do not need to be analyzed as part of the environmental analysis provided in the PEIR.

**O10-7:** The commenter states that an analysis of "where mobility meets biodiversity" is necessary to avoid liability. This analysis is outside the scope of this PEIR.

**O10-8:** The commenter states the definition of Recreation Ecology. The commenter goes on to state that the use of canyon trails for mobility (i.e. pedestrian linkages) rather than for recreational use, would lead to widening, paving, butchered habitat, invasive weeds, erosion, slope destabilization, fire and flooding. The proposed trails have been removed from the University CPU, the project description in Section 3.5.3(e) of the Draft PEIR, from Figure 3-26 of the Draft PEIR, and from the impact analysis in Section 4.3.4, Issue 4, of the Draft PEIR.

**O10-9:** The commentor requests a Recreation Ecology environmental impact analysis be conducted to determine impacts in and adjacent to public lands throughout the City. As described in response to comment O10-4, potential impacts to sensitive species and/or designated critical habitat of listed species resulting from future projects resulting from implementation of the project would be mitigated in accordance with City's ESL Regulations, Biology Guidelines, and the provisions of the MSCP SAP and VPHCP.

The commenter also requests an economic analysis regarding the maintenance of open-space areas. This is outside of the scope of this project and does not raise issues regarding the adequacy of the Draft PEIR. Please see response to comment O11-43 under comment letter O11 for more information regarding funding for the MSCP. No further response required.

**O10-10:** The proposed trails have been removed from the University CPU, the project description in Section 3.5.3(e) of the Draft PEIR, from Figure 3-26 of the Draft PEIR, and from the impact analysis in Section 4.3.4, Issue 4, of the Draft PEIR.

**O10-11:** The commenter states that the City must consider consistency with the MSCP before proposing new trails. The proposed trails have been removed from the University CPU, the project description in Section 3.5.3(e) of the Draft PEIR, from Figure 3-26 of the Draft PEIR, and from the impact analysis in Section 4.3.4, Issue 4, of the Draft PEIR. See response to comments A3-5, A3-7, A3-10, A3-18, A3-20, and A3-25 under comment letter A3 for a discussion of how the proposed project enforces the MSCP SAP.

**O10-12:** This comment cites various regulatory requirements and requirements of the City's MSCP Subarea Plan but does not raise a specific issue with the adequacy of the Draft PEIR.

**O10-13:** See response to comment O10-10.

**O10-14:** The commenter states that there was no MSCP consistency analysis for the draft UCP. The MSCP consistency analysis in the Land Use section, Chapter 4.10, of the PEIR. The comment also refers to “Proposed New Trail (location to be determined)” and “Existing Informal Trail, Proposed as a Formal Trail” as described in the UCP. See response O10-10.

**O10-15:** The commenter refers to the biological resources report prepared for the University Community Plan Update, and states that the biological resources report did not analyze in detail the proposed conceptual trails discussed in the UCP. See response to comment O10-10.

**O10-16:** See response O10-11.

**O10-17:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR.

**O10-18:** The commenter states that significant and unavoidable conclusions for aesthetics, air quality, and biological resources indicate that the project should not be approved.

The commenter continues to state that environmental impacts related to public views, visual character, and scenic quality cannot be mitigated. Chapter 4.1.4 describes numerous policies which specifically address these impacts. Refer to Chapter 4.1.4 of this PEIR for a detailed description of applicable policies pertaining to preservation of scenic views and quality. Future discretionary projects resulting from implementation of the project would be required to undergo a project-specific environmental review at the appropriate future time which would identify additional project features and/or mitigation measures to address potential impacts to scenic vistas. Additionally, compliance with the regulations in existence at the time the development is proposed would reduce potential environmental impacts related to scenic vistas and public views.

The commenter also refers to potential biological impacts. Refer to response to comment O10-4.

**O10-19:** The commentor describes the construction industry’s general environmental impacts, which is outside the scope of this Draft PEIR. They indicate that implementation of the project will not offset construction related impacts, including air quality, energy, GHG, and hazardous materials impacts. As described in Chapter 4.2.4, Issue 2 (a), of the Draft PEIR, two hypothetical scenarios for construction projects were assessed. Since individual construction projects would occur over a period of time, and because the exact timing, location, and size of future projects is not known at this time, construction-related air quality impacts are considered significant. Potential significant impacts are mitigated to the extent feasible through MM-AQ-1, and future ministerial and discretionary projects would be required to follow these measures. As described in Chapter 4.5.4, Issue 1, of the Draft PEIR construction of development facilitated by the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would not result in the use of excessive amounts of fuel or other forms of energy and impacts would be less than significant. Development pursuant to the Blueprint SD Initiative, Hillcrest FPA, and University CPU would primarily be infill development near public transit or in otherwise VMT-efficient areas, consistent with the City’s Climate Action Plan (CAP). As described in Chapter 4.7.3.1 of the Draft PEIR, the City uses a consistency analysis in lieu of quantifying GHG emissions to determine significant impacts consistent with CEQA Guidelines Section 15183.5. The City Planning Department prepared a memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects, dated June 17,

2022, to provide guidance on significance determinations as it relates to consistency with the strategies in the CAP. The City's guidance document requires environmental documents to address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP. The project would support the City in obtaining citywide GHG emissions reduction targets under the CAP and impacts related to GHG emissions would be less than significant. Finally, as described in Chapter 4.8.4, Issue 1, although future development and construction activities associated with development contemplated by the project could involve the transport, use, or disposal of hazardous materials, compliance with applicable federal, state, and local regulations would ensure that regulated hazardous materials are handled and disposed of properly. The project would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; and impacts related to hazardous materials would be less than significant.

The commenter describes their concern regarding the incorporation of SANDAG's 2021 Regional Transportation Plan in the environmental analysis of the Draft PEIR. See response to comment O11-18 under comment letter O11.

**O10-20:** The commenter suggests that the SDMC is inadequate or unenforced as it relates to controlling erosion and flooding (geology and soils impacts) from previous projects not within the scope of the Draft PEIR. The comment does not address the adequacy of Chapter 4.6, Geology and Soils, in the Draft PEIR.

**O10-21:** The commenter notes correctly that construction noise can have noise-related impacts on the environment. These impacts are analyzed and mitigation measures are provided which address these concerns in the biology section (Chapter 4.3.4, Issue 2) and the noise section (Chapter 4.11.4) of the PEIR. Further, as described in Chapter 4.10, the City's Multiple Species Conservation Plan Subarea Plan (MSCP SAP) provides Land Use Adjacency Guidelines to avoid or reduce significant indirect impacts to the City's Multiple Habitat Planning Area (MHPA) from adjacent land uses. The MSCP establishes adjacency guidelines to be addressed on a project-by-project basis to minimize direct and indirect impacts and maintain the function of the MHPA. The Land Use Adjacency Guidelines would be incorporated as project conditions of approval, which would preclude indirect impacts to the MHPA. Note that MHPA adjacency guidelines would apply to both land within the MHPA and land as part of the Verna Pool Habitat Conservation Plan (VPHCP).

**O10-22:** The commenter describes opposition to impact conclusions for Issue 1 and Issue 4 for the transportation section (Chapter 4.14) of the Draft PEIR. For a response to the comment on traffic congestion, limited road capacity, and other flow limitations, see response to comment O13-2 under comment letter O13. Pedestrian and bicycle safety is discussed in Chapter 4.14.4, Issue 1, of the Draft PEIR. The Blueprint SD Initiative, University CPU, and Hillcrest FPA include numerous policies and proposed infrastructure improvements that would improve safety for pedestrian, bicycle, transit, and roadway facilities. For a discussion of emergency access, see response to comment O13-3 under comment letter O13.

**O10-23:** For a response to the comment on traffic congestion, limited road capacity, and other traffic flow limitations, see response to comment O13-2 under comment letter O13. The Complete Communities program is not a part of the scope of the project analyzed in the Draft PEIR and the environmental impacts of the Complete Communities program were addressed in the Final PEIR for

Complete Communities: Housing Solutions and Mobility Choices (SCH No. 201906003). For a discussion of emergency access, see response to comment O13-3 under comment letter O13.

The commenter states that a previously approved variance allowed development on a dead-end road, which would conflict with SDMC Section 511.8201(f)(5)(2). The aforementioned development project was approved on November 3, 2021, by the Hearing Officer of the City of San Diego (Resolution HO-7416). The specific SDMC section referenced above was adopted by the San Diego City Council on January 27, 2022, and was made effective February 26, 2022 (Ordinance O-21409). Therefore, the previously approved variance occurred prior to the preparation of the components of the project analyzed in this Draft PEIR and could not yet apply. Furthermore, the variance referred to was reviewed and analyzed independently of this project.

**O10-24:** The commenter states that municipal implementation of SDMC brush management regulations is inadequate due to underfunding, having an effect upon management of the MHPA in accordance with the MSCP Implementing Agreement between the City, USFWS, and CDFW. Comment noted. This comment is outside of the scope of this project and does not relate to the adequacy of the Draft PEIR. See Chapter 4.18.6 of the PEIR for the program-level mitigation framework for reducing significant impacts related to wildfire.

**O10-25:** This comment states that municipal infrastructure is poorly maintained. The infrastructure discussed in Chapter 4.18.4, Issue 4 (it references Chapter 16.4, Issue 1) refers to the infrastructure needed to prevent and control wildfires (e.g., roads, fuel breaks, emergency water sources, power lines, or other utilities). As described in the section, the physical impacts associated with the installation or maintenance of infrastructure and utilities would be significant. Future utility and infrastructure improvements would be required to comply with all applicable City standards; thus, these improvements are not likely to exacerbate fire risk. It is not likely that these infrastructure improvements would be built on MHPA land; however, they would be required to comply with the City's ESL regulations, Biology Guidelines, MSCP SAP, and VPHCP.

The comment also refers to management of the MHPA, which is outside of the scope of this project. Please see response to comment O4-27 under comment letter O4 for further information regarding the management of the MHPA

Regarding the Natural Resource Management Plan, refer to response to comment O11-41. Please see response to comment O11-43 under comment letter O11 for more information regarding funding for the MSCP

**O10-26:** The commenter states that the Draft PEIR does not contain an analysis of light pollution. See Chapter 4.1.4, Issue 5, of the Draft PEIR for an analysis of light pollution. All future development is required to comply with California Green Building Standards Code, SDMC Section 142.0730, Glare Regulations, and SDMC 142.0740, Outdoor Lighting Regulations [see Chapter 4.1.2.2 (b) of the Draft PEIR]. Additionally, see the discussion in Section 4.10.2(h) for consistency with the City's MSCP SAP and Chapter 4.10.4, Issue 2(f), of the Draft PEIR for an analysis of consistency with the City's MSCP SAP Land Use Adjacency Guidelines.

**O10-27:** The commenter states opposition to the project. Comment noted.

## Comment Letter O11 - Sierra Club

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on the City of San Diego's Draft Blueprint SD Initiative, Hillcrest Focused Plan Amendment, and University Community Plan Update Program EIR  
**Date:** Tuesday, April 30, 2024 9:25:55 AM  
**Attachments:** [2024-04-29 CBLG Blueprint PEIR Letter\\_fnl.pdf](#)

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**From:** Katie Pettit <kmp@chattenbrownlawgroup.com>  
**Sent:** Monday, April 29, 2024 5:35 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Blueprint San Diego <BlueprintSD@sandiego.gov>  
**Cc:** Josh Chatten-Brown <jcb@chattenbrownlawgroup.com>; Isabella Coye <igc@chattenbrownlawgroup.com>  
**Subject:** [EXTERNAL] Comments on the City of San Diego's Draft Blueprint SD Initiative, Hillcrest Focused Plan Amendment, and University Community Plan Update Program EIR

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

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Hello,

On behalf of the Sierra Club, please see the attached comments on the City of San Diego's proposed Draft Blueprint SD Initiative, Hillcrest Focused Plan Amendment, and University Community Plan Update Program EIR, SCH No. 2021070359.

We request confirmation of receipt of this email and the attached comments. Thank you.

Sincerely,  
Katie Pettit

O11-1



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April 29, 2024

Via email to [planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov), [blueprints@sandiego.gov](mailto:blueprints@sandiego.gov)

**Re: Comments on the City of San Diego’s Draft Blueprint SD Initiative, Hillcrest Focused Plan Amendment, and University Community Plan Update Program EIR, SCH No. 2021070359**

On behalf of the San Diego Sierra Club Chapter, we provide the following comments on the City of San Diego’s draft Program EIR (“PEIR”) for its proposed Blueprint SD Initiative (“Blueprint” or “Project”), Hillcrest Focused Plan Amendment (“FPA”), and University Community Plan Update (“CPU”). Our clients support policies that encourage transit oriented development, and a data driven approach for determining where to increase density in the City. Blueprint’s stated goal of steering away from auto-oriented development is laudable.

O11-1  
cont.

O11-2

But, the devil is in the details. And unfortunately, the PEIR lacks crucial information about how, when, and where promised future transit infrastructure will occur, and fails to require implementation of promised transit infrastructure, or provide safeguards in the event that promised transit does not emerge.

O11-3

Further, the PEIR notes that Blueprint will increase density *outside* of the Climate Smart Village Areas, including “citywide,” but fails to adequately disclose, analyze, and mitigate the impacts of increased development intensity in areas that are not located close to transit. Failure to incorporate mitigation for increased development in areas known to increase greenhouse gases (“GHG”) and Vehicles Miles Travelled (“VMT”) undermines both the City and Blueprint’s stated goals.

O11-4

Finally, the fact that the PEIR involves review only at the programmatic level does not absolve the City from incorporating feasible mitigation measures, especially for impacts to air quality, biological resources, greenhouse gas emissions, land use, biological resources and the Multiple Species Conservation Program, into the PEIR.

O11-5

**I. The PEIR Fails to Provide an Adequate Project Description**

The California Environmental Quality Act (“CEQA”) requires a clear project description of the project being approved. This project description must be stable, finite, and unambiguous, and a project description that gives “conflicting signals to decision makers and the public about the nature of the project is fundamentally inadequate and misleading.” (*Southwest Regional Council of Carpenters v. City of Los Angeles* (2022) 76 Cal.App.5th 1154, 1173–74.)

O11-6

**A. The PEIR Fails to Provide a Clear Description of the Project, Including Where Development Intensities Are Being Increased**

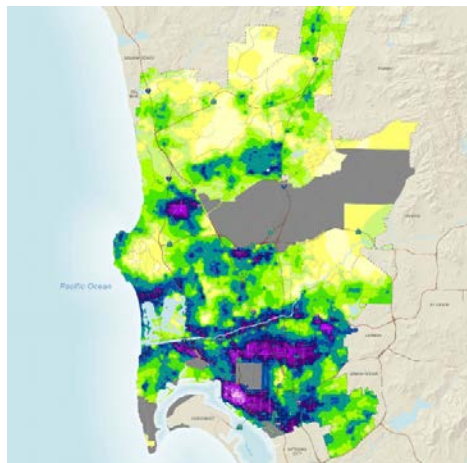
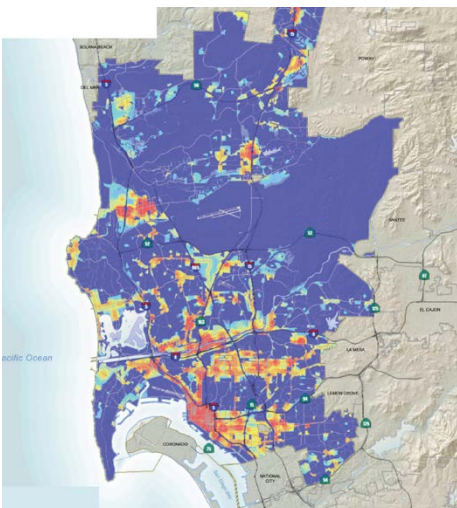
In its current state, the PEIR provides impermissible “conflicting signals” regarding the nature and boundaries of the upzoning to occur. The Project must clarify how development will be targeted in accordance with the propensity map to be compliant with CEQA. (See *Southwest Regional Council of Carpenters*, supra 76 Cal.App.5th at 1173–74.)

While the stated goals of the Blueprint General Plan Update to focus on transit-supportive development within the Climate Smart Village Areas are great, the PEIR provides little detail on what level of upzoning is to occur or where it is intended to occur. The PEIR claims that the focus is to facilitate housing in the Climate Smart Village Areas, which are clearly delineated areas with firmly established boundaries. However, the land use framework is actually “defined by the Village Climate Goal Propensity Map.” (Draft PEIR, p. S-3.) This map contains no clear delineations or categorizations of land; rather, it depicts a blurry gradient upon which to determine the general village propensity value. This map, and the blurred edges defining the boundaries of each value, results in an unclear depiction of the areas expected to see increases in development beyond the Climate Smart Village Areas. Moreover, the clear boundaries of the Climate Smart Village areas do not align with the blurred propensity values.

O11-7

In contrast, the original General Plan Village Climate Goal Propensity Map *did* contain clear boundaries to the edge of each propensity value. This change was intentional, as the PEIR states: “While the scores were calculated at the [Master-Geographic Reference Area (“MGRA”)] level, the optimization results were mapped in a heatmap format using the Inverse Weighted Distance function in ArcGIS to enhance the visualization.” (PEIR, Appendix J, p. 4.)

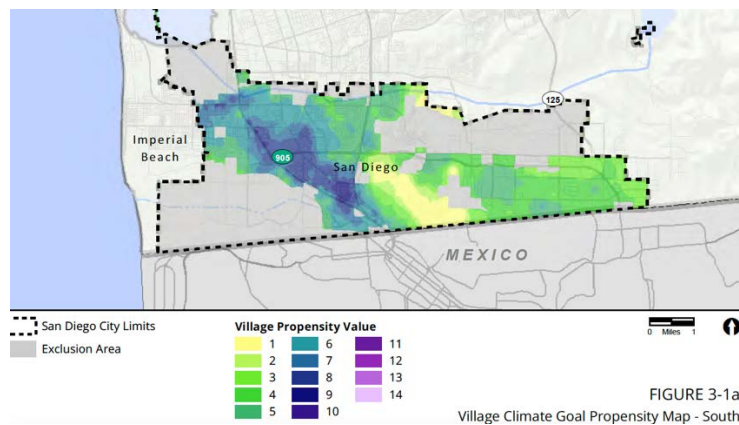
Below are images of the current Village Propensity Map (left) and the proposed new map (right):



This change resulted in an unclear depiction of the Project’s reach and boundaries, given that the Village Climate Goal Propensity Map would be incorporated into the General Plan. The PEIR admits that the Village Climate Goal Propensity Map misrepresents areas that should be excluded, including conservation lands, noting: “The heatmap generation process considers the exclusion areas meaning that the ranking score for the exclusion zones were considered as zero, but the blending of values often shades them as a low-level score.” (Appendix J, p. 4.)

At a minimum, the proposed Blueprint map should be reverted to the MGRA level map so that the scores for a given area are clearly depicted and portrayed in the same color scale so that the public and decisionmakers can understand the changes being proposed by the Project.

Further, there are variations of the proposed new “Village Propensity Map” throughout the PEIR and Project, creating further conflicting information. For example, see the following excerpt from the PEIR:



O11-7  
cont.

In comparison, see an excerpt of the same area from proposed new Figure LU-1, “Village Climate Goal Propensity,” in the Blueprint revisions to the Land Use Element (see also PEIR, Figure 3-5):





Additionally, the text of the PEIR also lends itself to confusion in interpreting the Project. There are various references to “citywide” upzoning, as well as upzoning outside of the Climate Smart Village Areas. (See, e.g., Draft PEIR, p. 3-8.) The PEIR also states, “The project would facilitate placement of non-residential and multifamily development in appropriate area of the City consistent with the Village Climate Goal Propensity Map and *primarily* within Climate Smart Village Areas, which are *primarily* areas in close proximity to existing and planned transit, pedestrian, and bicycle facilities.” (Draft PEIR, p. 4.10-65, emphasis added.) Elsewhere, the PEIR notes: “Although opportunities for new development would *likely* be focused in these Climate Smart Village Areas, future CPUs, specific plans, and focused plan amendments could also plan for development *outside* these Climate Smart Village Areas (i.e., areas with a village propensity value of 1 through 6) where considered appropriate for the surrounding area.” (PEIR, p. 3-8, emphasis added.)

O11-8

Further, the PEIR analysis indicates that areas with a propensity score of “Level 7 (blue) to 9 (dark purple) highlights areas with *medium* priority for development considering all the interacting factors,” and then “[a]t level 10 (dark purple) to level 14 (light purple), the areas with the highest receptiveness for future developments to maximize non-auto propensity are illustrated.” (PEIR, Appendix J, p. 4.) Yet, the PEIR then groups levels 7-14 for identifying Climate Smart Village Areas, despite the wide-ranging nature of these scores.

O11-9

Again, the purpose and boundaries of the Project’s density increases, and Climate Smart Village Areas, are obfuscated. The PEIR leaves it unclear the extent that upzoning is being proposed outside of the smart village areas. Upzoning areas beyond the Climate Smart Village Areas (i.e., the areas already evaluated as being beneficial if upzoned) would result in additional destructive sprawl and the obstruction of climate goals. The PEIR must provide more information about each “propensity level” and disclose how many increased units are proposed for each propensity level and the corresponding GHG impacts of each proposed increase—especially outside of the Climate Smart Village Areas.

O11-10

Further, Blueprint and the PEIR claim that the exact location of densities will be refined later during the Community Plan updates, but simultaneously state that in-depth future environmental review will not be conducted for these future actions and that the propensity map scores will be the minimum densities. (See PEIR p. p. 3-26, Blueprint Revisions LU-32 to LU-33, LU-40 [requiring future plans to be consistent with village propensity map], p. 3-14.)

O11-11

Therefore, the PEIR must provide a clearer Project description and disclose the extent of upzoning being proposed for each “village propensity score.”

O11-12

**B. The PEIR Inappropriately Claims to Analyze Future Undefined and Unspecified Actions**

Under CEQA, the Project must be studied at an appropriate level of detail. Yet, the PEIR claims that its scope includes unspecified, undefined, and unstudied future land use code changes, Community Plan Updates, and amendments. (PEIR, p. 3-26, 3-7.)

In particular, the PEIR indicates that future CPUs will not prepare EIRs:

The environmental analysis approach for prior CPUs has been to prepare a PEIR for each CPU. Through this process, the environmental analysis has found similar environmental impacts which require similar mitigation frameworks. Due to this, the City identified an opportunity to address the environmental analysis for future CPUs as part of the analysis for the Blueprint SD Initiative. Future plan amendments including CPUs, specific plans, and FPAs, as well as future projects consistent with those plans, and future amendments to the LDC consistent with the General Plan policy framework would be evaluated in the context of this PEIR.

O11-13

(PEIR, p. 3-25.)

The PEIR consistently avoids incorporating mitigation measures now on the grounds that its review is being done at the programmatic level. (See PEIR, p. 4.1-13, 4.2-28, 4.3-62.) Yet, the PEIR simultaneously claims it is “evaluating” future events that have not happened yet and will obviate the need for future EIRs. The City cannot have its cake and eat it too. Further, the City is still required to incorporate feasible mitigation at the programmatic level. (Cal. Code Regs. Tit. 14 § 15168, sub. (c)(3) [“An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program”].)

O11-14

The use of one programmatic, high level Citywide PEIR for all future CPUs is inappropriate and precludes meaningful mitigation. The use of this PEIR for the University Community Plan Update and Hillcrest Focused Plan Amendment underscores the problematic nature of this approach. There should be project specific mitigation measures for the proposed University CPU and Hillcrest FPA. The PEIR admits that there are many more details provided for these projects, yet did not include any specific mitigation for either of the projects, in violation of CEQA. (PEIR, p. 3-8, Table 9.1 Mitigation Monitoring and Reporting Program.)

O11-15

For example, the Biological Report for the University Community Plan update (PEIR, Appendix D) identified several mitigation and minimization measures in Section 7. Yet, these were not included as mitigation measures in the PEIR. (PEIR, p. 4.3-64.) This elucidates the problem with utilizing a Citywide PEIR for community specific plans. At a minimum, the PEIR must be re-

O11-16

circulated for public review and comment on proposed mitigation measures for the University CPU and Hillcrest FPA.

O11-16  
cont.

## **II. The PEIR Fails to Fully Analyze, Disclose, and Mitigate Impacts to Greenhouse Gas Emissions and Vehicle Miles Travelled**

Sierra Club supports infill and transit oriented development in the City of San Diego, as well as moving away from auto-dependent development. However, for development to be “transit-oriented” the “transit” needs to occur.

O11-17

### **A. The PEIR Must Analyze and Disclose the Likelihood of Transit Infrastructure, and Provide Mitigation and Safeguards to Ensure the Promised Transit Occurs**

The PEIR premises its analysis of Blueprint’s projected GHG and VMT entirely on the assumption that the 2050 regional transportation network from SANDAG’s 2021 Regional Transportation Plan, referred to throughout the PEIR as the “Regional Plan,” will be fully implemented. (p. 3-8, 3-2, 3-15 [“updated Village Climate Goal Propensity Map incorporates the 2050 regional transportation network”], App’x J, p. 4 [“using the SANDAG 2021 Regional Plan 2050 Vision transit network and stops”].) Yet, a major shortcoming in this analysis is the lack of any assured funding mechanisms in the PEIR or Blueprint, or provision of evidence that the PEIR’s assumption is reasonable and grounded in substantial evidence.

O11-18

The Regional Plan and its transit projects are subject to change every 4 years.<sup>1</sup> The SANDAG Regional Plan explains that it determines “which transit projects to advance in earlier phases, particularly by 2035, based on the availability of revenues.” (SANDAG 2021 Regional Plan, p. A-4.) Several transit projects relied on by the PEIR are not scheduled until the latest “2036 to 2050” phase, and/or lack earmarked, assured funding. This includes the light rail line through Bankers Hill, Hillcrest, North Park, South Park, and Golden Hill, and the Purple Line regional rail between Sorrento Mesa and the International Border.<sup>2</sup>

O11-19

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<sup>1</sup> For example, SANDAG subsequently circulated an amended 2021 Regional Plan in 2023, after it failed to approve the Regional Road Use Charge (“RUC”). (Amendment to the 2021 Regional Plan, pp. 3-4.) Removal of the regional RUC reduced anticipated revenues by \$14.2 billion. (Ibid.) *Separate* from the regional RUC, the 2021 Regional Plan also assumed revenues resulting from a state-administered RUC that is only in the pilot phase. The Regional Plan further relied on a proposed citizen initiative for a sales tax measure, which will be circulated in 2024 for voter consideration. (Ibid.)

<sup>2</sup> See 2021 Regional Plan, Appendix A, pp. A-79 through A-84, A-14, (available at: <https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2021-regional-plan/final-2021-regional-plan/2021-regional-plan-appendix-a-2021-12-01.pdf>), 2025 Conceptual Regional Plan, p. 8 (available at <https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2025-regional-plan/2025-rp-draft-initial-concept-2024-1-25.pdf>.)

Further, the Regional Plan assumes that 54% of its funding--\$89 billion dollars--will come from local sources, including impact fees and general funds. (Amendment to the 2021 Regional Plan,<sup>3</sup> Attachment A: Errata to the 2021 Regional Plan, P. 5<sup>4</sup>.) The City already faces an overall infrastructure funding deficit of \$4.81 billion, the “second largest in city history.”<sup>5</sup> Blueprint’s PEIR is exactly the place to require provision and dedication of impact fees and general funds to specified transit projects as mitigation. If the City wants to rely on the Regional Plan, the PEIR must require the local contributions that are identified in the Regional Plan and phase development in alignment with the Regional Plan transit phases.

O11-20

The Regional Plan further assumes that most anticipated revenues needed for its implementation will not be realized until sometime between 2036-2050. (*Id.* at p. 6.) Yet, the PEIR only analyzes VMT and GHG outcomes in 2050, ignoring the reality that as proposed, the Project will intensify development in areas that will not even see funding for transit projects for over ten to twenty years.

O11-21

In its comments on the Blueprint PEIR Notice of Preparation, the Mira Mesa Community Planning Group requested more detailed information about transit infrastructure:

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.

O11-22

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.

(PEIR, Appendix A, p. 60, emphasis added.)

<sup>3</sup> Available at: <https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2021-regional-plan/amendment-to-2021-regional-plan/amendment-2021-regional-plan.pdf>.

<sup>4</sup> Available at: <https://www.sandag.org/-/media/SANDAG/Documents/PDF/regional-plan/2021-regional-plan/amendment-to-2021-regional-plan/amendment-2021-regional-plan-errata.pdf>.

<sup>5</sup> <https://www.sandiegouniontribune.com/news/politics/story/2024-02-05/not-just-stormwater-san-diego-needs-more-than-6-billion-for-crucial-infrastructure-but-has-just-a-quarter-of-that>.

Yet, we were unable to locate any such analysis or discussion of funding in the PEIR, despite clear and repeated requests for it from several organizations and community planning groups. The PEIR must include mitigation measures that condition proposed development projects on assured funding, construction, and implementation of the promised transit projects as mitigation for Blueprint and any future tiered projects.

In fact, the PEIR admits that “at a programmatic level of analysis, it is not possible to ensure that full implementation of the Regional Plan’s transportation investments and the timing of these investments with the specific development would occur. Therefore, residential and employment VMT impacts would be considered significant.” (PEIR, p. 4.14-16 to 17.)

O11-22  
cont.

Likewise, the PEIR states, “Streetcar service will provide a 10-minute all day frequency service from Downtown San Diego to the Hillcrest neighborhood and is planned to connect to Logan Heights, Golden Hill, South Park, North Park, and University Heights, expected to be complete by 2050, *contingent upon future funding.*” (PEIR, 3-34, emphasis added.)

The PEIR further describes that the previous General Plan Village Propensity Map LU-1 was based on “existing or an identified funding source for transit service.” (PEIR, p. 4.10-34.) Blueprint removes this language from the Land Use Element (Blueprint Draft Land Use Element, p. LU-10), and we could not identify any similar language included in relation to the new LU-1 “Village Climate Goal Propensity Map.”

Blueprint seems to even weaken policies that require Community Plans to provide information on timing of transit and public facilities, via the following proposed changes:

LU-C.2. Prepare community plans to address aspects of development that are specific to the community, including: distribution and arrangement of land uses (both public and private); the local street and transit network; ~~location, prioritization, and the provision of existing and planned~~ public facilities;

O11-23

LU-F.2. Review public and private projects to ensure that they do not adversely affect the General Plan and community plans. Evaluate whether proposed projects implement specified land use, density/intensity, design guidelines, and other General Plan and community plan policies including open space preservation, community identity, mobility, and ~~the timing, phasing, and provision of~~ public facilities

The PEIR must be revised to describe how, when, and where the promised transit infrastructure will be implemented. The PEIR also must require enforceable commitments to ensure that the promised transit will occur, and safeguards in the event funding is not secured for promised

O11-24

transit improvements. Vague, unenforceable language cannot be relied upon to assure transit will be provided.

For example, the PEIR cites the following policy from the General Plan, which proposes only voluntary language on the question of funding transit in the University Area:

*Policy 3.5A: Coordinate with MTS and SANDAG to increase transit infrastructure and service enhancement opportunities within University, including those identified in the adopted Regional Plan and future updates of the Regional Plan.*

Blueprint further proposes only voluntary, vague, and unenforceable policies as it relates to provision of transit infrastructure and funding, for example:

*ME-D.15. Support a stable, multi-year transportation funding policy for passenger rail services that meets the goal of improved rail travel opportunities.*

See also policies MD-10 through MD-16. These policies must be revised to use mandatory language. Policies to “support,” “coordinate,” or “assess” are unenforceable. As another example, proposed policy ME-D.7 merely states, “Assess ways to improve the availability of transit and transit access for underserved and transit-dependent populations.” This should be revised to state “**Increase** availability of transit and transit access...”

## **B. The PEIR Must Include Feasible and Enforceable Mitigation**

The PEIR finds that VMT impacts of Blueprint will be significant, but only includes one vague, unenforceable mitigation measure that is subject to unspecified future changes:

*MM-TRANS-1 – Achieve VMT Reductions: Future development shall be required to demonstrate compliance with the City’s Mobility Choices Ordinance (SDMC Section 143.1103 et seq.) and the City’s TSM, including preparation of a VMT analysis, where applicable.*

The PEIR cannot simply provide a cursory conclusion that an impact is significant without any effort to mitigate the impact. Further, CEQA requires incorporation of all feasible mitigation measures that are “fully enforceable.” (Public Resources Code 21081.6(b)). As drafted, the single proposed Mitigation Measure does not comply with CEQA’s requirements. It must be revised to specify the required VMT reductions for proposed new development and to detail when VMT analysis will be required.

O11-24  
cont.

O11-25

In fact, Blueprint is even proposing to weaken the General Plan’s existing policy as it relates to Transportation Demand Management plans, removing the language to “require” all new development to achieve certain actions, and instead merely to “encourage” new development:

~~Require new~~ ME-G.6. Encourage large residential, mixed-use, and employment development to have site designs and on-site amenities that support alternative modes of transportation.

O11-26  
cont.

(Blueprint Proposed General Plan Revisions, p. ME-66.)

The PEIR must include enforceable timelines for transit infrastructure and tie the proposed development to the provision of transit, including through the requirement of Development Impact Fees or other funding mechanisms concurrently with development, via enforceable mitigation measures in the PEIR and mandatory policies in Blueprint.

### C. Additional Information Requested about the PEIR’s VMT Analysis

All VMT projections in the PEIR utilized a 2050 year scenario and did not include any interim projections. There should be interim projections included, especially to analyze consistency with SB 32 and CARB’s 2022 Scoping Program interim 2030 targets. Analysis is needed to evaluate how the Project impacts the State’s interim 2030 GHG targets.

O11-27

Additionally, projected population growth in the City of San Diego has dropped by 192,859 between the SANDAG Series 14 projections in 2021 and current draft of the Series 15 projections. Did the PEIR incorporate these new projections into its analysis? If not, why not?

O11-28

The PEIR’s VMT Analysis lists the variables that it utilized in its analysis to evaluate “non-auto propensity,” including “dwelling unit density, retail employment density, mixed-use density, the competitiveness of transit services for work commute travel, proximity to TPA high-quality transit stops, and household vehicle ownership,” noting that the “estimated coefficients for all the variables reflect an increasing relationship with the response variable except for vehicle ownership.” (PEIR, App’x J, p. 2.) What coefficients were assumed for each of these variables? In particular, did the modeling comply with CAPCOA’s guidance on modeling VMT reductions from increases to density?<sup>6</sup>

O11-29

Finally, why was 2016 selected as the baseline year for the VMT projections, rather than a more recent date?

O11-30

<sup>6</sup> CAPCOA Handbook available at [https://www.calemod.com/documents/handbook/full\\_handbook.pdf](https://www.calemod.com/documents/handbook/full_handbook.pdf).



#### **D. The PEIR Fails to Adequately Analyze, Disclose, and Mitigate Greenhouse Gas and VMT Impacts From Expanded Development Outside of VMT Efficient Areas**

The PEIR declines to include quantification of GHG emissions, stating that it is not required to conduct such an analysis. (PEIR, p. 4.7-15.) Yet, the Project proposes to upzone the entire City, beyond areas in Climate Smart Village Areas, resulting in increased emissions that were not included in the Climate Action Plan (“CAP”) inventory or mitigated in the CAP. Further, the City has since expanded the reach of its Complete Communities and Bonus ADU Program beyond Transit Priority Areas (“TPAs”). Therefore, the PEIR must analyze the implications of the Project, in conjunction with the expansion of these programs beyond TPAs, on the CAP’s inventory.

O11-31

The PEIR reasons that it will not create significant GHG impacts because it will locate housing in Smart Village Areas. (PEIR, p. 4.7-22.) Yet, this conflicts with the PEIR’s statements elsewhere about increasing housing outside of those areas, which *will* create significant GHG impacts. (See p. 4.7-17, 4.10-83.) In particular, the PEIR admits, “The Blueprint SD Initiative would support increases in development intensities citywide...” (p. 4.3-17, emphasis added.)

Relatedly, the PEIR provides the following as a Project objective: “Establish land uses that facilitate transit-oriented, multiple-use villages, districts, and developments within the City’s Sustainable Development Areas (SDAs).” (PEIR, pp. 3-6, 8-1.) Yet, the PEIR fails to provide substantial evidence to support its assumption that increased density Citywide, including in “Sustainable Development Areas,” areas up to one mile – and beyond ½ mile – from transit will reduce VMT, given that the State of California utilizes Transit Priority Areas, which are 1/2 miles from transit. (PRC § 21155.1.)

O11-32

Wholesale increases to development density across the City, in areas that are not close to existing or assured, forthcoming transit will only serve to increase VMT and GHG, and must be adequately analyzed and disclosed. In particular, the PEIR must identify areas outside of the Climate Smart Villages that are being upzoned in comparison to the current General Plan, and identify mitigation for that development.

Finally, the PEIR includes no mitigation measures related to GHG emissions. Yet, the prior General Plan Environmental Impact Report included mitigation measures for impacts to GHG emissions, including mitigation measures related to the preparation of the CAP. Wholesale removal of all GHG mitigation measures without any replacement measures is a step in the wrong direction. The PEIR must include implementation of the CAP and its individual measures as a mitigation measure. This is particularly important provided that the PEIR relies on the CAP to conclude that the Project will not result in significant GHG impacts (PEIR, p. 4.7-11.) Further, the CAP Consistency Checklist requires very little of individual projects. (PEIR, p. 4.7-12 [noting that Development ...shall provide only *one* of the following “amenities”: One trash

O11-33



receptacle and one recycling container; seating; lighting; wayfinding signs; *or* enhancement of bus stop or public transit waiting station”].) The City should require more than the provision of a trash can; the PEIR is the opportunity to do so.

The PEIR must include mitigation measures, including the measures promised in the CAP, as well as project-specific measures. For development proposed outside of Climate Smart Village Areas, the PEIR should specify required mitigation measures, including a requirement that Projects demonstrate net zero GHG emissions to ensure CAP consistency.

O11-33  
cont.

For example, the City of San Diego has begun to develop the Southwest Village Specific Plan, which proposes almost 6,000 homes on 472 acres of undeveloped in Otay Mesa, in an area that is not considered VMT efficient.<sup>7</sup> Mitigation should be required for projects like these.

### **III. The EIR Must Adequately Analyze, Disclose, and Mitigate Impacts to Biological Resources and Implementation of the City’s MSCP**

#### **A. The PEIR Must Incorporate Measures to Ensure Mitigation of Biological Impacts**

The PEIR’s sole mitigation measure for impacts to biological resources, MM-BIO-1, requires that future projects that could impact sensitive species or habitats comply with the City’s ESL Regulations, Biology Guidelines, and HCP Plans including the City’s MSCP Subarea Plan. (Draft PEIR, p. 9-3.) Merely complying with existing law should not in itself be a mitigation measure. The California Attorney General has warned against labeling compliance with existing regulations as a mitigation measure, asserting that “compliance with applicable regulations is required regardless of CEQA.” (Cal. Att’y Gen., Warehouse Projects: Best Practices and Mitigation Measures to Comply with the California Environmental Quality Act, at 7 (Updated Sep. 2022); *see also* Californians for Alternatives to Toxics v. Dept. of Food & Ag. (2005) 136 Cal.App.4th 1, 16–20.)

O11-34

Additionally, the PEIR states that future projects will follow the City’s ESL Regulations and Biology Guidelines and “will be required to determine the potential of occurrence of sensitive plant species in the area.” (Draft PEIR, pp. 4.3-53, 4.3-48.) The PEIR further states that development which would impact ESL would require a Site Development Permit and therefore discretionary review, but this would only be required in the event of a subsequent finding of impact to ESL. (*Id.* at 4.3-61.) Yet, the City updated its ESL regulations to remove the requirement for a Site Development Permit for projects deemed to be “infill.” (Table 143-01A, footnote 6 [only requiring a Neighborhood Development Permit.]) The PEIR must require, as a

O11-35

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<sup>7</sup> <http://southwestvillageplan.com/#features>, [https://www.sandiego.gov/sites/default/files/pc-22-054\\_otay\\_mesa\\_community\\_plan\\_and\\_general\\_plan\\_amendment.pdf](https://www.sandiego.gov/sites/default/files/pc-22-054_otay_mesa_community_plan_and_general_plan_amendment.pdf). The SANDAG SB 743 Maps report on the closest parcels a 101.1% percent of the regional VMT Per Capita by Traffic Analysis Zone in 2050.

binding mitigation measure, that project sites be surveyed for sensitive vegetation and MSCP compliance before project approval.

O11-35  
cont.

Further, the City has shifted towards trying to process more projects as ministerial. By categorically processing permit applications for these future projects as ministerial, the City will effectively preclude any opportunity for adequate or meaningful review of the applicability of ESL regulations to these projects. The result, as we have seen frequently in our experience, will be a lack of opportunity for project-specific mitigation.

O11-36

Where projects are located near or adjacent to the MHPA, or in other areas with biological resources, discretionary review must always be required; ministerial review will only impede the ability to mitigate harm to these sensitive areas.

O11-37

The PEIR explains that the development and potential impacts of the initiative are “most likely to be concentrated within the Climate Smart Village Areas,” yet relies on “generalized vegetation data” to estimate land cover in these areas. (Draft PEIR, p. 4.3-1.) The PEIR further notes that the presence of sensitive plant species on a given site is a highly site-specific calculation that must be based on future project-level surveys. (*Id.* at 4.3-23.) This requirement for site-specific surveys for sensitive vegetation must be included as a **clear, binding mitigation measure in the PEIR**. Absent the incorporation of this measure, given the broadened scope of projects that would be considered ministerial, the ESL Regulations will not be effectively implemented and will be based on conclusions drawn from highly generalized data.

O11-38

Finally, the PEIR only analyzes biological resources within the Climate Smart Village Areas, but the Project expressly states that it could also increase development beyond these discrete areas. (Draft PEIR, p. 4.1-16.) All areas of potential impact should be studied, including those beyond the Climate Smart Village Areas, if there is the potential for increased development. Alternatively, the GPU should clarify the scope of the project and limit it to the increased development in the Climate Smart Village Areas.

O11-39

## **B. The PEIR Fails to Study the Impacts of the Addition of New Trails**

The University Community Plan prematurely adds trails through ESL and the MHPA without adequate review. (Draft PEIR, Figure 3-26.) Numerous incompatible trails have been proposed in Rose Canyon. For example, two “Proposed New Trail[s] (location to be determined)” have been suggested near Marcy Neighborhood Park. This section of Rose Canyon contains wetlands and two Tier I vegetation communities: Diegan Coastal Sage Scrub and Valley and Foothill Grasslands. These habitats are “considered sensitive and declining habitats” and “impacts to these resources may be considered significant.” Though the precise location of these proposed trails has yet to be determined, these trails are shown in these locations on the map in the PEIR, and are guaranteed to interact with sensitive communities regardless of their exact location in

O11-40

Rose Canyon. Thus, they cannot be said to be located in the “least sensitive areas of the MHPA,” as required by the City’s MSCP. (MSCP Subarea Plan, p. 52.) Other proposals for new trails or trail modifications in Rose Canyon pose similar inconsistencies with the MSCP. For example, another trail through Nobel Hill goes directly through a Vernal Pool, as well as through Diegan Coastal Sage Scrub and Valley and Foothill Grassland. Impacts to these resources must be studied under both the California Environmental Quality Act and the City’s MSCP.

O11-40  
cont

Additionally, the language in the City’s MSCP Subarea Plan indicates that the City was preparing a Natural Resources Management Plan (“NRMP”) for the management of any “urban habitats [that] are part of a natural resource park.” (MSCP Subarea Plan, p. 74.) No NRMP was ever prepared for this area, nor is there any indication that one will be prepared in the near future. The MSCP states that Rose Canyon is an urban habitat within the MHPA (*id.* at 19), yet the area seems to be unmanaged under any NRMP or other similar plan. Proposing trails in this area without the guidance of an NRMP will preclude meaningful review of the sensitive vegetation known to occur in this canyon and across the entire study area under the University Community Plan.

O11-41

Thus, these trails must be removed until adequate site-specific environmental review is conducted and MSCP compliance is ensured.

### C. The PEIR Fails to Analyze, Disclose, and Mitigate the Project’s Conflicts with the City’s Multiple Species Conservation Program

As stated above, the proposed trail systems in the University Community Plan are noncompliant with the City’s MSCP Subarea Plan because they are not located in the “least sensitive areas of the MHPA” as required. (MSCP Subarea Plan, p. 52.)

The PEIR concludes that there will not be impacts affecting the MSCP because no specific development is proposed. (Draft PEIR, p. 4.3-60.) However, given the vagueness of the project and the inclusion of plans to minimize and streamline future review, the fact that no specific development is proposed does not support the conclusion that there will be no impacts to the MSCP’s implementation. By minimizing future review and ensuring most permits are processed ministerially, the Project precludes review of the core considerations of the MSCP, including sensitive vegetation, listed species, and comprehensive habitat acreage.

O11-42

In fact, the MHPA extends into the Climate Smart Village Areas, the Hillcrest FPA area, and the University CPU area in various locations. (*Id.* at 4.10-44, Figures 4.10-10a, 4.10-10b, 4.10-10c, & 4.10-10d.) The Project will directly interact with the MHPA lands in these locations. Accordingly, it cannot be said to have no impact on the MSCP’s implementation. Even if the Project does not propose development now, it will streamline development in these protected areas. The Project must **remove upzoning** in these MHPA areas, as proper environmental review

of the impacts of said upzoning has not yet been conducted. Particularly within these areas, compliance with the MSCP’s General Planning Policies and Designs must be required for each new development. These requirements include limiting roads to those essential for circulation or emergencies, ensuring construction areas or access roads do not disturb existing habitat, prohibiting the storage of materials (including toxics, chemicals, and equipment) within the MHPA, and requiring fencing where land uses adjacent to the MHPA are incompatible with conservation goals. (MSCP Subarea Plan, pp. 43–47.)

O11-42  
cont.

Additionally, the PEIR or Blueprint GPU lacks a funding mechanism for biological resources and MSCP implementation. The MSCP requires the City to secure funding and identify how funding will be secured. (MSCP Subarea Plan, p. 101.) This may include long term and short term funding strategies and certain funding obligations both locally and regionally, as modeled after the MSCP. (*Id.*)

O11-43

The PEIR admits that the Project will result in increased strain on the City’s existing open space systems. (PEIR, p. 4.13-7.) Yet, the PEIR simply concludes:

[A]t a program level of review, it cannot be determined to what extent future parks and recreational facilities would be able to accommodate increased demand and offset the potential increased use of existing parks and recreational facilities and their associated physical deterioration that could occur with implementation of the Blueprint SD Initiative. As future development is proposed, individual private developments would be required to either pay Citywide Park DIFs or provide public parks consistent with SDMC Section 142.0640(b)(9)(A-F), as detailed in Section 4.13.2.2c.

O11-44

This analysis and conclusion fail to address the increased impacts to the City’s resource-based parks from the Project.

The PEIR should include feasible mitigation measures to require and ensure funding for the MSCP and Vernal Pool Habitat Conservation Plan, especially since these plans are not currently being fully implemented by the City due to lack of funding. For example, the City is not meeting its requirement to control invasive non-native species on preserve land and routinely points to not having funding as the reason. Additionally, mountain bikers have built many unauthorized trails in Rose and San Clemente canyons, which are in proximity to the proposed new dense zoning and will face increased strain as a result, but the City lacks the resources to enforce or restore the trails. The City is not fulfilling its management requirements of MSCP lands, in part due to lack of resources. This problem will become exacerbated under the proposed densification of the City and increased strain on resource-based parks and preserve lands, given the absence of any binding mitigation measures. This is a significant impact that must be mitigated in the PEIR.

O11-45

#### IV. The PEIR Must Incorporate Feasible Mitigation to Address Significant Air Quality Impacts

The PEIR admits that the Project will result in significant air quality impacts due to increased emissions beyond SANDAG projections, yet does not disclose the severity of this impact. (PEIR, p. 4.2-14, 4.2-29)

Further, the PEIR only includes the following mitigation measure for air emissions:

MM-AQ-1 Air Emissions: Future projects shall comply with all applicable regulations pertaining to air quality including but not limited to SDAPCD Rule 20 through 20.8, Rule 50, Rule 51, Rule 52, Rule 55, and Rule 67.1. Construction and operation of individual development projects shall not exceed criteria pollutant significance thresholds detailed in the latest City’s CEQA Significance Thresholds.

As noted earlier, the Attorney General has explicitly stated that agencies should not rely on existing air quality regulations as mitigation measures.

MM-AQ-1 further continues: *“If an individual project is found to have the potential to exceed emission thresholds due to operational emissions, the following **are example measures** that could be implemented to reduce emissions to below a level of significance...”* (4.2-31.)

O11-46

- *demonstrate net zero energy expenditure,*
- *Implementation of transportation demand management measures.*
- *Prohibit the installation of woodstoves, hearths, and fireplaces in new construction facilitated by the proposed project.*
- *Expand and facilitate completion of planned networks of active transportation infrastructure.*
- *Implement electric vehicle charging infrastructure beyond requirements set forth in the 2022 California Green Building Standards Code mandatory measures, such as Tier 2 voluntary measures set forth in the 2022 California Green Building Standards Code (or future more stringent) standards.*
- *Implement traffic demand measures, such as unbundling parking fees from rent/lease options, encouraging/developing a ride -share program for the community, and provide car/bike sharing services, that will reduce daily individual car usage and reduce project VMT*

These examples, along with the “examples” provided for construction emissions, must be included as **required** mitigation measures for future development. To list them as “examples” is

inadequate and unenforceable. The PEIR provides no information on why it is not feasible to include the listed “examples” as binding mitigation measures for all proposed development.

O11-46  
cont.

## V. Conclusion

The Sierra Club is supportive of the general policies being proposed, *if* the PEIR is revised to ensure the promised transit will occur alongside the proposed development and the appropriate mitigation is incorporated.

O11-47

Thank you for your consideration of these comments.

Sincerely,



Kathryn Pettit  
Josh Chatten-Brown  
Isabella Coye

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**O11: Responses to the Sierra Club Comment Letter**

**O11-1:** The comment is an introduction to the attached comment letter. Comment noted.

**O11-2:** Comment noted. This comment does not raise an issue with the adequacy of the environmental analysis in the Draft Program Environmental Impact Report (PEIR).

**O11-3:** The San Diego Association of Governments (SANDAG) is responsible for planning the regional transportation network, including regional roads, regional highways, regional bicycle networks, and regional transit. As described in Section 3.2.1.1 of the Draft PEIR, SANDAG adopted a Regional Transportation Plan in 2021. It includes an updated regional transportation network that the City uses for planning purposes, to encourage the development of homes near transit, and to provide more mobility options and investment in active transportation infrastructure. As part of the Blueprint SD Initiative, the City updated the Mobility Element of its General Plan to reflect the 2021 SANDAG Regional Plan and includes an updated policy framework that encourages complete streets planning principles and concepts that will result in dynamic, vibrant corridors that support all modes of travel. As updates to SANDAG's Regional Plan and the regional transportation network occur, the village propensity values identified in the Village Climate Goal Propensity Map could be adjusted depending on an area's village characteristics and proximity to transit and could result in new Climate Smart Village Areas where opportunities for new development and active transportation investments would likely be focused. Figure 3-4 of the Draft PEIR shows the existing and proposed regional transportation network.

**O11-4:** The Blueprint SD Initiative proposes an updated policy and land use framework that would apply to all development Citywide and is intended to guide future land use plan updates (e.g., Community Plan Updates [CPUs], Specific Plans, and Focused Plan Amendments [FPAs]) and future San Diego Municipal Code (SDMC) amendments which would help facilitate the implementation of the Blueprint SD Initiative. Future development and associated impacts that follow this framework could occur Citywide including in areas outside of the Climate Smart Village Areas. It is anticipated that future CPUs, Specific Plans, and FPAs that are prepared consistent with the Blueprint SD Initiative would concentrate future land use changes that support higher density development within the Climate Smart Village Areas. As described in Section 3.5.1.2 of the Draft PEIR, opportunities for future homes and jobs are anticipated less in areas with a lower village propensity value (i.e., areas with a village propensity value of 1 through 6). Nevertheless, future CPUs, Specific Plans, and FPAs could still plan for additional density in areas with a lower village propensity when higher densities and intensities are considered appropriate for the surrounding area. Additionally, as updates to SANDAG's Regional Plan and the regional transportation network occur, the village propensity values identified in the Village Climate Goal Propensity Map could be adjusted depending on an area's village characteristics and proximity to transit and could result in new Climate Smart Village Areas where opportunities for new development would be focused. The Blueprint SD Initiative identifies the best locations for growth and the most receptive locations that support biking, walking, and transit usage based on the Regional Travel Demand Model, to achieve the City's Climate Action Plan's (CAP's) goals. The City can meet the CAP Strategy 3 goals that support mode shift through the Blueprint SD Initiative's land use strategy and through mobility investments and programs that address travel behavior. The Blueprint SD Initiative's land use strategy is the maximum extent feasible land use scenario that – when combined with other mobility

implementation strategies, which are part of the overall General Plan Refresh - can achieve the mode shift goals of the CAP. Refer also to Appendix N of the PEIR for additional information supporting how the Blueprint SD Initiative supports City mode share targets consistent with the CAP.

The Draft PEIR disclosed that the Blueprint SD Initiative's policy and land use framework would apply Citywide and potential impacts associated with the implementation of the Blueprint SD Initiative were analyzed throughout the PEIR. The Draft PEIR includes a mitigation framework which would apply to future discretionary actions within the project area and the City has a robust regulatory framework which would apply to all development throughout the City and would further minimize potential environmental impacts.

The Blueprint SD Initiative does not propose actual development, nor does it identify site-specific land use designations and zoning. Site-specific land use designations, zoning, policies, and recommendation would be brought forward during future land use plan updates. Future development projects would be required to undergo project-specific environmental review, as applicable, at the time they are proposed at which time potential environmental impacts, and the project's location regarding the Climate Smart Village Area, would be identified and addressed.

**O11-5:** The Draft PEIR includes mitigation measures that would help reduce the environmental impacts of future individual projects. As for the topics mentioned in the comment, air quality and biological resources would have significant impacts, for which mitigation measures have been provided. See MM-AQ-1, MM-AQ-2, and MM-AQ-3 in Section 4.2.6.4 of the Draft PEIR and MM-BIO-1 in Section 4.3.6 of the Draft PEIR. Additionally, the Blueprint SD Initiative, University CPU and Hillcrest FPA each include policies designed to minimize environmental impacts.

**O11-6:** The project description in Section 3.5 of the Draft PEIR clearly defines the scope of the project, which includes the Blueprint SD Initiative, Hillcrest FPA, and University CPU, and contains all elements required pursuant to CEQA. Additionally, future actions anticipated to implement each of the planning initiatives are summarized in Table 3-6 of the Draft PEIR. As a programmatic document, the project description does not provide project-level specifics but does provide feasible development buildout.

The Blueprint SD Initiative, Hillcrest FPA, and University CPU are all planning-level documents intended to implement the City's General Plan, Climate Action Plan (CAP), and Housing Element, among other City planning initiatives, policies, and programs. Furthermore, the respective project components are related because the Blueprint SD Initiative sets forth the policy and land use framework for community plans and the University CPU and the Hillcrest FPA were developed to be consistent with the land use and policy framework outlined in the Blueprint SD Initiative. For these reasons, the actions were appropriately evaluated within one PEIR. As explained in Section 3.5.1.3 of the Draft PEIR, the environmental analysis conducted for these projects found similar environmental impacts that required similar mitigation frameworks. To be more encompassing, the City identified an opportunity to address the potential environmental impacts of the University CPU and Hillcrest FPA congruently with those of the Blueprint SD Initiative since these plans were all developed consistent with the proposed General Plan refresh (Blueprint SD Initiative). To facilitate readability of the document, the analysis and existing conditions of the Blueprint SD Initiative, University CPU, and Hillcrest FPA can be found under the respective heading as appropriate.



**O11-7:** As described in Section 3.5.1.2, the Climate Smart Village Areas, which are areas with high village propensity values (values 7 through 14) as defined by the Village Climate Goal Propensity Map, would be the areas where future increases in development densities and intensities would be concentrated. The village propensity values are shown on Figures 3-1a through 3-1e of the Draft PEIR.

The Village Climate Goal Propensity Map is a land use framework intended to guide future land use plan updates (e.g. Community Plan Updates (CPUs), Focused Plan Amendments (FPAs), Specific Plans, etc.); the commenter is correct that the map does not identify specific rezoning to occur on specific parcels because the proposed action does not include such actions. The Village Climate Goal Propensity Map does not propose actual development. It is not a land use map that identifies site-specific land use designations and zoning. Instead, it is meant to indicate the areas of the City where future land use updates would focus on increasing development capacity through site-specific land use and zoning that allows for higher density and intensity development projects that would help bring the City closer to reaching its CAP goals for reducing greenhouse gas (GHG) emissions, as discussed further in Section 3.5.1.3. The Blueprint SD Initiative does not identify specific land use or zoning; rather, it is anticipated that future community plans and other applicable land use plans and policies would refine the General Plan's Citywide policies and provide site-specific land use designations, zoning, policies, and recommendations.

As noted by the commenter, the Village Climate Goal Propensity Map figures (Figures 3-1a through 3-1e) in the Draft PEIR have a legend that individually numbers the propensity levels from 1 through 14 in order to provide sufficient enough detail for the environmental analysis described throughout the Draft PEIR; and includes the Exclusion Areas, such as conserved lands, where future development would not be proposed. The Draft Blueprint SD Initiative has a legend that indicates the various propensity levels with a sliding scale in order to match the legend of the previously utilized Village Propensity Map of the General Plan.

**O11-8:** See response to comment O11-4. A future CPU, Specific Plan, or amendment to a plan may propose development outside a Climate Smart Village Area when it makes sense in the context of the plan. For example, the University CPU proposes development outside a Climate Smart Village Area in the community-oriented shopping centers along Governor Drive because these areas are the primary centers of activity for the surrounding neighborhoods; commercial and civic uses are already present in these areas – proposed residential uses would be well integrated into these existing activity centers, and new residents will have the opportunity to take a walk, ride a bike, ride transit or take a shorter drive to meet their daily needs and to get to nearby subregional employment areas. Additionally, the Blueprint SD policies largely call for future land use plan updates to focus on increasing development capacity within the Climate Smart Village Areas as they are in or near transit priority areas (TPAs), and the proposed higher density development is considered appropriate because it would bring the City closer to meeting its CAP and General Plan goals for reducing GHG emissions and increasing mode share. Future CPUs, SPs, or plan amendments are anticipated to be developed consistent with the land use and policy frameworks in the City's General Plan and CAP and would be reviewed for consistency with the Final PEIR and Mitigation Monitoring and Reporting Program. Also, see response to comment O11-11. As described in Section 3.5.1.2 of the Draft PEIR, future CPUs, Specific Plans, and FPAs could still plan for additional density in areas with a lower village propensity when higher densities and intensities are

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considered appropriate for the surrounding area so long as the proposed land uses result in VMT levels that are below the City's CEQA Significance Determination Thresholds to implement Climate Action Plan Strategy 3. Where land use changes are proposed as part of community plan updates or amendments where the communitywide VMT exceeds the thresholds, the plan update or amendment should ensure that the VMT thresholds are not exceeded for the focused area of the land use changes. Policy LU-A.2 has been added to the Blueprint SD Initiative, along with Mitigation Measure MM-TRANS-2 to further ensure that future land use plans will be consistent with the Blueprint SD Initiative framework.

**O11-9:** Varying densities of development would be appropriate for the range of village propensity values. While all areas with village propensity values between 7 and 14 are considered to be Climate Smart Village Areas, the highest density development projects would be proposed in the areas with the highest values (values 10 and above). Areas with values between 7 and 9 would still be appropriate for higher density development that would give residents the opportunity to take alternative modes of transportation and reduce their single occupancy vehicle usage with relatively less overall VMT than lower propensity areas. As stated in response to comment O11-7, the Village Climate Goal Propensity Map does not propose actual development. It is not a land use map that identifies site-specific land use designations and zoning. Instead, it is meant to indicate the areas of the City where future land use updates would focus on increasing development capacity through site-specific land use and zoning that allows for where higher density and intensity development projects would help bring the City closer to reaching its CAP goals for reducing GHG emissions.

An overarching goal of the Blueprint SD Initiative is to further implementation of the City's CAP and support a mode shift from single occupancy vehicles to alternative mobility options such as walking/rolling, biking, and transit to reduce GHG emissions. The Blueprint SD Initiative identifies the best locations for growth and the most receptive locations that support biking, walking/rolling, and transit usage based on the Regional Travel Demand Model, to attain the CAP's mode share goals. The Blueprint SD Initiative's land use strategy is the maximum extent feasible land use scenario that – when combined with other mobility implementation strategies, which are part of the overall General Plan Refresh - can achieve the mode shift goals of the CAP. Refer Appendix N of the PEIR for additional information supporting how the Blueprint SD Initiative supports City mode share targets consistent with the CAP. See also response to comment O11-8.

**O11-10:** The Climate Smart Village Areas are depicted on Figures 3-1a through 3-1e of the PEIR. See response to comments O11-4, O11-7, O11-8, and O11-9.

**O11-11:** As described in Section 3.5.1.3 of the Draft PEIR, future CPUs, Specifics Plans, and/or FPAs would be evaluated for consistency with the General Plan policy framework including the Village Climate Goal Propensity Map and the environmental analysis for future CPUs, Specific Plans, and/or FPAs could tier off of this PEIR. Future projects that are consistent with future CPUs, Specific Plans, and/or FPAs that are consistent with the Blueprint SD Initiative and associated PEIR could tier off of the PEIR if the proposed project is consistent with the development density of the established zoning, General Plan policies, or community plan policies. Depending on the scope of future projects, future environmental review for consistent projects might include tiered Mitigated Negative Declarations (MNDs), tiered EIRs, or other tiered environmental analysis in accordance with CEQA Guidelines Sections 15152, 15153, 15162, 15163, 15164, 15168, and/or 15183. This

condition does not preclude the environmental analysis of future projects from happening. See response to comment O11-8.

**O11-12:** This comment is noted. See response to comments O11-4, O11-6, O11-7, O11-8, and O11-9.

**O11-13:** See response to comments O11-4, O11-7, O11-8, and O11-11.

**O11-14:** Mitigation measures have been provided to the extent feasible to ensure future projects are consistent with the findings of this Draft PEIR. In instances where future development projects would have unforeseeable impacts, the PEIR identifies that potential for significant impact and provides mitigation measures and/or the established City ordinances and land use regulations that must be followed by future development projects to reduce impacts. See Table 9.1 (Mitigation Monitoring and Reporting Program). See response to comment O11-8.

**O11-15:** See response to comment O11-6 and O11-8. The proposed mitigation measures in the Draft PEIR respond to the impacts associated with the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA and applies to all as they are all part of the proposed project. For example, future development that has the potential to impact cultural resources located in the project area would be required to implement MM-HIST-2 to mitigate the impact. Mitigation measures shall be implemented under each individual planning-level document. Also, see response to comment O11-14.

**O11-16:** The mitigation measures provided in the Biological Resources Report for the University CPU (Appendix D of the Draft PEIR) are aligned with the City's Biology Guidelines, which are incorporated into the City's Land Development Manual (LDM) and required of all development projects that might impact environmentally sensitive lands (ESL). Mitigation measure MM-BIO-1 reinforces this compliance.

#### ***MM-BIO-1 – Impacts to Sensitive Biological Resources***

Future projects that could directly and/or indirectly impact sensitive species, sensitive habitats and/or wetlands shall comply with the City's Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans including, but not limited to, the City's Multiple Species Conservation Program (MSCP) Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP) and shall implement avoidance, minimization, and mitigation measures in accordance with the City's ESL Regulations, Biology Guidelines, and MSCP Subarea Plan and VPHCP.

The avoidance, minimization, and mitigation measures provided in Section 7 of the Biological Technical Report are identified in the City's Biology Guidelines and specific measures would be implemented on a project-by-project basis as future projects are proposed and site-specific impacts are identified.

**O11-17:** Comment noted.

**O11-18:** The Regional Plan provides the most up-to-date information regarding the development of the regional transportation system. It is the best available planning tool the City has to use when

developing land use plans that coordinate future increases in development capacity with planned transportation investments to meet the City's CAP goals. SANDAG is the region's transportation authority and is responsible for developing the regional transportation network but does not have land use authority. The City and the 18 local jurisdictions have land use decision making authority.

The Blueprint SD Initiative provides a land use and policy framework that would guide the future development of CPUs, Specific Plans, and FPA, as well as future SDMC amendments which implement the vision in the Blueprint SD Initiative. The Blueprint SD Initiative's land use strategy is the maximum extent feasible land use scenario that – when combined with other mobility implementation strategies, which are part of the overall General Plan Refresh - can achieve the mode shift goals of the CAP. Refer Appendix N of the PEIR for additional information supporting how the Blueprint SD Initiative supports City mode share targets consistent with the CAP.

The Blueprint SD Initiative does not propose actual development, and as discussed in Section 3.5.1.2 of the Draft PEIR, the village propensity values and associated Climate Smart Village Areas could be adjusted in the future as the regional transportation network changes. The Draft PEIR fully discloses that because full implementation of the Regional Plan's transportation investments might not occur, VMT impacts with the exception of retail VMT for the Hillcrest FPA would be significant (see Section 4.14.5.2 of the Draft PEIR for an analysis of VMT impacts). The purpose of CEQA documentation is to disclose the environmental impacts of proposed projects with the information available and to provide feasible mitigation measures to avoid impacts. As future buildout occurs, projects would be reviewed for consistency with the analysis in this PEIR, and additional environmental would occur as required. It is important to note that all development projects are reviewed for consistency with all regulations set forth in the City's Land Development Code and the Building Code. See response to comment O11-11 regarding future environmental analysis and response to comment O11-20 regarding funding for transportation improvements. See also response to comment O11-8.

**O11-19:** Comment noted. See response to comments O11-8, O11-18 and O11-20.

**O11-20:** Per CEQA Guidelines Section 15126.4, mitigation measures should minimize significant adverse impacts of a proposed project, and they should be "roughly proportional" to the impacts of the project (see CEQA Guidelines Section 15126.4(a)(4)(B)). In the case of the proposed project's VMT impacts, the significant impact is the increase in residential, employee, and retail VMT. The proposed mitigation measure MM-TRANS-1 would require future development projects to "demonstrate compliance with the City's Mobility Choices Ordinance (SDMC Section 143.1103 et seq.) and the City's TSM, including preparation of a VMT analysis, where applicable." In addition, future land use plans would be required to meet the City's VMT CEQA Significance Threshold (see response to comment O11-8).

Future development projects would already be paying into SANDAG's funding source for regional transit projects (per Attachment A, Errata, to the Amendment of 2021 Regional Plan). Coordinating the provision and dedication of impacts fees for SANDAG's regional planning projects is outside the scope of the proposed project and outside the scope of the City's mitigation authority. This type of requirement, which would need to be applied to all development projects regardless of whether they are within the City's jurisdiction or not, would not have a directly proportional connection with the VMT impacts of the proposed project.

**O11-21:** See response to comment O11-18. Project-specific details such as the timing, type, and location of future development projects in accordance with the proposed Blueprint SD Initiative, University CPU, and Hillcrest FPA are not known at this time. The Draft PEIR disclosed that because full implementation of the Regional Plan's transportation investments might not occur, VMT impacts with the exception of retail VMT for the Hillcrest FPA would be significant (see Section 4.14.5.2 of the Draft PEIR). Future development would be required to comply with the City's Mobility Choices Ordinance, which would help reduce potential VMT impacts. Additionally, all future discretionary projects would be required to complete a VMT analysis, as applicable, in accordance with MM-TRANS-1. In addition, future land use plans would be required to meet the City's VMT CEQA Significance Threshold (see response to comment O11-8).

**O11-22:** Regarding the need for and transit infrastructure, see response to comment O16-14 under comment letter O16. Please see response to comment O15-14 under comment letter O15.

The proposed Blueprint SD Initiative, University CPU, and Hillcrest FPA are long-range planning documents that are designed to guide future development projects. The analysis in the Draft PEIR addresses the fact that additional public services facilities and infrastructure could be required to serve projected buildout of the project. To assume the amount and source of funding needed to construct these public facilities and services, as well as regional transit projects, would be speculative and outside the scope of the project. As described in the Draft PEIR, actual needs and potential locations would be determined in the future land use plans and as development occurs.

**O11-23:** This comment is on the Blueprint SD Initiative itself and is not about the adequacy of the Draft PEIR. Comment noted.

**O11-24:** See response to comment O11-18. As stated in the response, SANDAG is the region's transportation authority and is responsible for developing the regional transportation network. The purpose of the Blueprint SD Initiative is to provide the policy and land use framework that will guide future land use updates and SDMC amendments that coordinate future increases in development capacity with planned transportation investments to meet the City's CAP goals. Also, see response to comment O11-20 regarding funding for transportation improvements.

**O11-25:** The City's Mobility Choices Regulations (SDMC Section 143.1103 et seq.) were adopted for the purpose of reducing Citywide VMT to address the environmental impacts of development related to noise, air pollution, and GHG emissions, and to promote public health and enjoyment by investing active transportation infrastructure and amenities that will result in the greatest reduction to Citywide VMT. All development within the City, with the exception of certain types of development as outlined in the regulations, is required to comply with the City's Mobility Choices Regulations which provide a standardized process for addressing potential VMT impacts across the City and provide specific measures to be implemented on a project-by-project basis depending on the project's characteristics. At a program-level of analysis without project-specific details, providing these specific requirements would be speculative. In addition, future land use plans would be required to meet the City's VMT CEQA Significance Threshold (see response to comment O11-8).

**O11-26:** The comment on the Blueprint SD Initiative policy does not concern the adequacy of the Draft PEIR. Regarding the timing and funding of future transit infrastructure, see response to comments O11-20 and O11-24.

**O11-27:** GHG impacts related to the 2022 CARB Scoping Plan are discussed in Section 4.7.4, Issue 2 (a), of the Draft PEIR. As discussed in this section, the proposed project would have a less than significant impact in relation to the 2022 CARB Scoping Plan because future development implemented under the project would require compliance with the State Building Code's energy efficiency and applicable green building standards. Additionally, future development would be reviewed at project intake to ensure the inclusion of all applicable energy efficiency and applicable green building requirements of the applicable building and energy codes. Compliance with applicable building code requirements would ensure that future projects implemented under the Blueprint SD Initiative, University CPU, and Hillcrest FPA are consistent with state plans including the 2008, 2017, and 2022 Scoping Plans.

**O11-28:** Series 14 represents the most up-to-date data that was available during the development of the Blueprint SD Initiative. The Series 15 Forecast is still in a draft state and is not an appropriate tool to use. Furthermore, the Regional Forecast relies on the land use plans prepared by the local cities when making growth assumptions. The Regional Forecast does not anticipate more housing construction beyond the total amount of homes that can be built under the currently adopted community plan and is used for mobility modeling purposes. Many other factors, including the City's current housing needs and climate goals, also informed the development of the Blueprint SD Initiative. It is important to note two things. First, SANDAG growth projections relate to population growth, which focuses on births, deaths, and net migration and does not address housing needs. Second, the proposed increase in development capacity does not directly equate to the number of new homes that will actually be constructed during the life of the General Plan and community plans as future housing construction is dependent on additional factors beyond the General Plan and community plans, such as overall economic conditions, private property owner decisions, market demand, interest rates, labor and materials supply, and availability of financing. Therefore, in order to plan for the City's housing needs, maximizing residential capacity is critical.

**O11-29:** This comment concerns and requests information regarding the VMT analysis for Blueprint SD Initiative, University CPU, and Hillcrest FPA. The VMT Analysis was conducted using the most current regional transportation model, SANDAG's ABM 2+, and is consistent with the recommendations made by the Office of Planning and Research (OPR) SB 743 Technical Advisory (December 2018). The VMT metrics used in the analysis are outputs of the ABM 2+ that are further described by SANDAG's SB 743 metadata (<https://sandag.maps.arcgis.com/sharing/rest/content/items/f85d3ffea0394f298af2462c9fbfe724/data>).

The commenter is referencing text from Appendix A: Blueprint Methodology of EIR Appendix J: VMT Analysis that details the development of the Climate Smart Village Areas heat map. The “non-auto propensity” equation attempts to describe the likelihood of choosing alternative modes of transportation versus a single-occupancy vehicle. Significant variables of the “non-auto propensity” were identified to influence mode choice in the SANDAG ABM and were developed as described in the memo. The coefficients are shown below (where dep = dependent variable; ind = independent variable; Ols\_b = ordinary least squares coefficient):

dep	ind	ols_b	ols_p	ols_r2
prop_non_auto	intercept	0.2463	0.0	0.736
	dwl_unit_dens	0.0048	0.0	
	mixed_density_retail	0.0001	0.0	
	avg_vehicles_per_hh_log	-0.1889	0.0	
	transit_comp_ratio	0.1483	0.0	
	Weighted_TPAtransit	0.0011	0.0006	

Appendix B: Blueprint SD Activity Based Model Inputs Development Memos of EIR Appendix J, detail how those Climate Smart Village Areas were converted into model run inputs for ABM 2+. As stated above the VMT metrics used for the VMT analysis were model outputs using SANDAG’s SB 743 methodology. No additional VMT reductions such as those described in CAPCOA’s guidance were applied to the model outputs. ABM 2+ is an activity-based model that synthesizes a population and simulates their daily travel behavior and is comprised of several sub-models. The ABM 2+ inherently takes into account land use densities (residential and employment), locational contexts such as access to transit, distances to attractors and other factors when simulating people daily transportation choices. For additional information on the ABM 2+ please visit: <https://www.sandag.org/data-and-research/transportation-modeling>.

Comment noted. See also response to comment O11-8

**O11-30:** The VMT analysis was completed using the latest publicly available regional transportation model from SANDAG, the ABM 2+ (Version 14.3.0), this is the same model used for the SANDAG 2021 Regional Plan Amendment completed in 2023. The current Regional Transportation Model uses a 2016 Base Year that is calibrated and validated to existing conditions in 2016 which include vehicle counts and travel behavior surveys and thus provides the most accurate VMT baseline. See response to comment O13-2 under comment letter O13.

**O11-31:** As described in Section 4.7.3.1 of the Draft PEIR, the City uses a consistency analysis in lieu of quantifying GHG emissions to determine significant impacts consistent with CEQA Guidelines Section 15183.5. The City Planning Department prepared a memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects, dated June 17, 2022, to provide guidance on significance determinations as it relates to consistency with the strategies in the CAP. The City’s guidance document requires environmental documents to address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP.

See response to comments O11-4 and O11-8.

**O11-32:** The Blueprint SD Initiative proposes an updated policy and land use framework that would apply to all development Citywide and is intended to guide future land use plan updates and SDMC amendments that would help facilitate the implementation of the vision in the Blueprint SD Initiative. See responses to comment O11-4 and O11-8,

The University CPU and Hillcrest FPA provide more specific details regarding proposed land uses and zoning throughout their respective CPU and FPA areas (including proposed development within and outside of the Climate Smart Village Areas) and the potential impacts associated with buildout of these plans is analyzed throughout the PEIR. In Section 4.7.4 of the Draft PEIR, the GHG analysis found that impacts associated with the project are projected to be less than significant because the project would be in alignment with the City's CAP.

**O11-33:** Since the threshold for analyzing potential GHG impacts is consistency with the City's CAP per the City's 2022 memorandum mentioned in response to comment O11-31, and the proposed project was found not to conflict with the CAP, mitigation measures that further require consistency with the CAP are not necessary. GHG impacts were determined to be less than significant, and in accordance to CEQA Guidelines 15126.4(a)(3), mitigation is not required for "effects not found to be significant." See also response to comment O11-8.

The Southwest Village Specific Plan is not a part of this project.

**O11-34:** At the program level, the proposed biological resources mitigation measure (MM-BIO-1) would help the City reinforce compliance with their Environmentally Sensitive Lands (ESL Regulations and Biology Guidelines at a project level. CEQA Guidelines section 15126.4(a)(1)(B) allows compliance with the Biology Guidelines to be identified as mitigation if compliance results in implementation of measures that would be reasonably expected to reduce the significant impact. The City's regulations provide a standardized process for addressing development impacts across the City and they lay out a process for which impacts can be addressed at a more project-specific level. Because all development projects are subject the City's Land Development Code regulations (e.g., its ESL Regulations), many of which are put in place for the specific purpose of mitigating or reducing environmental impacts through specific performance standards, these regulations are referenced as required mitigation measures. The biological resource impact after the implementation of the mitigation measure would remain significant. This conservative approach discloses that at this point in time, the location and type of development is unknown, and there is a potential for impacts to occur.

**O11-35:** As noted by the commenter, future projects would be required to comply with the City's ESL Regulations and Biology Guidelines. As described on Table 143-01A of the ESL Regulations, affordable housing, in-fill, and/or a sustainable building projects as described in SDMC Section 143.0915 may be permitted with a Neighborhood Development Permit (NDP) instead of a Site Development Permit (SDP). However, per SDMC Section 143.0920(b) (Affordable Housing, In-Fill Projects, and Sustainable Buildings Development Regulations), Neighborhood Development Permits cannot be issued for development projects within ESL, including development that might impact steep hillsides, unless supplemental findings pursuant to SDMC Section 126.0404(a) are prepared. It



is also worth noting that both the NDP and SDP are discretionary actions subject to CEQA and public review.

Regarding compliance with MSCP, see response to comment A3-5 under comment letter A3.

**O11-36:** This comment does not raise an issue related to the adequacy of the Draft PEIR; comment noted. Furthermore, the City's ESL Regulations apply to both ministerial and discretionary development Citywide.

**O11-37:** See response to comment A3-5 under comment letter A3.

**O11-38:** The proposed mitigation measure MM-BIO-1 would reinforce the implementation of the Biology Guidelines for all ESL. As required by Section III(A)(1) of the Biology Guidelines, a biological survey report is required for all proposed development projects that are subject to ESL and/or for which the CEQA review has determined that there might be a significant impact on other biological resources considered sensitive under CEQA. As future site-specific projects are proposed that may impact ESL and sensitive species, future site-specific surveys will be required at the project level during the project review process.

**O11-39:** See response to comments O11-4, O11-8, and O11-11.

**O11-40:** The proposed trails have been removed from the University CPU, the project description in Section 3.5.3(e) of the Draft PEIR, from Figure 3-26 of the Draft PEIR, and from the impact analysis in Section 4.3.4, Issue 4, of the Draft PEIR.

**O11-41:** Comment noted. The City's General Plan Conservation Element includes new Policy CE-B.1(h), which states the following:

Prepare and update Natural Resource Management Plans (NRMPs) on all managed preserved lands and include in plans considering shifting habitat or conditions due to climate change as well as sequestration potential, as the information becomes available.

In 2023, the City initiated a geospatial analysis to provide a framework for future NRMP planning and prioritization, with the intent to provide a data and equity-driven roadmap for determining NRMP boundaries and prioritizing future NRMP preparation. Proposed NRMP boundaries were delineated based on several factors, including watershed, habitat connectivity, habitat type and MHPA designation. The preliminary prioritization is based on a geospatial analysis that included several metrics relevant to the MSCP and equity: connectivity-core size, connectivity-linkage length, species diversity of rare plants, species diversity of rare animals, socio-economic status/climate vulnerability and percent city-owned land. A full report (the NRMP Strategic Roadmap) detailing the methods, results and recommendations resulting from this analysis is currently in preparation and is expected to be included as an attachment in the 2024 MSCP Report.

Regarding the proposed trails, see response to comment O11-40.

**O11-42:** See response to comment O11-40 regarding the proposed trails. The University CPU and Hillcrest FPA does not propose upzoning within the City's MHPA areas. The Blueprint SD Initiative

provides a land use and policy framework to guide future land use updates and SDMC amendments, but does not propose actual development, nor does it identify site-specific land use designations and zoning. Future land use updates and SDMC amendments which propose upzoning in areas that are within or adjacent to the MHPA would be reviewed for consistency with the analysis in the PEIR and potential impacts to the MHPA would be addressed at that time. Furthermore, all development in the City is required to comply with the City's ESL Regulations. Should ESL impacts be identified during ministerial review of a future project, the project would be processed under a discretionary permit to ensure consistency with the City's ESL Regulations, the Biology Guidelines, and the provisions of the Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and a Vernal Pool Habitat Conservation Plan (VPHCP) to protect the on-site sensitive resources. The project's compliance with the City's MSCP SAP and VPHCP are discussed in Sections 4.10.2.2(h) and (i). See response to comments A3-5, A3-7, A3-10, A3-18, A3-20, and A3-25 under comment letter A3 for a discussion of how the proposed project complies with and

**O11-43:** Securing funding for the MSCP and VPHCP is an ongoing joint effort between local, regional, and state agencies, including the City. For example, SANDAG's transportation mitigation fund is a revenue source that the City can pursue for habitat restoration projects. Additionally, funding for the MSCP is determined annually as part of City's annual budget and is outside of the scope of this project.

**O11-44:** See response to comments O15-14 and O15-36 under comment letter O15 for a discussion park and open space impacts.

**O11-45:** The comment on funding for the MSCP and unauthorized use of trails has been noted. Please see response to O11-43.

**O11-46:** In mitigation measure MM-AQ-1, there is a requirement that "individual development projects shall not exceed criteria pollutant significance thresholds detailed in the latest City's CEQA Significance Thresholds."

The language in the remainder of MM-AQ-1 has been revised and clarified in the Final PEIR

**O11-47:** Comment noted.

## Comment Letter O12 - Save Our Heritage Organisation

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] RE: Hillcrest Focused Plan Amendment Draft March 2024  
**Date:** Tuesday, April 30, 2024 9:24:37 AM  
**Attachments:** [HillcrestFocusedPlanAmendmentSOHOComments42924.pdf](#)

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**From:** Save Our Heritage Organisation <sohosandiego@aol.com>  
**Sent:** Monday, April 29, 2024 4:16 PM  
**To:** Mulderig, Shannon <SLMulderig@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] RE: Hillcrest Focused Plan Amendment Draft March 2024

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

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Good afternoon, Shannon,

Please see SOHO's comments for the Hillcrest Focused Plan Amendment, attached here.

Thank you,

Dean Glass  
Administrative Manager  
Save Our Heritage Organisation (SOHO)  
Office: 3525 Seventh Avenue • San Diego, CA 92103  
Mailing: PO Box 80788 • San Diego, CA 92138-0788  
619-297-9327 (Office)

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O12-1



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

April 29, 2024

Shannon Mulderig  
Senior Planner  
City Planning Department  
City of San Diego

RE: Hillcrest Focused Plan Amendment Draft March 2024

Dear Ms. Mulderig,

Save Our Heritage Organisation (SOHO) appreciates the opportunity to offer feedback on the March 2024 Hillcrest Focused Plan Amendment Draft, particularly regarding Chapter 5: LGBTQ+ Cultural and Chapter 11: Historic Preservation.

O12-1  
cont.

We reiterate concerns previously submitted by SOHO and the San Diego LGBTQ Historic Sites Project group, some of which do not appear to have been incorporated into the revised March 2024 Draft. Chapter 5 lacks specific language emphasizing the importance of identifying designated and potential LGBTQ+ historic sites. Although Chapter 6 addresses this, Chapter 5 should also contain such statements to establish a connection between culture and history.

O12-2

The LGBTQ+ Cultural District should prioritize preserving, maintaining, and promoting local LGBTQ+ history alongside cultural components. Designated historic LGBTQ+ sites must be preserved and incorporated into any new development, as they serve as anchors linking past, present, and future.

O12-3

Key objectives of the LGBTQ+ Cultural District should acknowledge the significance of social service agencies and community-based organizations, in addition to entertainment and commercial establishments. Recommendations include adding photos and accurately reflecting historically designated sites on maps. Community outreach should encompass Trans, API, Black, BIPOC, and Indigenous communities, ensuring their voices are heard and their history preserved.

O12-4

Interpretive elements should avoid superficial treatments and instead highlight genuine LGBTQ+ cultural and historic sites. These elements should be integrated with a strong financial-backed maintenance program to prevent deterioration.

O12-5

The walking corridor and site list should incorporate additional historically significant locations, such as:

- # 9 Albert Bell's Residence at 3780-3786 Fifth Avenue should use the official historic designated name: The Center/Gayzette/Albert Bell Building. The San Diego AIDS Project was located at 3777 Fourth Avenue (across the alley from # 9 and should be identified).

O12-6

- The AIDS epidemic in the 1980s established AIDS services at Vauclain Point at the north edge of Front Street (the former site of a SD County facility and later the SD Hospice). That area along with #16 UCSD Owen Clinic has a long history related to AIDS and Hillcrest.
- The Obelisk Bookstore at 1037 University was a landmark bookstore for the LGBTQ+ community.
- The SAGE of California Center at 3138 Fifth Avenue was an important location and drop-in center for lesbians and gay men when it opened in 1999.
- Albert Bell's final residence at 3815 Vermont Street should be located on the map.
- Contact Lambda Archives for the location of an electrolysis business on University Avenue that served the Trans community.

O12-6  
cont.

Policy recommendations include incorporating the stories of marginalized LGBTQ+ communities and explicitly stating the preservation of designated historic LGBTQ+ sites and the identification of potential sites as essential components.

O12-7

Chapter 6 should accurately reflect designated LGBTQ+ historic sites and work collaboratively with Chapter 5 to preserve and designate LGBTQ+ historic sites.

O12-8

We do not believe that development by right of historic facades with a 10' set back should be allowed without further review for contributors to the historic district. Each Historic site may have unique character defining elements and history, which may require different treatments to ensure adequate preservation of these features. This street setback should be 12' minimum.

O12-9

Setbacks for towers above 75 ft should be set back 50 feet from the Street. This is what is allowed along "J" street in the ballpark district downtown and it has maintained light and air and allowed a vibrant pedestrian orientated environment. While allowing dense towers appropriate to a modern downtown central business and residential district.

O12-10

Thank you for reviewing our feedback. Preserving Hillcrest's LGBTQ+ history is crucial for embracing its past, present, and future identity.

O12-11

Sincerely,



Bruce Coons  
Executive Director  
Save Our Heritage Organisation (SOHO)

**O12: Responses to Save Our Heritage Organization Comment Letter**

**O12-1:** Comment noted. This comment pertains to the Hillcrest Focused Plan Amendment (FPA) text and does not raise any issues regarding the adequacy of the Draft Program Environmental Impact Report (PEIR).

**O12-2:** Comment noted. This comment pertains to the Hillcrest FPA text and does not raise any issues regarding the adequacy of the Draft PEIR.

**O12-3:** Comment noted. This comment pertains to the Hillcrest FPA text and does not raise any issues regarding the adequacy of the Draft PEIR.

**O12-4:** Comment noted. This comment pertains to the Hillcrest FPA text and does not raise any issues regarding the adequacy of the Draft PEIR.

**O12-5:** Comment noted. This comment pertains to the Hillcrest FPA text and does not raise any issues regarding the adequacy of the Draft PEIR.

**O12-6:** Comment noted. This comment pertains to the Hillcrest FPA text and does not raise any issues regarding the adequacy of the Draft PEIR.

**O12-7:** Comment noted. This comment pertains to the Hillcrest FPA text and does not raise any issues regarding the adequacy of the Draft PEIR.

**O12-8:** Comment noted. This comment pertains to the Hillcrest FPA text and does not raise any issues regarding the adequacy of the Draft PEIR.

**O12-9:** Comment noted. This comment pertains to the Hillcrest FPA text and does not raise any issues regarding the adequacy of the Draft PEIR.

**O12-10:** Comment noted. This comment pertains to the Hillcrest FPA text and does not raise any issues regarding the adequacy of the Draft PEIR.

**O12-11:** Comment noted.

## Comment Letter O13 - University City Peeps

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] UC PEEPS" Comments on University Community Plan Update Draft EIR  
**Date:** Thursday, April 25, 2024 8:10:24 AM  
**Attachments:** [2024 Draft Mobility Technical Report Review - April2024.docx](#)  
[~WRD0000.jpg](#)

---

**From:** University City Peeps <universitycitypeeps@gmail.com>  
**Sent:** Wednesday, April 24, 2024 2:57 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; Andrew Wiese <awiese@sdsu.edu>; Chris Nielsen <cn@adsc-xray.com>  
**Subject:** [EXTERNAL] UC PEEPS' Comments on University Community Plan Update Draft EIR

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

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To Whom It May Concern:

On behalf of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, I'm submitting our combined comments on the University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. (See attachment with expert Traffic Analysis relative to Governor Drive.)

O13-1

O13-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

O13-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

O13-4

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

O13-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

O13-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

O13-7

O13-8

Sincerely,  
Bonnie Kutch, Resident of University City  
Founding Member of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, an  
Association of 500-plus University City Residents and Property Taxpayers





Bonnie Kutch | University City PEEPS | 619.299.1010

## **Review of University City Community Plan Update Draft Mobility Technical Report**

**dated March 2024 – (review conducted April 2024 by Charles Frasier(frasierf@ix.netcom.com))**

The Mobility Technical Report summarizes the physical and operational conditions of the planned mobility system outlined in the University Mobility Element. This report is one component of the University Community Plan Update, identifying the planned mobility improvements culminating with an analysis of all travel modes under the proposed plan horizon year of 2050.

The Proposed Plan is a strategy to address existing and forecast deficiencies related to the transportation system within the University community. It also strives to improve personal mobility through a balanced, multimodal transportation network, which supports the updated land use vision for University and aligns with the City's General Plan, Blueprint SD, and Climate Action Plan (CAP). The mobility system is comprised of roadway and freeway system, pedestrian and bicycle infrastructure, and public transit.

### **Analysis Methodology**

Appendix A Existing Conditions Report describes the methodology used to determine the study area and analyze the transportation system for the University community. Since the adoption of the 2008 California Complete Streets Act (AB 1358), the City of San Diego has employed multimodal analysis procedures to assess mobility needs for pedestrians, cyclists, and transit users. **Analysis of the existing pedestrian, bicycle, transit, and vehicular system can be found in Appendix A.**

Vehicle Miles Traveled – SB 743 Analysis Senate Bill 743 (SB 743) was signed into law in September 2013, modifying the existing California Environmental Quality Act (CEQA) by removing auto delay, level of service (LOS), parking and other vehicular capacity measures as metrics of transportation system impacts for mixed-use, infill or transit-oriented development projects. Vehicle miles traveled (VMT) is considered the new analysis metric used to measure transportation impacts and must be incorporated by July 1, 2020, statewide. VMT reflects the land use type, intensity, and location in relation to the capacity and roadway connectivity of the transportation network. It is also influenced by the availability and quality of multimodal facilities, and system operations. VMT is metric that measures the number of vehicle trips generated and the length or distance of those vehicle trips. For transportation analysis, VMT is generally expressed in VMT per capita for a typical weekday. VMT does not directly measure traffic operations but instead measures the efficiency of the transportation system and is expressed as a function of population or employment.

**The VMT assessment for the University Community Plan Update, circa 2050, is discussed in Appendix B – Blueprint SD, University CPU, and Hillcrest FPA Vehicle Miles Traveled (VMT) Analysis.**

Roadway segments were assigned Level of Service (LOS) ratings of A through E as shown in Appendix A Table 2-16. LOS rating E is considered to be a roadway's capacity. Average Daily Traffic (ADT) volumes exceeding LOS E are given LOS rating F. Threshold for Determination of a Significant Transportation VMT Impact are shown in Appendix B Table 3-1. **Projects with an LOS grade of F**

O13-9

exceed these thresholds and would have a significant adverse California Environmental Quality Act (CEQA) transportation impact.

## Results

**This review only addresses the results of the Roadway Segment Analyses for Governor Drive.**

Governor Drive functions as a two-way east-west, 4-lane Major Arterial with raised medians and a curb-to-curb width of approximately 68-80 feet. Governor Drive is lined with sidewalks and curbs on both sides of the street for the entire length of the street. Parallel parking is available on both sides of the street along most segments of the roadway west of Gullstrand Street. Class II bike lanes (no buffer) are partially present on both sides of the street between Genesee Avenue and Gullstrand Street. The posted speed limit is 35 mph. Access to I-805 is provided at the eastern terminus of Governor Drive. Existing conditions Average Daily Traffic (ADT) volumes for the roadway segments were provided by Accurate Video Counts Inc and measured in April and May 2015.

The University CPU plans to reduce the number of travel lanes from a 4-lane Major Arterial to a 2-lane Major Arterial on Governor Drive (West End to Greenwich Drive) to create a Complete Street consistent with City goals in the General Plan, CAP, Vision Zero, and Complete Streets Policy to encourage walking, biking, and taking transit. The plan includes continuous buffered bike lanes along Governor Drive, enhanced pedestrian and intersection treatments, and traffic calming measures, while maintaining on-street parking. Other improvements include a protected intersection at is found to be Genesee Avenue and Governor Drive. University CPU plan Average Daily Traffic (ADT) volumes for the roadway segments were determined from SANDAG's Series 14 Activity Based Model (ABM2+). An assumption of the analysis revealed by the figure in the executive summary of Appendix A is that there will be no growth of single occupancy vehicles (SOVs) from existing conditions to the University CPU plan conditions.

Table 7-4 of Appendix A shows the Existing Conditions Summary of the Roadway Segment ADT Based Analysis. From Regents Road to the I-805 SB Ramps, **Governor Drive is found to have a LOS E Capacity of 40,000 with an Average Daily Traffic (ADT) volume of 16,796 to 19,737. The v/c Ratio calculated by dividing the ADT volume by roadway segment's capacity is found to be 0.420 to 0.493 resulting in an acceptable Level of Service (LOS) rating of B.**

Table 3-11 of the Draft Mobility Technical Report shows the Roadway Segment Analysis – Proposed Plan Conditions Analysis. From Regents Road to the I-805 SB Ramps, **Governor Drive is found to have a LOS E Capacity of 20,000 with an Average Daily Traffic (ADT) volume of 22,480 to 32,140. The v/c Ratio calculated by dividing the ADT volume by roadway segment's capacity is found to be 1.124 to 1.607 resulting in an unacceptable Level of Service (LOS) rating of F.**

(The Plan v/c ratio is more than double the existing ratio due, in part, to the presence of traffic lights along the road segment.)

Because the analysis assumes that there will be no growth in SOVs from existing conditions to the University CPU plan conditions, the results of the plan analysis are applicable to the existing conditions if Governor Drive were, tomorrow, suddenly converted from a 4-lane Major Arterial to a 2-

O13-9  
cont.

lane Major Arterial with continuous buffered bike lanes, enhanced pedestrian and intersection treatments, and traffic calming measures, and a protected intersection at Genesee while maintaining on-street parking.

**The conclusion to be drawn from the Mobility Analysis is that converting Governor Drive from a 4-lane Major Arterial to a 2-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report.**

**O13-9  
cont.**

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**O13: Response to University City Peeps Comment Letter**

**O13-1:** The proposed complete street for Governor Drive would reduce the number of vehicular travel lanes on Governor Drive from four to two in order to add continuous Class II buffered bike lanes. The proposed bicycle facility improvements on Governor Drive would implement the City's General Plan Mobility Element, Bicycle Master Plan, and Climate Action Plan (CAP) policies that support enhancements to the mobility network to accommodate non-vehicular modes. The planned improvements are intended to increase safety and calm traffic so that the roadway could be more usable for all modes, including biking, walking, and rolling. In addition, these complete street improvements will have a positive impact on mode shift, and reductions in vehicle miles traveled and greenhouse gas emissions consistent with the City's CAP goals.

Vehicle miles traveled (VMT) per capita and per employee are the numbers of miles people are traveling in vehicles as a per capita or per employee measurement; it is not a measurement of congestion or level of service of a roadway. Since the passage of Senate Bill (SB) 743 in 2013 and subsequent adoption of the Technical Advisory on evaluating Transportation Impacts in CEQA in 2018, CEQA Guidelines Section 15064.3 no longer uses traffic counts, auto delays, levels of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Furthermore, the proposed Governor Drive design changes would support multi-modal transportation and align with the City's overarching mobility and CAP policy framework.

**O13-2:** The VMT analysis in Appendix J of the Program Environmental Impact Report (PEIR) used the Series 14 Activity Based Model (ABM2+) from the San Diego Association of Governments (SANDAG) which is the most recent model available from SANDAG and which was used for the 2021 SANDAG Regional Plan. As discussed in Chapter 4.14 of the PEIR, although citywide VMT per capita and citywide VMT per employee with the University CPU would be at 73% and 72% of the regional mean, VMT-related impacts of the University Community Plan Update (CPU) would be significant because the timing of future SANDAG Regional Plan transportation investments that could improve VMT levels cannot be ensured at this time. All future development within the University CPU area would be required to comply with the City's Mobility Choices Regulations which require investments in active transportation infrastructure and amenities that will reduce Citywide VMT, as identified in mitigation measure MM-TRANS-1. Future discretionary development projects proposed in accordance with the University CPU would also be required to undergo environmental review, which would incorporate new information from any future SANDAG Regional Plan as appropriate. Analyzing VMT, which is the metric for determining potential transportation impacts under CEQA, does not include an assessment of traffic service levels at peak hours. While the mitigation is required, the PEIR still identified VMT-related impacts to be significant. The Mobility Technical Report was prepared to inform mobility decisions for the University CPU, but is not part of the University CPU, and was not analyzed in the PEIR.

**O13-3:** As discussed in Chapter 4.18, and specifically 4.18.4, Issue 2, of the Draft PEIR, the major evacuation routes in the University CPU area are Interstates (I-) 5 and 805 and State Route (SR-) 52, which are accessible by Regents Road, Genesee Avenue, Governor Drive, Nobel Drive, Gilman Drive/La Jolla Colony Drive, and Sorrento Valley Road. The addition of Class II bike lanes to Governor Drive, as also identified in the City's Bicycle Master Plan, would involve restriping lanes; no physical

barriers would be added to these sections of Governor Drive. In the event of an emergency, vehicles would be able to access the full existing curb-to-curb width of the road. Emergency-imposed traffic routing could also redirect all traffic to drive in one direction away from a potential hazard or emergency situation. This information has been added to Chapter 4.18.4, Issue 2 and Chapter 4.14.4 Issue 4 (b) as clarification in the PEIR. Additionally, future discretionary development projects proposed in accordance with the University CPU would be required to complete environmental review to determine potential impacts related to emergency access and all future ministerial and discretionary projects would be required to demonstrate their compliance with San Diego Fire Code including requirements related to emergency access.

**O13-4:** In the letter from San Diego Unified School District (SDUSD) to the City dated September 14, 2023, SDUSD indicated a need for a school in the vicinity of La Jolla Village Drive and Genesee Avenue. The need for an elementary school at this location is identified in the Draft PEIR [Section 4.12.4(c)]. The University CPU includes policies that encourage coordination between the City and SDUSD to explore options for the provision of future school facilities, including a potential elementary school facility within the vicinity of La Jolla Village Drive and Genesee Avenue. Coordination between the City and SDUSD would continue as implementation of the community plan occurs; nevertheless, it is ultimately the responsibility of SDUSD to plan for the potential expansion of existing and/or development of new school facilities. Because this school site and other school service issues would require further environmental analysis in the future, the PEIR found this environmental impact to be significant.

**O13-5:** A description and analysis of the University Community Planning Group's Community-Preferred Alternative has been incorporated into the Reduced Density Alternative in the Final PEIR. This alternative, formerly called the Blueprint SD Initiative Reduced Density Alternative in the PEIR, has been revised to include a reduction of land use intensities for both the University CPU and Hillcrest Focused Plan Amendment (FPA) as well as for the Blueprint SD Initiative.

Under the Reduced Density Alternative, the University CPU would have the following reductions: The Urban Village areas would have a maximum of up to 145 dwelling units per acre (73 fewer dwelling units per acre than the maximum allowed under the same designation in the proposed plan). Residential capacity under this alternative would allow approximately 22,000 new homes and employment capacity would allow approximately 55,000 new jobs.

See Chapter 8.0 of the PEIR for the full discussion of the Reduced Density Alternative.

An EIR is required to describe a range of reasonable alternatives to the project which would feasibly attain most of the basic project objectives and would avoid or lessen the significant effects of the project. The High Density Alternative was included in the alternatives analysis at the request of multiple climate action, housing, bicycle, and public transportation advocacy groups. The High Density Alternative was included in the Draft PEIR because it would meet the project objectives and feasibly reduce environmental impacts related to energy, greenhouse gas emissions, and transportation.

**O13-6:** The Blueprint SD Initiative, Hillcrest FPA, and University CPU are all planning-level documents intended to implement the City's General Plan including the Housing Element and CAP, among other

City plans and policy documents. The scope of the project, which includes all three planning initiatives, is clearly defined in Section 3.5 of the PEIR.

As explained in Section 3.5.1.3 of the PEIR, the environmental analysis conducted for these projects found similar environmental impacts that required similar mitigation frameworks. Furthermore, the Blueprint SD Initiative sets forth the policy and land use framework for community plans in the City and the City identified an opportunity to address the potential environmental impacts of the University CPU and Hillcrest Focused Plan Amendment (FPA) congruently with those of the Blueprint SD Initiative since these plans were all developed consistent with the proposed General Plan refresh (Blueprint SD Initiative). Mitigation measures shall be implemented under each individual planning-level document.

**O13-7:** The PEIR provides a program-level analysis of the potential impacts that could occur with implementation of the University CPU. As a programmatic document, the project description of the PEIR does not provide project-level specifics but does provide feasible development buildout which is analyzed throughout the PEIR. The PEIR includes a discussion of environmental impacts related to aesthetics (Section 4.1), air quality (Section 4.2), biological resources (Section 4.3), greenhouse gas emissions (Section 4.7), noise (Section 4.11), public services (Section 4.12), recreation (Section 4.13), transportation (Section 4.14), and wildfires (Section 4.18). This comment is general in nature and does not include specific critiques of the environmental analysis; no further response is necessary.

**O13-8:** Comment noted. The Complete Communities program is not a part of the scope of the project analyzed in the PEIR and the environmental impacts of the Complete Communities program were addressed in Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). The comment does not raise an issue related to the adequacy of the analysis in the PEIR. No further response is required.

**O13-9:** The comment is in regard to the Draft Mobility Technical Report, which was prepared to inform mobility decisions for the University CPU, but is not part of the University CPU, and was not analyzed in the PEIR. The traffic analysis for the PEIR is based on the Vehicle Miles Traveled Analysis (Appendix J of the PEIR) as required by CEQA. See response to comment O13-2 for a response to VMT analysis.

## Comment Letter O13 - University City Peeps, Law Offices of Andrea Contreras on behalf of

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comment Letter to University Plan Update DEIR  
**Date:** Thursday, April 25, 2024 8:10:08 AM  
**Attachments:** [DEIR Comment Letter-FINAL.pdf](#)

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**From:** Andrea Contreras <[andrea@sddirtlaw.com](mailto:andrea@sddirtlaw.com)>  
**Sent:** Wednesday, April 24, 2024 12:44 PM  
**To:** [PLN\\_PlanningCEQA](mailto:planningceqa@sandiego.gov) <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** Bonnie Kutch <[bkutch@kutchco.com](mailto:bkutch@kutchco.com)>; Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)>  
**Subject:** [EXTERNAL] Comment Letter to University Plan Update DEIR

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Please see attached.

Thank you,  
Andrea

**Andrea Contreras, Principal**  
**San Diego Dirt Law**  
**858.733.0002**  
[andrea@sddirtlaw.com](mailto:andrea@sddirtlaw.com)  
[www.sddirtlaw.com](http://www.sddirtlaw.com)



Law Offices of Andrea Contreras  
LAND USE | REAL ESTATE | ENVIRONMENTAL

April 24, 2024

**By email only:** [planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)

Ms. Suchita Lukes  
Planner for University City Community Plan Update  
City of San Diego Planning Department  
202 C Street  
San Diego, CA 92101

Re: Comment Letter to the Draft Program Environmental Impact Report for the  
Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community  
Plan, and University Community Plan and Local Coastal Program Update

Dear Ms. Lukes:

I represent UC Neighbors for Responsible Growth, a.k.a UC PEEPs, an association of community members living in the University Community planning area. I submit this comment letter to the above-referenced draft Environmental Impact Report (“DEIR”) on their behalf.

I. The DEIR Analysis of Proposed Changes to Governor Drive Is Legally Deficient

The DEIR does not adequately inform the public of the City’s plans for Governor Drive. The current University Plan identifies Governor Drive as a four-lane major street (Current University Plan, p. 145.) It also suggests that truck routes should be limited to five streets, and Governor Drive is one of them.

The DEIR does not identify the existing condition of Governor Drive as a four-lane major street and preferred truck route. It only identifies the proposed two-lane Governor Drive in Figure 3-24, with no indication of how the preferred truck route should be addressed or whether that impact has been analyzed. The Mobility Technical Report (“MTR”), an Appendix to the Plan Update, but not the DEIR, includes an Existing Conditions Summary (as an appendix to the MTR) from 2018, which identifies the current Governor Drive as four lanes and discusses the proposal to reduce Governor Drive to a two-lane major arterial. (MTR, Appendix A Existing Conditions Report, p. 7-7, and MTR, Figure 3-3 and Table 3-11).<sup>1</sup> CEQA requires an EIR to identify existing conditions and the DEIR’s failure to identify the existing condition of Governor Drive is legally inadequate—the DEIR should be revised to remedy this error.

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<sup>1</sup> Incidentally, the City of San Diego Traffic Manual definitions do not include anything called a two-lane major arterial. Even with cross-referencing, it is impossible for the reader to understand what the City is proposing for Governor Drive.

## Law Offices of Andrea Contreras

### II. The DEIR's Conclusion Regarding Adequate Emergency Access Is Not Supported By Substantial Evidence

CEQA requires that an EIR's conclusion be supported by substantial evidence. (CEQA Guidelines §15091(b).) The DEIR fails to support the finding of sufficient emergency access with substantial evidence.

The DEIR states “[b]ased on the existing roadway network in place combined with improvements required by the City as development occurs and required consistency with the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant. (DEIR, p. 4.14-22.)

This conclusion is unsupported by the evidence. As discussed in the prior section, the project proposes to reduce Governor Drive from four lanes to two. The conclusion of a less than significant impact to emergency access relies on the existing road network. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot legally conclude the impact will be less than significant.

In fact, the Mobility Technical Report directly contradicts this conclusion in the following manner:

Vehicular Analysis: Chapter 3.4 contains the vehicular Roadway Segment Analysis, Peak Hour Arterial Analysis and Peak Hour Intersection Analysis for Governor Drive. With full buildout of the plan, it is anticipated that decreased levels of service for both roadway segments and intersections, and increased vehicular travel times along Governor Drive will occur. (MTR, p. 81)

By stating that it is relying on the existing roadway network to find less than significant impacts related to emergency access when the plan clearly proposes reductions to the capacity of the existing roadway network, the City has failed to support its finding with substantial evidence and this section of the DEIR is legally inadequate. (*See generally, Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, (discussing the substantial evidence standard).)

The designation of the document as a program EIR with the potential for future analysis does not excuse the City from performing analysis of impacts it knows for certain. The proposed reduction of four lanes to two on Governor Drive is a specific enough proposal that the City could perform it now. “. . . [T]iering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration.” (14 Cal. Code Regs., Div. 6,

Ch. 3 (“CEQA Guidelines”) §15152(b).). The DEIR must be revised to include specific analysis of emergency access with the reduction in capacity on Governor Drive.

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III. The DEIR Fails to Analyze School Requirements from the San Diego School District

The DEIR states

“No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. Policies include, but are not limited to, 7.3B, which directs the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within University, as needed.”

DEIR, p. 4.12-42.

The DEIR also states that due to the uncertainty of the impacts and the unknown ability to mitigate them, the impacts associated with the construction and operation of new schools would be potentially significant.

In a memorandum submitted on September 14, 2023, the San Diego School District informed the City the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

5

Furthermore, the cost of new schools’ design and construction is forecasted at \$910 million, not including the cost of acquiring the land necessary to construct the schools. The memorandum urges the City to partner with the School District to plan for development of new school construction in advance of occupancy of new housing units.

The conflict between the DEIR suggesting the solution to more school sites will come from the district and the district looking to the plan to identify school locations is not discussed in the DEIR. The conflict suggests there are unanalyzed significant impacts. CEQA requires an analysis of all significant impacts in order to determine if there is adequate mitigation. (*Vineyard Area Citizens*, 40 Cal.4th 412.). The DEIR should be revised to include this analysis.

IV. Insufficient Alternatives Analysis

CEQA requires a reasonable range of alternatives to the project under review. (CEQA Guidelines §15126.6(a).) The range of alternatives should be feasible, achieve the basic objectives of the project, and avoid or substantially lessen one or more of the significant effects. (CEQA Guidelines §15126.6(a).)

6

## Law Offices of Andrea Contreras

The DEIR does not meet these basic requirements for a legally sufficient alternatives analysis to the proposed UC Plan. The DEIR only includes one alternative relating specifically to the UC Plan, and that alternative increases density. Furthermore, the high-density alternative states it is infeasible as the level of development in that alternative is unlikely. (DEIR, p. 8-29.) This cannot be a viable alternative if it is infeasible. Finally, as an infeasible alternative, it should not be identified as the environmentally superior alternative.

The DEIR should be revised to include the community's preferred alternative as an alternative.

V. Use of a Program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act ("CEQA")

According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decisionmakers and the public. (Ca. Pub. Res. Code §21061). The DEIR is more than 800 pages long, not including the technical appendices and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to garnish information. The DEIR should be separated into three separate EIRs for each proposed plan update.

Thank you for the opportunity to comment on the DEIR. We look forward to the City's response to our comments.

Sincerely,



Andrea Contreras

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RTC-683

**O14: Responses to Law Offices of Andrea Contreras on behalf of University City Peeps**  
**Comment Letter**

**O14-1:** The comment is an introduction to the letter.

**O14-2:** The comment letter mentions that the “current University Plan identifies Governor Drive as a four-lane major street (Current University Plan, p.145). It also suggests that truck routes should be limited to five streets, and Governor Drive is one of them.” While this suggestion for Governor Drive as a truck route is included as a proposal in the current Community Plan, this does not necessarily mean that Governor Drive was designated as a truck route.

The Draft PEIR does not identify or discuss truck routes, and the City’s Transportation Department has confirmed that Governor Drive is not a designated truck route. Tables 3-6 and 3-7 have been added to Section 3.5.3.1(c) of the Final Program Environmental Impact Report (PEIR) to describe the existing and proposed roadway and bicycle network of the University Community Plan Update (CPU) area. Section 4.14 of the Draft PEIR also includes a description of the different roadway classifications in the existing roadway network. The Mobility Technical Report was prepared to inform the mobility decisions for the University CPU, but it is not an Appendix to the University CPU and the PEIR, nor was it analyzed in the PEIR. The City prepared a Vehicle Miles Traveled analysis in accordance with Senate Bill 743 and the City’s CEQA Significance Determination Thresholds. See response to comments O13-1 and O13-2 under comment letter O13 for further information regarding the analysis of road congestion. Any future proposal to reduce Governor Drive would undergo more in-depth mobility and transportation analysis.

**O14-3:** The Mobility Technical Report was prepared to inform the mobility decisions for University CPU, but it is not part of the University CPU, and was not analyzed in the Draft PEIR. Regarding the concern about emergency access, see response to comment O13-3 under comment letter O13. Regarding the concern about the decrease in level of service on Governor Drive, see the response to comment O13-1 under comment letter O13.

**O14-4:** Section 4.14.4, Issue 4 (b) and Section 4.18.4 Issue 2 of the Draft PEIR have been updated to include a description of how the proposed changes to Governor Drive could affect emergency access.

**O14-5:** See response to comment O13-4 under comment letter O13.

**O14-6:** See response to comment O13-5 under comment letter O13

**O14-7:** See response to comment O13-6 under comment letter O13.

## Comment Letter O15 - University Community Group

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: UCPG Comments for the University DEIR, SCH No. 2021070359  
**Date:** Thursday, May 16, 2024 8:17:03 AM  
**Attachments:** [2024\\_05\\_15\\_UCPG\\_DEIR\\_Comment\\_final.pdf](#)

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**From:** Chris Nielsen <cn@adsc-xray.com>  
**Sent:** Wednesday, May 15, 2024 1:32 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>  
**Subject:** [EXTERNAL] UCPG Comments for the University DEIR, SCH No. 2021070359

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

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Please accept these comments from the University Community Planning Group on the University Community Draft EIR, SCH No. 2021070359.

O15-1

Thank you,

Chris Nielsen  
UCPG Chair

**University Community Planning Group**

**Comments for the University Community Draft Environmental Impact  
Report**

**March 14, 2024, SCH No. 2021070359**

**Approved May 14, 2024, by the UCPG**

**Submitted to the City of San Diego May 15, 2022**

P 33. S4.2 (Alternative 2)

S.4.2 "Alternative 2" for the University Community is for INCREASED density and development above and beyond that recommended in the Draft Plan and is made without any specificity as to the visual impacts of that alternative, other than by virtue of comparison of square feet of commercial development and residential units. Its impact cannot be evaluated without specificity as to the development changes planned in the Alternative. With the additional development and increase in density/population put forth in Alternative 2 come additional adverse environmental impacts. The City's draft plan proposes 40,582,000sq ft of additional non-residential building in the University CPU (as opposed to Alternative 2 which proposes 46,582,000) and 30,480 new homes (as opposed to Alternative 2 which proposes 56,480). See DEIR p. S-6 and 3-50. ***The DEIR should explain how the conclusions for Alternative 2 were made without detailed analysis of that Alternative and specifically why the Community Discussion Draft's Community Scenario was not analyzed as an EIR Alternative. The DEIR should explain the criteria used to decide which Alternatives in the DEIR were analyzed.***

O15-2

The UC Draft Plan and the DEIR fail to consider the fact that approximately 11,000 new "beds" have been built to house UCSD students on campus since the plan update process began more than 5 years ago and the pending Revision to the 2018 UC San Diego Long Range Development Plan, extending through 2040, will create 5,500 additional student beds with 3 projects. ***UCSD's housing development and anticipated future development needs to be analyzed for in the DEIR for its impact on the community.***

O15-3

Additionally, the DEIR fails to consider any alternative with lesser development intensity or to set forth different developmental components which would minimize environmental impacts. Such alternative development and plan alternatives were recommended to the City by UCPG subcommittee in its proposed changes to the draft plan dated July 11, 2023, many of which the City failed to incorporate in the currently pending Draft Plan of March 2024. ***The DEIR should explain the criteria used in the selection of Alternatives to be analyzed.***

O15-4

Furthermore, the University Community is an already densely developed area in both the commercial and residential context. UCPG questions the need for the housing density set forth in the updated plan. In its grant proposal to SANDAG to undertake the plan update, the City projected the need for 10,000-30,000 new residential units. the Draft plan now envisions doubling the current population with 65,360 new residents. However, the SANDAG Series 15 forecast projected a TOTAL of 65,345 new residents in all of San Diego by 2050. Incredibly, the City's Draft Plan for UC houses the number (Per SANDAG) of **ALL new residents predicted to move to San Diego by 2050** in the University community. See SANDAG Series 15 Forecast. <https://www.sandag.org/-/media/SANDAG/Documents/PDF/data-and-research/socioeconomics/estimates-and-forecasts/sr-15-infobits-2024-04-01.pdf>

O15-5



Nowhere in the DEIR is the actual or projected need for the extent of stated development density proposed by the draft plan addressed or evaluated. In fact, With less development and less population the environmental impacts decrease.

O15-5  
cont.

P 36. S.5 (Aesthetics issue 1)

The University community has some of San Diego's largest areas of open, protected space and sensitive MHPA habitat. Its preservation and protection are both essential to the lifestyle in the community, and its draw to both residents and occupiers of commercial spaces, as well as mandated by law. The UCPG is concerned with construction of multiple story structures adjacent to canyons and open space without adequate setbacks or building transition line slopes. and open space is problematic for several reasons, only one of which is aesthetics. Such construction both blocks the scenic views/vistas of adjacent properties and cross-canyon neighbors, and it also destroys the natural beauty/views/vistas from within the open space and canyons. The significance can be mitigated in part with appropriate design measures as recommended by the UCPG: 30-foot setbacks with 45-degree transition plane angles. ***The DEIR should analyze the impacts of these two key parameters, setbacks and transition plane angles in building design on the environment of adjacent canyons and open space.***

O15-6

P 37. S.5 (Aesthetics issue 3/4)

The University community has some of San Diego's largest areas of open, protected space and sensitive MHPA habitat. Its preservation and protection is both essential to the lifestyle in the community, and its draw to both residents and occupiers of commercial spaces, as well as mandated by law. The UCPG is concerned with construction of multiple story structures adjacent to canyon and open space is problematic for several reason only one of which is aesthetics. Such construction both blocks the scenic views/vistas of adjacent properties and cross-canyon neighbors, and it also destroys the natural beauty/views/vistas from within the open space and canyons. The significance can be mitigated in part with appropriate design measures as recommended by the UCPG, see above Aesthetics issue 1.

O15-7

P 37. S.5 (Aesthetics issue 5)

The University community has some of San Diego's largest areas of open, protected space and sensitive MHPA habitat. Its preservation and protection are both essential to the lifestyle in the community, and its draw to both residents and occupiers of commercial spaces, as well as mandated by law. The UCPG is concerned with construction of multiple story structures adjacent to canyon and open space is problematic for several reason only one of which is aesthetics. Much more than an issue of aesthetics, it is an issue of survival for the habitat and endangers the continued existence of wildlife in these protected areas. Light and glare from both exterior and interior lighting from buildings adjacent to open/canyon space has a detrimentally impacts the wildlife as do windows which provide glare resulting in bird strikes. The significance can be mitigated in part with appropriate design measures as recommended by the UCPG, see above Aesthetics issue 1.

O15-8

P 38. S-4 4.3 (biological resources issue 1, 3, 4, 5)

The University community has some of San Diego's largest areas of open, protected space and sensitive MHPA habitat and its preservation and protection are both essential to the lifestyle in the community, and its draw to both residents and occupiers of commercial spaces., as well as mandated by law. The UCPG is concerned with construction of multiple story structures adjacent to canyon and open space is problematic for several reason only one of which is light and glare from both exterior and interior lighting from buildings adjacent to open/canyon space which has a detrimentally impacts the wildlife as do windows which provide glare resulting in bird strikes. Access from one area of open space to another (i.e. wildlife corridors another is also key to the survival of wildlife. The significance can be mitigated in part with appropriate design measures as recommended by the UCPG: 30-foot setbacks with 45-degree transition plane angles. ***The DEIR should analyze the impacts of these two key parameters, setbacks and transition plane angles, in building design on the biological resources (wildlife, shading) of adjacent canyons and open space.***

O15-9

P 44. S.5 - 4.7 (greenhouse gases issue 1 & 2)

The studies considered with respect to traffic data in support of the DEIR and Draft Plan are almost 10 years old and do not include conditions at high use times, nor on major thoroughfares. Without this information, complete analysis of climate effects is inadequately considered. The City's proposed Plan for UC needs to address this issue and the DEIR should explain the use of past data to project likely future impacts to its climate analysis.

O15-10

Additionally, nowhere in the UC Draft Plan is there an assessment of the likely effect of our area's rapid movement toward alternative fuel vehicles, nor the infrastructure to support residential needs for powering such vehicles with a doubling of the population in the University area. The DEIR should explain how it projects the use of alternative fueled vehicles in its climate analyses.

O15-11

***The DEIR should study the transit propensity of projected residents to determine if transit will meet its goals under the climate action plan. Further, the DEIR should study the impact of many fewer residents than projected on meeting the CAP goals.***

O15-12

P 51. S.5 – 4.12 Public Services (Issue 1)

The DEIR fails to address the total lack of additional schools in the University Community. Additional pre-school, primary and secondary schools are imperative in an area which seeks to double its residential population. Not only does the City not have land within the community on which to build additional schools but there is no infrastructure/financial plan to begin even discussing such required development. As such the lack of plans for additional schooling makes is a substantial detraction from neighborhood "livability" particularly for families residing in the area. Specific plans to mitigate this significant impact need to be developed and addressed in the DEIR.

O15-13

P 53. S.5 – 4.1 (recreation (issue 1))

The Draft Plan accounts for doubling the residential population in the University Community but lacks the ability meet that demand with adequate parks and recreational opportunities. By the City’s own calculation there is a substantial park and recreation deficit in the University community and no city property to rectify the problem. At build out, there will be a deficit of 4,100 points, the equivalent of a lack of Parks for 41,000 persons according to the Park Master Plan. Additionally, parks need to be located where people live, not in remote areas that require a car or transit ride to reach them. The DEIR also notes a need for a total of 5.7 recreational centers and 2.8 aquatic complex to meet the City standards, acknowledges that the City lacks property on which to construct such facilities or resolve the deficit. These deficits contribute to making the University Community a less “livable” section of the City. ***The DEKR should analyze the effects of a substantial park deficit, and specifically the need to analyze the specific environmental impacts to the MPHA of improper use of this land in place of missing recreational opportunities in parks.***

O15-14

P 55. S.5 – 4.14 (transportation)

The studies considered with respect to traffic data in support of the DEIR and Draft Plan are almost 10 years old and do not include conditions at high use times, nor on major thoroughfares. ***The DEIR should explain how the use of out-of-date traffic study data leads to accurate conclusions for current and future conditions.***

O15-15

P 60. S.5 – 4.18 Wildfire

Doubling the population density within the already dense University community increases wildfire risk. Permitting the construction, particularly of multi-story buildings adjacent to canyon rims and/or open spaces increases wildfire risk. The proposed City plan and the DEIR examine only issues arising after a wildfire occurs. Both fail to create realistic fire PREVENTION measures in our brush exposures including mitigation by the City, on City property, requiring hardening of exteriors of structures, and/or setback requirements and other exterior fire protective measures which should be required to mitigate some of the risk in the event of a wildfire. ***The DEIR needs to address and include specific and adequate fire protective measures.***

O15-16

P 90. 3.2.1.4

With respect to affordable housing, the draft plan anticipates the only financially feasible new housing construction will be in the higher range of "afford ability", of 81% of AMI or better. See Keyser Marston Associates Inc. March 2024 study for the City of San Diego,

O15-17

The draft plan does not study, nor address the displacement of numerous lower income households currently residing in the plan area, which housing is slated for demolition/re-development and replacement with residential units available requiring a considerably higher income. ***The UCPG Plan update subcommittee specifically requested anti-displacement***

O15-18

**measures for this group of current residents but such was not incorporated in the proposed plan nor considered in the DEIR. The DEIR should explain why this part of the housing element is omitted.**

**O15-18  
cont.**

Thus, people in the extreme low, very low- and low-income groups are essentially precluded from finding affordable homes in the University Community. It is people in those levels (individually and/or their families) who fill many of the lower paid jobs in the commercial and retail sector.... including biotech, life sciences and university jobs, who are and will be precluded from finding affordable housing in the university community.

Of the housing production needed in ALL of San Diego, according to the chart at 3.2.1.4, of the total of 63,156 new housing units needed above 81% of AMI. The city is apparently looking to place a disproportionate, almost 50% of those higher priced units (i.e. 30,480 new residential units per the draft plan) in the University community, rather than elsewhere in the City. That solution is inequitable. Not only will this elimination of lower priced housing in the UC community destroy the economic diversity of the area, but it will also have a significant NEGATIVE impact on one of the other goals of the draft plan (and which is critical to the city's infrastructure planning) .... which is to increase transit ridership and particularly use of the Blue Line Trolley. Higher income households are NOT those who typically ride public transit. More typical transit riders will be priced out of the University Community.

**O15-19**

UCPG's proposals for creating affordable housing at all levels of income within the university community; avoiding displacement of lower income households; and requiring lower income units to be provided by developers on site have not been included in the plan nor considered in the DEIR and should be.

**O15-20**

P 92. 3.3

CEQA guideline section 15124(b)(1) requires:

The description of the project shall contain the following information but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact..... "(b) A statement of the objectives sought by the proposed project. A clearly written statement of objectives will help the lead agency develop a reasonable range of alternatives to evaluate in the EIR and will aid the decision makers in preparing findings or a statement of overriding considerations, if necessary. The statement of objectives should include the underlying purpose of the project and may discuss the project benefits."

**O15-21**

As further discussed, several of the objectives/goals are not adequately considered in the Draft Plan for University. Those were specifically requested in UCPG plan update's recommendations for inclusion in the plan but were not included. Therefore, they have not been considered in the DEIR although they need to be addressed.

Services and amenities, such as retail and amenities near new residential development need to be required as they are in direct competition for commercial space with biotech and life sciences development.

O15-22

There is a substantial deficit (lack of such for 41,000 persons) in parks and recreational facilities available NEAR anticipated dense residential development that is planned, and no means to create such due to the lack of City property to construct such. This needs to be remedied

O15-23

-As discussed in response to DEIR section 3.2.1.4, the Draft Plan does not provide for" housing of all types and for all income levels in a manner that affirmatively furthers fair housing." To the contrary, the Draft Plan is inequitable. Additionally, the City's specific objective of "increasing affordable housing near biotech jobs and UCSD to retain talent with the City and prevent employees and students from leaving the community due to high housing costs" also fails other than for those with high paying jobs. ***The DEIR should explain how the impact of expected housing types projected in the Draft UC Plan may affect its analyses and conclusions (CAP, Mode Share, and transit use).***

O15-24

P 136. 3.5.3

The housing contemplated by the UC Draft Plan in the University Community is that for income levels above 81% AMI. For the most part, it is not people at those incomes who are likely riders on the Blue Line or other transit. The more likely transit riders are those who will be priced out of the housing market in the University community. ***The DEIR should analyze the impact on transit projections of the household income distribution it expects in the plan area.***

O15-25

P 136. 3.5.3. (Table 3-4)

This table demonstrates the deficiencies in the proposed UC Draft Plan with respect to education and recreation which need to be remedied. Although the Draft Plan adds 30,480 residential units there is ZERO increased development area proposed for new schools or recreation. Of equal concern is the fact that the city has no land within the University Community available for such construction. Doubling the residential community without also providing for development of schools and recreation facilities is shortsighted at best. ***The DEIR should analyze the environmental impacts of adding population without identifying additional, adequate, school locations.***

O15-26

P 137. 5.3 (Table 3-5) (Residential build out)

The UC Draft Plan and the DEIR fail to consider the fact that approximately 11,000 new "beds" have been built to house UCSD students on campus since the plan update process began more than 5 years ago and the pending Revision to the 2018 UC San Diego Long Range Development Plan, extending through 2040, will create 5,500 additional student beds with 3 projects. ***UCSD's housing development and anticipated future development needs to be analyzed in both the City's Plan for UC and in the DEIR.***

O15-27

Additionally, the DEIR fails to consider any alternative with lesser development density or to set forth different developmental components which would minimize environmental impacts. Such alternative development and plan alternatives were recommended to the City by UCPG subcommittee in its proposed changes to the draft plan dated July 11, 2023, many of which the City failed to incorporate in the currently pending Draft Plan of March 2024. The DEIR should explain why the Community Alternative Plan (Community Discussion Draft of the UC Plan, April 2023), was not analyzed as one of the Alternatives in the DEIR.

O15-28

Furthermore, the University Community is an already densely developed area in both the commercial and residential context. UCPG questions the need for the housing density set forth in the updated plan. In its grant proposal to SANDAG to undertake the plan update, the City projected the need for 10,000-30,000 new residential units. The Draft plan now envisions doubling the current population with 65,360 new residents. However, the SANDAG Series 15 forecast projected a TOTAL of 65,345 new residents in all of San Diego by 2050. Incredibly, the City's Draft Plan for UC houses the number (Per SANDAG) of ALL new residents predicted to move to San Diego by 2050 in the University community. See SANDAG Series 15 Forecast. The DEIR should explain how, environmentally, the higher-density dependent Alternatives studied would perform if only a fraction of the density is achieved under the new plan.

O15-29

<https://www.sandag.org/-/media/SANDAG/Documents/PDF/data-and-research/socioeconomics/estimates-and-forecasts/sr-15-infobits-2024-04-01.pdf>

P 139. 3.5.3.1 (vision and land use framework)

O15-30

See response to 3.2.1.4 on deficits in housing plan.

P 139. 3.5.3.1

O15-31

See response to 3.2.1.4 on deficits in housing plan.

P 139. 3.5.3.1

The Draft Plan fails to require replacement or expansion of established shopping with grocery chains, or to add new shopping centers to accommodate doubling the community population, or to provide for smaller commercial service businesses in the community which cannot afford increased rents with new development (i.e. cleaners, drug stores, single practitioner medical services, nail salons, etc.). Retail spaces are left to compete for space with high end residential and with ever expanding biotech and life science developments. ***The DEIR should analyze the environmental effects of possible diminution of retail space in key locations in the plan area.***

O15-32

P 139. 3.5.3.1

See response to 3.2.1.4

O15-33

P 140. 3.5.3.1 (affordable homes requirement)

O15-34

See 3.2.1.4

O15-34  
cont.

P 141. 3.5.3.1 (Urban Design)

Newly constructed or renovated office parks need to provide publicly accessible trails, paths, and outlooks on their property, not just “access to” or “connections with” open space land.

O15-35

P 149. 3.5.3.1 (parks and recreation)

The Draft Plan accounts for doubling the residential population in the University Community but lacks the ability meet that demand with adequate parks and recreational opportunities. By the City's own calculation there is a substantial park and recreation deficit in the University community and no city property to rectify the problem. At build out, there will be a deficit of 4,100 points, the equivalent of a lack of Parks for 41,000 persons. Additionally, parks need to be located where people live, not in remote areas that require a car or transit ride to reach them. The DEIR also notes a need for a total of 5.7 recreational centers and 2.8 aquatic complex to meet the City standards, acknowledges that the City lacks property on which to construct such facilities or resolve the deficit. ***The DEIR should analyze the impacts of Parks deficits on the plan area's significant MHPA assets; when there are inadequate Park facilities, people may (over)use Open Space parks with significant passive recreation restrictions.***

O15-36

P 156. 3.5.1.3g.(Public Facilities, Services, Safety)

The DEIR fails to address the total lack of additional schools in the University Community. Additional pre-school, primary and secondary schools are imperative in an area which seeks to double its residential population. Not only does the City not have land within the community on which to build additional schools but there is no infrastructure/financial plan to begin even discussing such required development. As such the lack of plans for additional schooling makes is a substantial detraction from neighborhood "livability" particularly for families residing in the area. The UC Plan needs to provide a clear plan for financing and implementation to assure that proposed infrastructure can be paid for and implemented as a whole (not merely block by block). ***The DEIR should analyze the environmental impacts of an increasing population without identifying additional school locations, particularly on traffic due to more students without a local school.***

O15-37

Additionally, throughout the plan, and particularly with respect to issues of infrastructure, public buildings, parks, and public services there is a complete lack of any consideration of what public funding will be required or available to implement the plan. Whereas much of the existing infrastructure and public improvements in University Community were paid for by fees charged to the initial developers in University, the Draft plan now anticipates that the residential and commercial development will DOUBLE without any assurance (and in fact, plans to the contrary) that the developer fees will be used for infrastructure, public buildings and/or services within the UC community. The UC Plan should provide a clear plan for financing and implementation to assure that proposed infrastructure can be paid for and implemented as a

O15-38

whole (not merely block by block). ***The DEIR should analyze the environmental effects of development without associated infrastructure in a worst-case scenario.***

**O15-38**  
**cont.**



**O15: Responses to the University Community Planning Group Comment Letter**

**O15-1:** The comment introduces the attached comments on the Draft Program Environmental Impact Report (PEIR). Comment noted.

**O15-2:** The increase in density associated with the High Density Alternative was assessed in comparison to the project in Section 8.2.1 of the PEIR. The summary of how this alternative compares to the proposed project is discussed in Section 8.2.3. All impact conclusions of this alternative would be the same as the project; however, the less than significant impacts related to greenhouse gas (GHG) emissions and energy would be reduced slightly under this alternative. The significant impacts related to transportation would remain significant under this alternative but would be slightly reduced because of the overall reduced regional vehicle miles traveled (VMT). The significant impacts related to air quality, noise, and aesthetics would remain significant under this alternative, but would increase slightly. The level of analysis for all of the alternatives in Chapter 8 of the PEIR is an appropriate level of analysis because the objective of the alternatives section is to provide public agencies with a range of feasible alternatives, so that they may compare the potential significant impacts of the proposed project with those of the alternative projects. Pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15126.6(d), the analysis should include a comparison of the alternative's potential impacts with those of the proposed project, but the analysis does not need to include an assessment at the same level of detail as that of the proposed project.

An analysis of the University Community Planning Group's Community Preferred Alternative has been incorporated into the Reduced Density Alternative in the Final PEIR. For a discussion on how the Community Preferred Alternative has been added to the Final PEIR, see response to comment O13-5 under comment letter O13.

**O15-3:** The University of California, San Diego's (UCSD's) Long Range Development Plan (LRDP) for the La Jolla Campus is not a part of this project as the Regents of the University of California has its own land use jurisdiction over its property and thus, is not within the jurisdiction of the City. The Regents of the University of California was the "lead agency" for the 2018 LRDP and prepared a Final EIR (SCH No. 2016111019) and approved the 2018 LRDP. However, the cumulative impacts of the proposed University CPU are discussed throughout the PEIR in individual topic sections.

**O15-4:** An analysis of the University Community Planning Group's Community Preferred Alternative has been incorporated into the Reduced Density Alternative in the Final PEIR. For a discussion on how the Community Preferred Alternative has been added to the Final PEIR, see response to comment O13-5 under comment letter O13.

**O15-5:** The Regional Forecast relies on the land use plans include community plans prepared by jurisdictions when determining the capacity for total jobs and housing. The Regional Forecast does not forecast more housing construction beyond the total amount of homes that can be built under the currently adopted community plan.

Development of the University CPU was informed by a variety of factors, including but not limited to, the Blueprint SD Initiative's Village Climate Goal Propensity Map, and the City's General Plan including housing goals and Regional Housing Needs Allocation (RHNA) in the Housing Element. The

RHNA housing targets are determined by the California Department of Housing and Community Development (HCD). As described in Section 3.2.1.4 of the PEIR, the City's target for the 2021-2029 Housing Element cycle is 108,036 housing units. These housing units must be produced in a number of income categories defined by the percentage of the area median income (AMI). The City is tasked with achieving housing production by income group as follows:

- 12,380 housing units in the Extremely Low-Income category (0-30 percent of AMI)
- 15,169 housing units in the Very Low-Income category (31-50 percent of AMI)
- 17,331 housing units in the Low-Income category (51-80 percent of AMI)
- 19,319 housing units in the Moderate-Income category (81-120 percent of AMI)
- 43,837 housing units in the Above Moderate Income category ( >121 percent of AMI)

As discussed in Section 3.5.3 of the PEIR and analyzed throughout the PEIR, buildout of the University CPU would allow for an increase of approximately 29,000 dwelling units over the adopted University Community Plan and approximately 30,480 dwelling units over existing conditions. The University CPU would help the City work towards meeting existing housing demands and achieving its RHNA targets in the Housing Element, as mandated by the State, by increasing development capacity within the CPU area through policies, rezoning, and other measures in the University CPU, in order to meet the City's housing needs as addressed in the Housing Element.

It is important to note two things. First, SANDAG regional growth forecasts relate to homes needed to address a future population, which is related but different from current housing needs which is the result of under production of homes. Second, the proposed increase in development capacity does not directly equate to the number of new homes that will actually be constructed during the life of the community plan as future housing construction is dependent on additional factors beyond the CPU associated with infill development, such as overall economic conditions, private property owner decisions, market demand, interest rates, labor and materials supply, and availability of financing. Therefore, to plan for the City's housing needs, maximizing residential capacity is critical. The proposed University CPU would also help the City address its housing needs in a way that will meet citywide goals in the City's General Plan and Climate Action Plan (CAP). See Chapter 8 of the PEIR for an analysis of potential alternatives to the project.

**O15-6:** Potential aesthetic impacts are discussed in Section 4.1.4 of the Draft PEIR. As described in the analysis, the University CPU includes policies which encourage future development to consider scenic views within the community in their project design. This includes, but is not limited to, policy 2.7F, which calls on development to consider views into and from sloping areas; policy 2.9D, which encourages maximizing views from the development to open spaces by orienting the building to the open space, and by locating common amenity areas adjacent to the public open space; and policy 5.13B, which calls for preserving the scenic qualities of the surrounding coastal and canyon viewshed areas within scenic overlooks in Rose Canyon, San Clemente Canyon, Sorrento Valley, Roselle Canyon, and the canyon area between Campus Point Drive and Towne Centre Drive.

Potential impacts to public scenic vistas would additionally be minimized through required compliance with the existing regulatory framework and the University CPU's proposed Supplemental Development Regulations (SDRs) which address building transitions and setbacks (SDRs-B.1 and C.1). Additionally, aesthetic impacts of infill projects in transit priority areas (TPA) shall not be considered significant per Section 21099(d)(1) of the California Public Resources Code. However, as

discussed in the Draft PEIR, not all future projects would be within a TPA. Therefore, in those instances, potential aesthetic impacts associated with the CPU are considered to be significant.

See also response to comment A3-5 under comment letter A3 for a discussion of how the proposed project, and future development projects, would be required to comply with the development and encroachment restrictions of the City's Multiple Species Conservation Program (MSCP) Subarea Plan (SAP) and Vernal Pool Habitat Conservation Plan (VPHCP).

**O15-7:** See response to Comment O15-6. See also response to comment A3-5 under comment letter A3 for a discussion of how the proposed project, and future development projects, would be required to comply with the development and encroachment restrictions of the City's MSCP SAP and VPHCP.

**O15-8:** Light and glare impacts are discussed in Section 4.1.4, Issue 5, of the PEIR. As described in this section, future development would be required to comply with the applicable outdoor lighting regulations of the SDMC (Section 142.0740 et seq.), which would require development to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow. Compliance with these regulations would preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. New outdoor lighting fixtures would also be required to minimize light trespass in accordance with the California Green Building Standards Code, where applicable, or otherwise would be required to direct, shield, and control light to keep it from falling onto surrounding properties.

Future development associated with the project would also be required to comply with SDMC Section 142.0730 to limit the amount of reflective material on the exterior of a building that has a light reflectivity factor greater than 30 percent to a maximum of 50 percent. Additionally, per SDMC Section 142.0730(b), reflective building materials are not permitted where it is determined that their use would contribute to potential traffic hazards, diminish the quality of riparian habitat, or reduce enjoyment of public open space. Therefore, through regulatory compliance, the project would not create substantial light or glare that would adversely affect daytime or nighttime views in the area, and impacts would be less than significant.

Additionally, future development adjacent to the City's Multi-Habitat Planning Area (MHPA) would be required to conform to the City's MSCP SAP's MHPA Land Use Adjacency Guidelines and demonstrate how lighting associated with the development would not adversely affect the MHPA through shielding and other appropriate measures.

**O15-9:** See response to comment A3-5 under comment letter A3 for a discussion of how the proposed project, and future development projects, would be required to comply with the development and encroachment restrictions of the City's MSCP SAP and VPHCP. The University CPU does not propose any future increases in development capacity within its open space areas and includes policies which encourage the preservation of identified wildlife corridors in order to reduce habitat fragmentation between canyons by requiring conformance with the MSCP guidelines such as restricted development, buffers, landscaping, and barriers (policy 5.6E).

See response to comment O15-8 for a discussion of lighting impacts in the University CPU area.

**O15-10:** See response to comment O13-2 under comment letter O13.

**O15-11:** The City assesses the significance of potential GHG impacts by determining whether the project or plan conflicts with the City's Climate Action Plan (CAP). Pursuant to the City Planning Department's June 17, 2022 memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Infrastructure Projects, the environmental analysis for plan- and policy-level documents (such as the Blueprint SD Initiative, University CPU and Hilcrest Focused Plan Amendment [FPA]) should address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP. As detailed in Section 4.7.4, Issue 2, of the PEIR, implementation of the project would be consistent with the applicable plans, policies, and regulations adopted for the purpose of reducing GHG emissions.

The City's Climate Action Plan (CAP) includes strategies for increasing the use of electric vehicles. See the discussion of these strategies in Section 4.7.4, Issue 2(d), of the PEIR. The University CPU would further achieve the strategies and goals of the CAP through the inclusion of policies which encourage the implementation or accommodation of infrastructure for electric vehicles including vehicle charging stations as part of residential, commercial, and institutional uses, and infrastructure development projects based on future demand and changes in technology (policy 3.7.a).

**O15-12:** See response to comment O15-11 for a discussion of the GHG analysis for the University CPU. The comment does not raise an issue related to the adequacy of the analysis in the PEIR. No further response is required.

**O15-13:** See response to comment O13-4 under comment letter O13.

**O15-14:** Potential impacts to recreational facilities are discussed in Section 4.13 of the PEIR. As described in Section 4.13.4, Issues 1 and 2, of the PEIR, implementation of the University CPU would require additional recreational facilities to serve the projected buildout, and impacts related to the potential increased use and associated physical deterioration of existing recreational facilities, as well as the construction of new and/or expansion of existing recreational facilities was determined to be significant at a programmatic level of analysis. As future development is proposed, individual private developments would be required to either pay citywide park Development Impact Fees or provide public parks consistent with SDMC Section 142.0640(b)(8)(A-F), as detailed in Section 4.13.2.2c. Additionally, future development within the University CPU - Community Plan Implementation Overlay Zone (CPIOZ) - Type A would be required to provide public spaces which could include recreational amenities such as a play area or a sports court with lighting (SDR-A.1) or pay a public space in-lieu fee (SDR-A.5). The University CPU also includes policies that call for the provision of parks that meet the parks standard identified in the Parks Master Plan by strategically identifying additional park and recreation opportunities as the community grows.

The environmental impact remains significant as it is unknown at this programmatic level of analysis where these future improvements would be located, the type and extent of the impacts resulting from providing these facilities, and to what extent these future facilities would be able to accommodate increases in demand for recreational facilities. Through initiatives, such as implementing the City's Parks Master Plan adopted in 2021, the City is actively seeking opportunities to sustain, connect, and expand its parks and recreational opportunities throughout the City. The University CPU also includes policies which promote the development of recreational facilities

throughout the community, such as policy 4.1C which calls for establishing an integrated public realm framework of connected sidewalks, urban pathways, trails, paseos, plazas, connections at multimodal mobility hubs, and parks like linear and pocket parks; and policy 4.1D which encourages the incorporation of publicly accessible recreation in plazas, paseos, and pocket parks within village areas, including residential, mixed-use, and employment areas on sites with visual and physical access from one or more public right-of-way frontages.

See Section 4.3 of the PEIR for a discussion of potential impacts to biological resources including the City's MHPA.

**O15-15:** See response to comment O13-2 under comment letter O13.

**O15-16:** See Section 4.18.2.3 of the Draft PEIR for a discussion of the regulations that apply to preventing wildfires through building construction, enforcement programs, brush management, etc. The Brush Management Regulations (SDMC Section 142.0412) contain information about building setbacks, including those for buildings near environmentally sensitive land uses, and the California Building Code, which is implemented in the San Diego Building Regulations (SDMC Chapter 14, Article 5, Division 1), contains restrictions on building materials in fire zones. Section 4.18.2.3 also includes a list of the General Plan policies that pertain to the prevention of wildfire, and the impact analysis under Section 4.18.4, Issue 1, of the PEIR, lists the University CPU policies that pertain to the prevention of wildfire risk.

As described in the analysis in Section 4.18.4, Issue 1, all future development that would occur under the project would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations aimed at ensuring the protection of people or structures from potential wildland fire hazards. While implementation of the City's regulatory framework at the project level would typically be sufficient to reduce potentially significant wildfire impacts, at a program level of review and in the absence of project-specific development plans, impacts would be significant for purposes of the CEQA analysis.

**O15-17:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O15-18:** The University CPU is a long-range land use plan which would increase the capacity for homes and jobs within the community plan area, but does not specify the location of nor how many housing units would be developed for each income level. Calculating the amount of housing that would be developed for each income level would be highly speculative as it would require knowledge of specific development projects in specific locations which are not and cannot be known or identified at this time. The University CPU includes policies which support the development of housing affordable to all income levels including, but not limited to, policy 1.2C which calls for facilitating the development of homes that are affordable to a range of household income levels, sizes, and tenure patterns, including families, employees, and students; and policy 1.2I which promotes the provision of additional affordable housing through new development within the University Community above the citywide requirement. The University CPU also includes SDR-J.1 which addresses housing equity and affordability by requiring that development within the University CPU CPIOZ – Type A area that includes a residential use shall satisfy the City's Inclusionary Affordable Housing Regulations (SDMC Chapter 14, Article 2, Division 13) through either the

provision of on-site affordable dwelling units or off-site affordable units within a Sustainable Development Area within the University CPU area or shall be required to pay the Inclusionary Affordable Housing In-Lieu Fee. Please also refer to SDMC Chapter 14, Article 3, Division 12 related to Dwelling Unit Protection Regulations which require replacement of dwelling units and protected dwelling units for residential development.

Furthermore, CEQA Guidelines Section 15064(e) states that “[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect.”

In the absence of substantial evidence predicated upon facts, there is no evidence that the project would result in displacement of low-income persons, resulting in physical impacts on the environment. The City has numerous plans, policies, and programs to support the development of very-low-, low-, and medium-income housing and continues to implement these plans, policies, and programs to increase housing equity and affordability throughout the City.

**O15-19:** See responses to comments O15-5 and O15-18. There is no evidence to support that all of the proposed units would be developed for households with an income level of 81 percent of AMI or higher. The City has numerous plans, policies, and programs to support the development of very-low-, low-, and medium-income housing and continues to implement these plans, policies, and programs to increase housing equity and affordability throughout the City. The comment about transit ridership is noted. The comment does not raise an issue related to the adequacy of the analysis in the PEIR.

**O15-20:** See response to comments O15-18 and O15-19. Comment noted.

**O15-21:** Comment noted. See Section 3.3 of the PEIR for a discussion of the project objectives.

**O15-22:** Comment noted. The proposed Urban Village and Community Village land uses would allow and encourage a mix of retail and residential land uses. Both Urban Villages and Urban Flex Villages would allow employment uses including scientific research uses. The Scientific Research land use designation would be used for biotechnology and life sciences development. The comment does not raise an issue related to the adequacy of the analysis in the PEIR.

**O15-23:** Comment noted. See response to comment O15-14.

**O15-24:** See response to comment O15-18. At the program level, the expected quantities of the various ranges of housing that could be provided based on the AMI rate is unknown at this time and

would be highly speculative as it would require knowledge of specific projects in specific locations which are not and cannot be known or identified. The City designations land uses as part of the community plan update process which are implemented by zoning and development regulations in the SDMC. Community plans land use designations and the associated zoning allow for housing, but do not specify the level of affordability. Community plans land use designations and the associated zoning do not exclusively identify areas for affordable housing. Likewise, the CEQA analysis looks at the land uses – residential and non-residential – to determine impacts.

The project's consistency with the City's CAP is discussed in Section 4.7.4, Issue 2, of the PEIR. As discussed in this section, the project is consistent with the City's CAP and would support the City's CAP goals, including its mode share and public transit ridership goals as it would focus future development near transit to support shifts in mode share and to encourage the use of alternative transportation modes.

**O15-25:** See response to comment O15-24

**O15-26:** Potential impacts to parks and recreational facilities are discussed in Section 4.13.4, Issues 1 and 2, and potential impacts to school facilities are discussed in Section 4.12.4, Issue 1 (c) of the Draft PEIR. See response to comment O15-14 for a discussion of park- and recreation-related impacts and response to comment O13-4 under comment letter O13 for a discussion of school-related impacts.

**O15-27:** See response to comment O15-3.

**O15-28:** An analysis of the University Community Planning Group's Community Preferred Alternative has been incorporated into the Reduced Density Alternative in the Final PEIR. See Chapter 8.0 of the PEIR for a discussion of how the various alternatives, including the Higher Density Alternative, see response to comment O13-5 under comment letter O13.

**O15-29:** See response to comment O15-5.

See Chapter 8.0 of the PEIR for a discussion of how the various alternatives, including the Higher Density Alternative and the Reduced Density Alternative, compare as it relates to the significance of potential impacts.

**O15-30:** See response to comments O15-5, O15-18, and O15-24.

**O15-31:** See response to comments O15-5, O15-18, and O15-24.

**O15-32:** The proposed University CPU would allow up to an additional approximately 16,875,000 square feet of office commercial, approximately 4,282,000 square feet of retail commercial, and approximately 1,364,000 square feet of visitor commercial space. Depending on the land use designation and zoning, these spaces could accommodate grocery stores or other community and neighborhood serving commercial businesses such as pharmacies and restaurants. As described in response to comment O15-22, the biotechnology and life science businesses would be allowed under the Scientific Research and Light Industrial land use areas. Additionally, the University CPU

contains policies to “encourage the inclusion of grocery uses as a part of commercial and mixed use development . . .” (policy 1.6B) and an SDR to maintain space for grocery uses (SDR-H.1).

Furthermore, CEQA Guidelines Section 15064(e) states that “[e]conomic and social changes resulting from a project shall not be treated as significant effects on the environment. Economic or social changes may be used, however, to determine that a physical change shall be regarded as a significant effect on the environment. Where a physical change is caused by economic or social effects of a project, the physical change may be regarded as a significant effect in the same manner as any other physical change resulting from the project. Alternatively, economic and social effects of a physical change may be used to determine that the physical change is a significant effect on the environment. If the physical change causes adverse economic or social effects on people, those adverse effects may be used as a factor in determining whether the physical change is significant. For example, if a project would cause overcrowding of a public facility and the overcrowding causes an adverse effect on people, the overcrowding would be regarded as a significant effect.”

**O15-33:** See response to comments O15-5, O15-18, and O15-24.

**O15-34:** See response to comments O15-5, O15-18, and O15-24.

**O15-35:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR.

**O15-36:** See response to comment O15-14 for a discussion of the proposed project’s potential impacts on parks and recreational facilities. Regarding the potential impacts to the MHPA, see response to comment A3-5 under comment letter A3. The areas designated as part of the City’s MHPA would be subject to the requirements of the City’s MSCP SAP and VPHCP. Additionally, as future development occurs, the City’s MSCP SAP’s MHPA Land Use Adjacency Guidelines would be addressed on a project-by-project basis to minimize direct and indirect impacts and to maintain the function of the MHPA.

**O15-37:** See response to comment O13-4 under comment letter O13 for a discussion of school-related impacts.

**O15-38:** The PEIR identifies significant impacts related to public services, recreation, and utilities and service systems. At the program level of analysis without project-specific details, the specific impacts and the extent of impacts related to the development of infrastructure cannot be assessed because the size, type, and location of these projects is not known at this time. Future public service and infrastructure projects would be required to comply with regulations in existence at the time which would reduce potential environmental impacts and would undergo project-specific environmental review, at which time environmental impacts would be identified and addressed.

See response to comment I13-3 under comment letter I13 in regard to the concern about funding future public service and infrastructure development projects.



## Comment Letter O16 - Uptown United

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] PEIR, Hillcrest Focused Plan Amendment  
**Date:** Tuesday, April 30, 2024 9:33:16 AM  
**Attachments:** [PEIR comment Hillcrest \(Uptown United\).pdf](#)

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**From:** Uptown United <[uptownunited3@gmail.com](mailto:uptownunited3@gmail.com)>  
**Sent:** Monday, April 29, 2024 11:52 PM  
**To:** [PLN\\_PlanningCEQA](mailto:planningceqa@sandiego.gov) <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Subject:** [EXTERNAL] PEIR, Hillcrest Focused Plan Amendment

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A comment letter is attached, 4 pages.

**O16-1**

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**UPTOWN UNITED  
San Diego, CA 92103**

April 29, 2024

City of San Diego  
Planning Department  
Via email: PlanningCEQA@SanDiego.gov

Re: Comment on the draft PEIR for the  
Hillcrest Focused Plan Amendment to the Uptown Community Plan

**Introduction**

The Hillcrest Focused Plan Amendment (“Hillcrest/ Uptown Plan” or “Project”) is a project which is unneeded, and never should have been initiated.

As background, the Uptown community worked for seven years on the prior Community Plan Update, from 2009 to November 2016. In the end, this was a high-density, high-growth plan, containing enough allowable development capacity for 50% more housing units and population. With the city growth rate of 0.7 per year from 2010 to 2016, the 50% growth potential was enough for 70 years.

O16-2

Upon adoption of the Uptown Community Plan Update in November 2016, the City Council expressed support for a Specific Plan which would cover six blocks in the core of Hillcrest. For unknown reasons, that plan was later changed to a far-reaching project which would completely change the Land Use plan for an area 14 times as large as the original Specific Plan.

From 2020 to the present, the residents and business owners of Uptown have been burdened with another planning process, already lasting four years.

**Deficiencies of the draft Hillcrest/ Uptown Project**

The following comments are not a comprehensive list of the serious problems with the Project. Rather, these comments address some items which haven’t been clearly identified.

O16-3

**Overall problems with the Project**

1. The project was misnamed as the Hillcrest Focused Plan Amendment. The Project area includes not just the Hillcrest neighborhood, but also the Medical Complex neighborhood and part of University Heights.

O16-4

2. The Project is a group of Community Plan Amendments which revises all elements of the Community Plan. The community-wide impacts of the Project have been detailed in a recent comment letter to the city from Lu Rehling, former board member of Uptown Planners.

O16-5

3. Recent forecasts from the California Department of Finance and SANDAG predict slow growth in the state and San Diego region until 2040, then a declining population. These forecasts are not speculative. The large cohort of Baby Boomers is ageing. Later generations are smaller in number, and have lower birth rates.

O16-6

4. The United States is approaching a stable, non-growing population, before reducing in number. Public officials in the California government, San Diego region and the City of San Diego haven't become fully aware of that trend. They haven't committed to revising all relevant plans, including mobility, Climate Action Plan, water supply, and more.

O16-7

5. Between 2022 and 2050, the San Diego region is expected to add just 65,345 in population, a growth rate of only 0.17% per year. The Uptown community currently holds about 3% of the city's population.

O16-8

6. This "fair share" of the projected growth for Uptown would be about 2000 people, about 830 housing units. Even with an assumption than Uptown should absorb more than a "fair share", the addition of 53,000 housing units in allowable development capacity, above the existing 23,000 units, is excessive, and irrational.

O16-9

7. The PEIR makes claims that the Uptown Community must accept significant harmful impacts because of the overarching need for more housing units. More rational civic leaders recommend focusing on affordability, not trying futilely to get developers to build more units. There is no basis to claims in the draft PEIR that the Uptown community must accept more than a doubling of housing units and population. The proposed increase is over 50 times a "fair share" of projected City of San Diego growth.

O16-10

### **Mobility deficiencies**

1. Adverse impacts on the transportation system have not been mitigated, because the proposed transportation system is largely speculative and infeasible. Two examples are:

O16-11

a. Public testimony has stated why the proposed streetcar on University will be infeasible. The current bus system is needed because it has multiple routes. A fixed-rail transit system won't replace the many bus routes, and it's not feasible to have a dual system of buses plus streetcars on University Ave. The City has provided no substantial evidence that a streetcar will be developed, or that it would increase ridership over the current bus system.

O16-12

b. The proposed transit line from Hillcrest to Mission Valley is merely a concept, shown as a diagonal line on a map. It is vaguely described as an overhead conveyance of some type,

O16-13

perhaps a gondola or tram. This cannot be considered serious mitigation for adding capacity for 30,000 housing units to the Uptown Community Plan.

O16-13  
cont.

c. Transportation projects planned for 2040-2050 or later are not suitable as mitigation. Since the transportation plan is phased, any increases in allowable density should be phased also.

O16-14

### **Public Facilities deficiencies**

1. When the city adopted citywide Development Impact Fees (DIF), they broke the link between Community Plans and public facilities. There is now no assurance that DIFs will be spent in the community which has the development, to offset the impacts. Also, the Public Facilities Financing Plans and Impact Fee Studies have been inactivated.

O16-15

2. Levels of service and quality of life can only decline if the Uptown community gets 10 to 25 years of new development, while still waiting for transportation improvements and other public facilities.

O16-16

3. The Project needs an important policy added: Public facilities must be provided concurrent with need.

O16-17

4. The Hillcrest/ Uptown project lacks a feasible implementation plan to provide public facilities which would be needed for a doubling of population.

O16-18

### **Alternatives – the deficiencies**

The draft PEIR fails to adequately analyze alternatives. The most serious deficiency is with the Reduced Density Alternative.

1. The Reduced Density Alternative in the PEIR is a straw man, set up in such a way to easily be cut down. The conclusions were:

O16-19

a. Impacts would be reduced for air quality and noise.

b. This alternative would not meet mode share goals to the same degree as the project. This would result in increased impacts to GHG and VMT.

c. The fallacy in the above is to plan extremely high densities in the Project, then claim that anything less is insufficient.

2. a. Another weakness of the Reduced Density Alternative is that the PEIR does not sufficiently analyze the benefits. For example, the PEIR acknowledges under "Aesthetics" that "impacts associated with scenic views and viewsheds within the Climate Smart Village areas under this alternative would be reduced compared to the project". However, that benefit is not acknowledged in the Conclusion section (page 8-52).

O16-20

b. The PEIR makes no attempt to analyze the benefits to Recreation from a reduced density. Uptown is 90% deficient in parks, according to previous city reports. Yet in a community which is seriously deficient in parks, a reduced density has a clear benefit. An amount of growth could be planned which could reasonably be served by adequate parks.

O16-21

3. Residents will find parks, whether nearby or not. A lack of parks in any area leads to more travel including more vehicle miles. In the Recreation section, page 8-49, the PEIR states that "the location and need for potential future facilities cannot be determined at this time..." Yet the previous section on Aesthetics did determine that a Reduced Density would provide reduced impacts to Climate Smart Village Areas. The PEIR should similarly seek to identify areas and ways in which the Reduced Density Alternative would avoid more deficiencies in parks, and more miles driven to access parks.

O16-22

4. City planning officials and their superiors are exhibiting a serious weakness when they proposes a doubling of the Uptown population with almost no new parks. The notion is inhuman.

O16-23

5. The Conclusions section for the Reduced Density Alternative fails to weigh the many benefits from a more reasonable plan, less than the doubling of housing units and population.

O16-24

6. The High Density Alternative for Uptown is deficient, because it fails to identify the adverse impacts from adding 1000 units to a plan which already aims to double the existing housing stock. This alternative proposed to use densities as high as 290 du/acre, without meaningful analysis of the ensuing heights, traffic congestion, etc.

O16-25

### **Environmentally Superior Alternative**

The High Density Alternative for the University and Uptown communities cannot be chosen as Environmentally Superior, because the draft PEIR explains why this alternative is "infeasible". This one deficiency by itself is sufficient to cause a rejection of the draft PEIR, followed by needed revisions.

O16-26

### **Conclusion**

The draft PEIR is seriously deficient. It must be revised and recirculated.

O16-27

Thomas G. Mullaney  
Executive Director  
Uptown United  
Email: UptownUnited3@gmail.com  
Phone: 619-889-5626

PEIR comment Hillcrest (Uptown United).pdf

**O16: Responses to Uptown United Comment Letter**

**O16-1:** The comment is an introduction to the attached comment letter. No response required.

**O16-2:** The commenter introduces the letter and provides background information for the comments. No response required.

**O16-3:** Comment noted.

**O16-4:** The comment about the Hillcrest FPA boundaries is noted. This comment does not address the adequacy of the Program Environmental Impact Report (PEIR); no response is necessary.

**O16-5:** Comment noted. The responses to Lu Rehling's comment letter can be found under comment letter I80.

**O16-6:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O16-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O16-8:** This comment is noted. See response to comment O16-9.

**O16-9:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. While no further response is necessary one is provided. As discussed in Section 3.5.3 of the PEIR and analyzed throughout the PEIR, buildout of the Uptown Community Plan as a result of the Hillcrest FPA would allow for an increase of approximately 17,218 dwelling units over the adopted Uptown Community Plan and approximately 29,635 dwelling units over existing conditions. The Hillcrest FPA would help the City work toward meeting existing housing demands and achieving its Regional Housing Needs Allocation (RHNA) targets in the General Plan Housing Element, as mandated by the State, by increasing housing capacity within the Hillcrest FPA area through policies, rezoning, and other measures in the Hillcrest FPA in order to meet the City's housing needs as addressed in the Housing Element.

It is important to note two things. First, SANDAG regional growth forecasts relate to homes needed to address a future population, which is related but different from current housing needs which is the result of under production of homes. Second, the proposed increase in development capacity does not directly equate to the number of new homes that will actually be constructed during the life of the community plan as future housing construction is dependent on additional factors beyond the FPA associated with infill development, such as overall economic conditions, private property owner decisions, market demand, interest rates, labor and materials supply, and availability of financing. Therefore, to plan for the City's housing needs, maximizing residential capacity is critical. The proposed Hillcrest FPA to the Uptown Community Plan would also help the City address its housing needs in a way that will meet Citywide goals in the City's General Plan and Climate Action Plan (CAP). See Chapter 8 of the PEIR for an analysis of potential alternatives to the project.

**O16-10:** This comment does not relate to the adequacy of the analysis in the PEIR. While no further response is necessary one is provided. The RHNA for the region is determined by the California Department of Housing and Community Development (HCD). The proposed Hillcrest FPA helps the City meet its housing needs as well as its per capita greenhouse gas (GHG) emissions goals, which are part of the City's Climate Action Plan (CAP). The proposed project does not propose site-specific development but rather provides a long-range planning framework to allow growth congruently with other development programs and incentives and in alignment with the General Plan City of Villages Strategy. The Hillcrest FPA contains goals, policies, and plans that guide housing, environmental protection, climate change adaptation, and sustainable growth. Consistent with the Blueprint SD Initiative, the Hillcrest FPA helps the City focus future growth opportunities within Climate Smart Village Areas; furthermore, it allows the City to address its CAP and its mobility mode share goals by promoting opportunities to walk/roll, bike, and ride transit.

**O16-11:** The traffic impacts of the Hillcrest FPA are discussed in Section 4.14.4 of the Draft PEIR. The vehicle miles traveled (VMT) analysis determined that impacts would remain significant after implementation of mitigation measure MM-TRANS-1.

**O16-12:** Comment noted. The feasibility of various modes of transit are outside the scope of the project and are not identified as mitigation measures in the Draft PEIR. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O16-13:** The Hillcrest FPA does not propose an aerial skyway between Hillcrest and Mission Valley. Policy MO-3.13 has been added to the Uptown Community Plan, and it reads "Coordinate with SANDAG and MTS on the feasibility of an aerial skyway connecting Hillcrest and Mission Valley." There are no plans to build this until further review is conducted, and the aerial skyway is not identified as mitigation for reducing VMT impacts in the Draft PEIR.

**O16-14:** Future development projects would occur over time and not all at once. At the time individual projects are proposed, they would be required to demonstrate compliance with the City's Mobility Choices Ordinance (San Diego Municipal Code [SDMC] Section 143.1103 et seq.) and the City's Transportation Study Manual (TSM), including preparation of a VMT analysis, where applicable (mitigation measure MM-TRANS-1). Through these requirements, individual project impacts on the transportation system can be determined in light of other transportation projects that may or may not be built at those future dates. Transportation projects are not identified as mitigation for project impacts.

**O16-15:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O16-16:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O16-17:** Comment noted. The comment requests the addition of policy language to the Hillcrest FPA and does not raise an issue related to the adequacy of the analysis in the Draft PEIR. However, Chapter 7.1 of the Uptown Community Plan addresses this concern. The City has prioritized finding solutions to bridge the gap between public service needs and funding sources.

**O16-18:** Comment noted. See response to comment O16-17. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O16-19:** The Blueprint SD Initiative Reduced Density Alternative in the PEIR has been revised to include a reduction of land use intensities for both the University CPU and Hillcrest FPA as well as for the Blueprint SD Initiative. Within the Hillcrest FPA area, this alternative would allow for reduced residential development capacity, allowing a maximum of up to 218 dwelling units per acre within the Community Commercial designation and maximum of up to 109 dwelling units per acre within the Residential Very High designation. Residential capacity within the Hillcrest FPA area under this alternative would allow approximately 14,106 new homes and non-residential capacity of approximately 1,037,600 square feet.

The level of analysis for all of the alternatives in Chapter 8 of the PEIR is an appropriate level of analysis because the objective of the alternatives section is to provide public agencies with a range of feasible alternatives, so that they may compare the potential significant impacts of the proposed project with those of the alternative projects. Pursuant to CEQA Guidelines Section 15126.6(d), the analysis should include a comparison of the alternative's potential impacts with those of the proposed project, but the analysis does not need to include an assessment at the same level of detail as that of the proposed project.

Regarding the selection of the environmentally superior alternative, please see the response to Comment I11-6 under comment letter I6.

**O16-20:** As the commenter noted, aesthetics impacts would be reduced (but not avoided) under the Reduced Density Alternative. This clarification has been added to Chapter 8.4.2 of the Final PEIR.

**O16-21:** The comparison of recreation-related impacts between the Reduced Density Alternative and the proposed project is provided in Chapter 8.4.1 (m) of the Draft PEIR. Environmental impacts related to recreational facilities would occur when project demand requires the construction of new facilities, and the building of these facilities could result in impacts. As described in Chapter 8.4.1 (m), and as noted by the commenter, recreational facility deficiencies exist throughout the City. For both the proposed project and the Reduced Density Alternative, future development in accordance with the proposed project would result in the need for improved, expanded, or new facilities. At the program-level of review, the specific requirements of new facilities is not known at this time, so this impact would be significant and similar under both the proposed project and the Reduced Density Alternative.

**O16-22:** Regarding the analysis of future park and recreation facilities, see response to comment O16-21. The VMT analysis in Chapter 4.14 of the Draft PEIR accounts for population-generated vehicle trips for residents, which would account for trips that originate at home and have various destinations, including parks and recreational facilities. As described in the City of San Diego's Transportation Study Manual, "VMT does not directly measure traffic operations but instead is a measure of network use or efficiency, especially if expressed as a function of population or employment (i.e., VMT per capita). VMT per capita represents the average amount of personal, non-commercial vehicle travel made on an average weekday by each resident. The VMT for each resident is summed up for all trip purposes or reasons throughout the day."



**O16-23:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**O16-24:** Chapter 8.4.2 of the Draft PEIR, along with Table 8-1, summarizes the general conclusions for each environmental topic. Per CEQA Guidelines Section 15126.6(d), alternatives do not need to be described at the same level of detail as the proposed project, but they should have enough detail to provide a comparison of impacts between the different scenarios. The conclusion (Chapter 8.4.2) summarizes the more detailed discussions under Chapter 8.4.1 (a-r).

**O16-25:** The increase in density of the High Density Alternative is assessed in comparison to the proposed project in Chapter 8.2.1 of the PEIR. The summary of how this alternative compares to the proposed project is discussed in Chapter 8.2.3. All impact conclusions of this alternative would be the same as the project; however, the less than significant impacts related to GHG emissions, and energy would be reduced slightly under the alternative. The significant impacts related to transportation would remain significant under this alternative but would be slightly reduced. The significant impacts related to transportation would remain significant under this alternative but would be slightly reduced. The significant impacts related to air quality, noise, and aesthetics would remain significant under this alternative, but impacts would increase slightly. The level of analysis for all of the alternatives in Chapter 8.4 of the PEIR is an appropriate level of analysis because the objective of the alternatives section is to provide public agencies with a range of feasible alternatives, so that they may differentiate the significance impact levels of the proposed project with those of the alternative projects. The analysis should include a comparison of the alternative's potential impacts with those of the proposed project, but the analysis does not need to include an assessment at the same level of detail as that of the proposed project [CEQA Guidelines 15126.6(d)].

**O16-26:** See the response to Comment I11-6 under comment letter I11.

**O16-27:** Comment noted.

## **INDIVIDUALS**

# Comment Letter I1 - Amy Ataei

From: [Ash Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
To: [Lombroso, Ari](#)  
Subject: FW: [EXTERNAL] Re: SCH No. 2021070359, Comments, Louis Rodolico  
Date: Tuesday, April 30, 2024 9:24:24 AM

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**From:** Amy Ataei <sdcondogirl@yahoo.com>  
**Sent:** Monday, April 29, 2024 4:12 PM  
**To:** Louis Rodolico <lourodolico@yahoo.com>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Re: SCH No. 2021070359, Comments, Louis Rodolico

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Bravo, Lou; well-said.

Thank you for voicing your opinion on at least a segment of the issues we are facing toward the densification of University City.

It is glaringly and grotesquely apparent the City wishes to eliminate as much single family homes and homeownership as possible, while inhibiting transportation and other infrastructural needs—a recipe for disaster. It is abundantly clear our civic leaders find financial advantage to cooperate with heavy hitters like Westfield Mall and the various developers, whose building permits are being fast-track to circumvent public opinion.

In the northern section of University City, we are being faced with a great many projects, either completed or slated, that are to the detriment of our community and those needing affordability. Being priced out is not an option, despite the opinions of those with a great deal of financial resources and special interests.

At this time, we have 3 "luxury" high rises that are not only out of scale to our environs as well as creating untoward light pollution, and the worst detriment—exceedingly high price points, the associated management companies are allowing their tenants to behave badly by way of impulsive noise-making vehicles and pet disruptions. The impending dwellings, of even taller height, will continue this horrid trend in addition to being financially inaccessible to a majority of area residents.

The only feasible and equitable way to continue with housing progression is to encourage current multi-unit property owners/operators to enhance their properties, instead of demolishing them in favour of massive towers that serve no one but the extreme wealth while displacing those presently living within. Moreover, mid-rise/quadplexes would be a far more pleasing concept, in a myriad of ways.

Respectfully Yours,  
Amy L Ataei, founder  
Quiet Our Streets Coalition  
262.573.5030

I1-1  
I1-2  
I1-3  
I1-4

On Monday, April 29, 2024, 12:00, Louis Rodolico <lourodolico@yahoo.com> wrote:

## **DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SCH No. 2021070359**

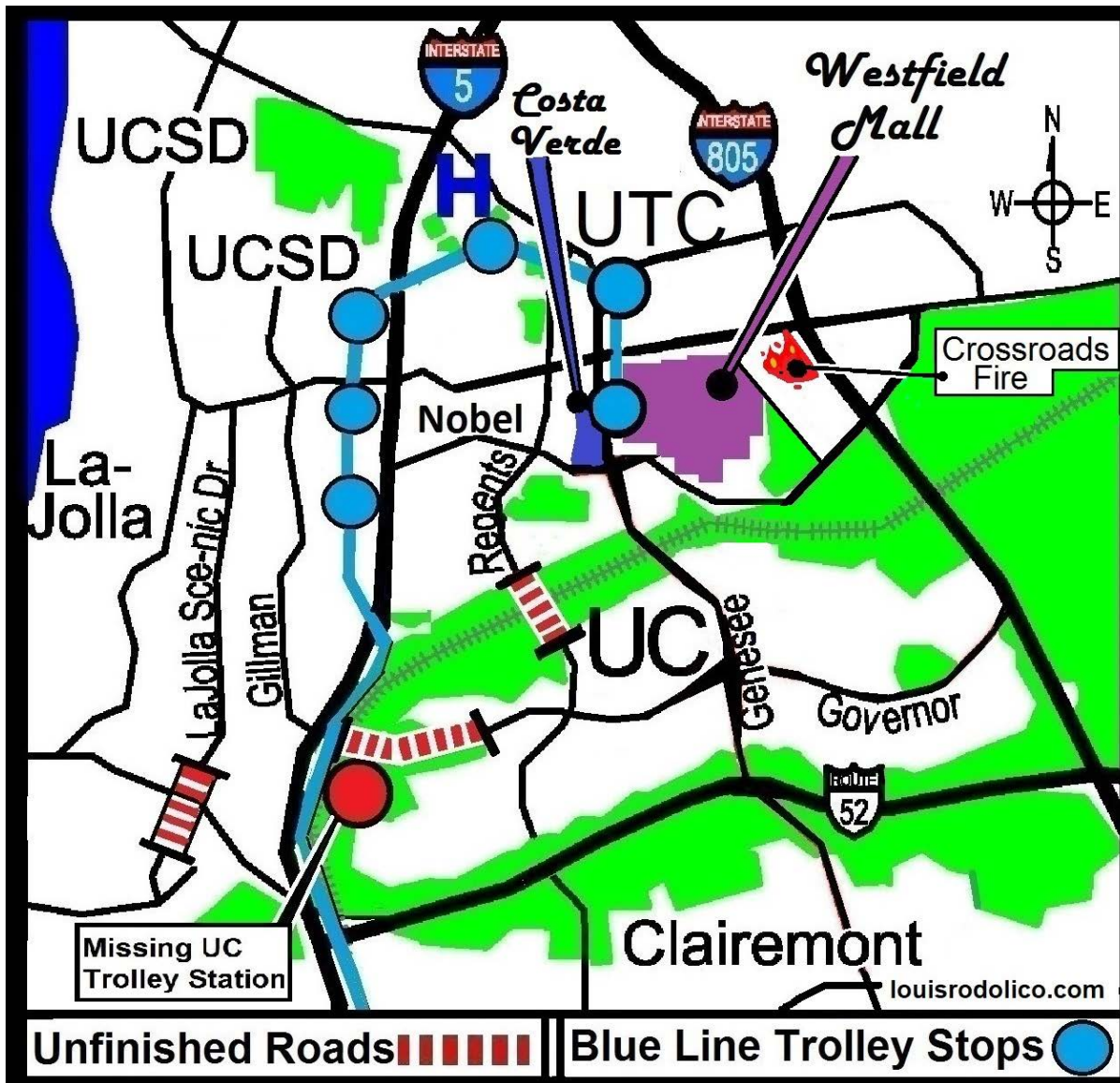
BLUEPRINT SD INITIATIVE, HILLCREST FOCUSED PLAN AMENDMENT TO THE UPTOWN COMMUNITY PLAN, AND UNIVERSITY COMMUNITY PLAN AND LOCAL COASTAL PROGRAM UPDATE

Comments: Louis Rodolico April 29, 2024

### **8.1 Project Alternative** Page 8-4 PDF Page 767

The 8.1 project alternative is the same one planning has been pushing for some time. Map PDF page 780. It makes sense to have higher density along main roads like Governor Drive, but only if those roads have been completed and can serve ambulances and conflagration egress. See map of South UC's unfinished roads:

I1-5



I1-5 cont.

Note: only one of the three originally planned roads have been completed. Knowing the overwhelming majority of the community wanted the Regents Road Bridge the Lightner Administration, in service of its clients (not us) did not want to put it on the ballot, which would have been the democratic thing to do. We wonder why democracy is in trouble it is because: shareholders, lobbyists and other special interests are successful in pushing democracy to the side.

In the bridge case a major special interest was Westfield Mall Shareholders who lost their bid in the 1960's to have their mall where 52 and Marian Bear Park are currently located. This would have been a direct pipeline to wealthy La Jolla. Still burning about it, decades later, Westfield paid a half million dollars to get control of the traffic study to remove the Regents Road Bridge. [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)

The more cars Westfield could funnel up Genesee the higher the mall rents. Westfield Operatives conveniently left ambulance service times out of the Bridge EIR. Following that tradition this Draft EIR only mentions Ambulances once with no mention of service times. Open Space is mentioned 99 times, which is completely out of balance. Also planning continues to falsely describe undeveloped land as Open Space. In University this is a de-facto cry for an arsonist/hero to come forward for projects on undeveloped land.

The "E" in CEQA stands for both the natural and human environments but planning has consistently ignored human needs in favor of fear of special interests, like the "At Large" Crossroads Arsonists and their supporters. The City is justifiably afraid of the Crossroads Arsonists. The Friends of Rose Canyon uses the Crossroads Arsonists as a cudgel to threaten the community. This is why we need things on a private government ballot so citizens cannot be intimidated by criminals. The same can be said for the ill-informed and un-studied demand that Governor Drive be reduced to two lanes. Planning should not allow itself to be intimidated, please put it on the ballot.

Allowing democracy to play its part in our city, in the past, would have given planning a complete road system in South UC and a much better argument for the higher density as outlined in 8.1.

Respectfully Submitted

Louis Rodolico

I1-6

I1-7

I1-8

I1-9

I1-10

I1-11

**I1: Responses to Amy Ataei Comment Letter**

**I1-1:** The comment introduces the forwarded email. No response is necessary.

**I1-2:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I1-3:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I1-4:** Regarding the concern about aesthetic impacts (e.g., light pollution and scale), see Section 4.1.4 (Issues 3, 4, and 5) of the Draft PEIR for a full discussion of this topic. Since the Draft PEIR addresses potential aesthetic impacts at a program level, individual project-level impacts of future development projects are unknown. Projects that require discretionary review would undergo a project-specific environmental review that could identify additional project features and/or mitigation measures to address potential aesthetic impacts.

For noise-related impacts, see the discussion in Section 4.11.4, Issue 1(b). The ambient noise levels in the University Community Plan Update area would remain significant after mitigation because, at the programmatic level of review, it cannot be ensured that all future development can demonstrate compliance due to a lack of project-specific development details. Future discretionary development projects would be required to complete environmental review and incorporate mitigation measure MM-NOI-1 and any additional mitigation measures if the future development project could result in a potentially significant noise impact.

**I1-5:** See response to comment I83-1 under comment letter I83.

**I1-6:** See response to comment I83-2 under comment letter I83.

**I1-7:** See response to comment I83-3 under comment letter I83.

**I1-8:** See response to comment I83-4 under comment letter I83.

**I1-9:** See response to comment I83-5 under comment letter I83.

**I1-10:** See response to comment I83-6 under comment letter I83.

**I1-11:** See response to comment I83-7 under comment letter I83.

## Comment Letter I2 - Nancy Back

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Hillcrest Plan Comment  
**Date:** Monday, April 22, 2024 8:41:22 AM

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-----Original Message-----

From: Nancy <nancy.back@cox.net>  
Sent: Saturday, April 20, 2024 2:22 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Subject: [EXTERNAL] Hillcrest Plan Comment

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To Whom it May Concern,

I'm writing to express my displeasure with the proposed rezoning and Plan Hillcrest proposal.

The previous changes allowing buildings higher than 3 stories has already changed the character of the community and the current proposal will make that change more drastic.

I understand the need for more housing in San Diego, however I'm not in favor of Hillcrest bearing the brunt of it.

I originally bought my condo in Hillcrest because I liked the mix of homes and 2 story condos & apartments. It was a quiet walkable community and easy to get to local businesses by car. This is no longer the case. With highrises being built to house hundreds of people who both walk and drive everyday life has become unpleasant. It's a challenge to get a parking spot at the bank, grocery store, FedEx Store. Also, there is often a line of cars in front of my garage waiting to get through a stop sign down the road which prevents me from turning left out of the garage. This is caused by not enough infrastructure to support the added cars as well as pedestrians crossing the street and ambulances mucking up traffic as they come off the freeway.

In all honesty, if I'd wanted to live in a noisy community with high rise buildings, I would have bought downtown. That is not what I want and I believe it's discriminatory to choose a community and change its character without a vote of the residents. I've paid my taxes and vote in elections I'm a retired school teacher and am not in the financial position to buy another property in a different location.

I don't believe you, the decision makers, would be happy with your civic leaders if they up a decided to change the character of your neighborhood by building high rises and adding 50,000 more residents.

I propose adding more skyscrapers downtown and not in neighborhoods.

Nancy Back

Sent from my iPhone

I2-1

I2-2

I2-3

I2-4

**I2: Responses to Nancy Back Comment Letter**

**I2-1:** The project, including the Hillcrest Focused Plan Amendment, would have significant program-level impacts related to the aesthetics of the project area. See Section 4.1.4 (Issues 3 and 4) of the Draft Program Environmental Impact Report (PEIR) for a full discussion of this topic. Since the Draft PEIR addresses potential aesthetic impacts at a program level, individual project-level impacts of future development projects are unknown. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time that could identify additional project features and/or mitigation measures to address potential aesthetic impacts.

**I2-2:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I2-3:** Traffic congestion is not considered a significant impact under the California Environmental Quality Act (CEQA). Since the passage of Senate Bill 743 in 2018, CEQA Guidelines Section 15064.3 no longer uses traffic counts, auto delays, levels of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Vehicle Miles Traveled (VMT) is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020.

**I2-4:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I3 - Linda Bauer

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Stop overdeveloping Hillcrest!  
**Date:** Monday, April 22, 2024 8:40:33 AM

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**From:** Linda <lindleeb@aol.com>  
**Sent:** Sunday, April 21, 2024 6:30 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Stop overdeveloping Hillcrest!

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Dear Planning Commission,

I have lived in and owned property in Hillcrest for more than 20 years and have seen many changes to the area during that time. The recent changes to a once thriving neighborhood have been shameful and have entirely destroyed the character of Hillcrest. No matter where one looks and on nearly every street I have witnessed once quaint properties torn down to construct high-rise apartment buildings, many without adequate parking, and concrete boxy, bunker-like smaller units that have barely no variance between properties and are hideous to look at. Additionally, so many of these new developments are so overpriced that people cannot afford the rents! What EXACTLY are we calling affordable housing - in dollars and cents? Not once have I heard an actual range of rental prices defined of dollars and cents. You are duping the public and trying to make them digest changes that we do not want.

I3-1

As Hillcrest stands now, the overdevelopment has created increased traffic, made it impossible to find parking, narrowed major thoroughfares with bike lanes barely anyone uses, and has driven away small businesses for the increase in rents, lack of parking, and unchecked homeless problem that has made our streets unsafe. Even Starbuck's moved out of the Fifth Avenue location. One barely recognizes Hillcrest now, I hate to see what it will look like once you are finished with your poorly thought-out plans. You've made this once quaint area inconvenient, stressful, and barely livable. Residents are very unhappy, but the mayor, city council, and planning commission do not seem to care one iota about the people who live here and pay taxes on your boondoggle plans.

I3-2

And Mayor Gloria is one of the biggest culprits. His pie-in-the-sky plan to make San Diego a carless city is laughable and only serves as an attempt to try to advance his own political career. This is not Amsterdam, Mr. Mayor, San Diego is a completely different city. Does he really think that people can ride busses to work to employment in North County and spend hours commuting? Or wait in dangerous bus shelters that stink with urine and feces and have been taken over by homeless drug addicts? Or ride the unreliable train and try to manage their work schedules around the train schedule? What on earth have you all been thinking? Obviously not thinking at all. And no considerable has been given what-so-ever to our senior citizens or people

I3-3



with mobility issues.

13-3

Stop Overdeveloping Hillcrest, Mission Hills, and North Park!! You've turned these areas into an unlivable, costly nightmare. I lived in New York City for five years and know first-hand the toll it takes on living in a city environment. Residents and small businesses are very unhappy and should have a real voice, not just an exercise in collecting comments that you don't listen to. San Diego has been in the deep pockets of developers for decades. This needs to stop. Shame on all of you.

13-4

Linda Bauer  
Hillcrest

**I3: Responses to Linda Bauer Comment Letter**

**I3-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I3-2:** The environmental impacts of the projected increase in traffic are discussed in Section 4.14, Transportation, of the Draft PEIR. Since the passage of Senate Bill (SB) 743 in 2018, California Environmental Quality Act (CEQA) Guidelines Section 15064.3 no longer uses auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Vehicle Miles Traveled (VMT) is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020. With the implementation of this new threshold, parking and traffic congestion concerns are issues that are not required to be studied as a part of the environmental review process. The remainder of the comment raises economic and social issues unrelated to physical changes or the adequacy of the analysis in the Draft PEIR; no further response is necessary.

**I3-3:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I3-4:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I4 - Nancy Beck

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Friday, April 26, 2024 10:51:31 AM  
**Attachments:** [~WRD0003.jpg](#)

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**From:** Nancy Beck <nancybeckrealestate@gmail.com>  
**Sent:** Thursday, April 25, 2024 7:20 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; University City Peeps <universitycitypeeps@gmail.com>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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To Whom It May Concern:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I4-1

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I4-2

I4-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR

I4-4

states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

**I4-4 cont.**

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

**I4-5**

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

**I4-6**

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts : The

City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

**I4-7**

**I4-8**

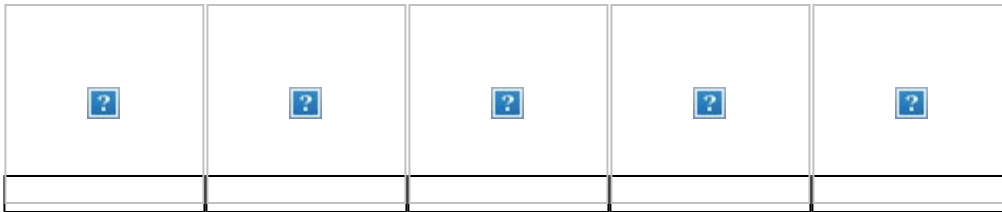
Sincerely,  
Nancy Beck  
3695 Syracuse Ct  
San Diego CA 92122

**Sincerely,**



***I APPRECIATE ALL REFERRALS!***

Email: [nancybeckrealestate@gmail.com](mailto:nancybeckrealestate@gmail.com) | Call me at [858-945-5478](tel:858-945-5478) | [NancyBeckRealtor.com](http://NancyBeckRealtor.com) / [app.realtyonegroup.com/Nancy.Beck](http://app.realtyonegroup.com/Nancy.Beck)



**I4: Responses to Nancy Beck Comment Letter**

**I4-1:** See response to comment O13-1 under comment letter O13.

**I4-2:** See response to comment O13-2 under comment letter O13.

**I4-3:** See response to comment O13-3 under comment letter O13.

**I4-4:** See response to comment O13-4 under comment letter O13.

**I4-5:** See response to comment O13-5 under comment letter O13.

**I4-6:** See response to comment O13-6 under comment letter O13.

**I4-7:** See response to comment O13-7 under comment letter O13.

**I4-8:** See response to comment O13-8 under comment letter O13.

**Comment Letter I5 - William Beck**

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on UC Plan Update  
**Date:** Friday, April 19, 2024 2:18:38 PM

---

**From:** William Beck <itsaok@aol.com>  
**Sent:** Friday, April 19, 2024 1:34 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Comments on UC Plan Update

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**To Whom It May Concern,**

**Vista La Jolla is a small community of 56 private detached homes, each owning its own land. Established in 1978, it is part of a 'super block' that includes the Westfield University Towne Centre Shopping Mall, the Westfield UTC transit hub, the Vista La Jolla Townhomes, and the Torrey Pine Apartments.**

**During the first revision of the Community Plan update, Vista La Jolla was slated for a change from residential/commercial to residential low density. However, the current plan proposes a high or medium density designation for our community. The proposed map is in the PEIR on page 3-52 (page 138 of the PDF). The Vista La Jolla neighborhood is shown as Residential Low-4 (15-29 du/acre)**

**I5-1**

**The high-density alternative is shown in figure 8-1, page 8-17, page 780 of the PEIR PDF. The Vista La Jolla neighborhood shows as high density residential (45-75 du/acre)**

**I5-2**

**As the only enclave of single-detached family homes owning its own land in North University City, Vista La Jolla deserves equitable treatment akin to the single-family homes prevalent in South University City.**

**Despite its urban surroundings, encompassed by high-rise buildings, Westfield UTC, and a few strip malls, Vista La Jolla retains its distinctive character.**

**I5-3**

**Our unique community of 56 single-family homes, complete with its own park accessible to all, should not face reclassification under the new Community Plan to high or medium density.**

**Respectfully,**

**William H. Beck**

**President of the Vista La Jolla & Renaissance La Jolla Board of Directors**

**I5: Responses to William Beck Comment Letter**

**I5-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I5-2:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I5-3:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.



## Comment Letter I6 - Judy Becker

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Final expression of resistance to Governer Drive access, egress and increased density in South UC  
**Date:** Tuesday, April 30, 2024 9:28:16 AM

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**From:** Judy Becker <ejdjbecker@gmail.com>  
**Sent:** Monday, April 29, 2024 7:31 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Final expression of resistance to Governer Drive access, egress and increased density in South UC

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To those who were elected to represent our community in South UC,

Please listen to us and be reasonable. We have work much of our lives to establish homes and invest in our community in south UC. It is a fine place to live and is open to all who would like to join us in utilizing our parks, schools and activities.

I6-1

Unfortunately, we have limitations on our transportation egress and access as we are limited and constrained by canyons both north and south of us with only a few access roads to provide evacuation in times of emergency, such as fire or earthquake. Furthermore, three schools are positioned and are are fully populated along Governor Drive without parking lots or drive through areas for off street drop off and pick up access for our children. In times of emergency and crisis such a need would result in complete thoroughfare utilization in times of emergency as things currently stand much less if Governor Drive lanes were reduced to one lane in each direction or density was increased to the degree being proposed.

I6-2

Our lives will be at stake along with those of our loved ones. Where are our representatives that are in office to look out for us?

I remember the panic I felt when the fire came down from Julian while I had two small children at home, entered our area and we needed to leave town. Not only was I in fear for my young children and my inability to run to safety while carrying them should our outlet be blocked, I also needed to provide for my elderly mother, my elderly neighbor and our pets. The memory still brings chills to my bones.

I6-3

Please open your hearts and take care of your constituents!

The level pf increased density you are proposing in our community without requiring units to

I6-4

provide adequate parking without efficient access to public transportation and reducing Governor Drive to a single lane in either direction creates a doomsday scenario for all of the great people who have made our homes here.

Please represent us and hear our pleas!

Sincerely, Judy Becker

**I6-4  
cont.**

**I6: Responses to Judy Becker Comment Letter**

**I6-1:** The comment is introductory in nature; no response is necessary.

**I6-2:** As discussed in the Draft Program Environmental Impact Report (PEIR), the major evacuation routes in the University Community Plan Update (CPU) area are Interstates 805 and 5 and State Route 52. These major evacuation routes are accessible by Regents Road, Genesee Avenue, Governor Drive, Nobel Drive, Gillman Drive/La Jolla Colony Drive, and Sorrento Valley Road. While the expansion of the two Class II bike lanes to Governor Drive and the reduction of the vehicle lanes from four to two reduces space for vehicular traffic, the full width of the existing right of way (including bike lanes) could be used for vehicular evacuation in an emergency as directed by emergency personnel. Emergency-imposed traffic routing could also redirect all traffic to drive in one direction away from a potential hazard or emergency situation. This information has been added to Section 4.8.4 Issue 5, Section 4.14.4 Issue 4(b), and Section 4.18.4 Issue 2 as clarification in the Draft PEIR. Additionally, future discretionary development projects proposed in accordance with the University CPU would be required to complete environmental review to determine potential impacts related to emergency access and to demonstrate their compliance with San Diego Fire Code.

**I6-3:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I6-4:** The environmental impacts of the projected increase in traffic are discussed in Section 4.14, Transportation, of the Draft PEIR. Since the passage of Senate Bill 743 in 2018, California Environmental Quality Act (CEQA) Guidelines Section 15064.3 no longer uses auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Vehicle Miles Traveled (VMT) is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020. With the implementation of this new threshold, parking and traffic congestion concerns are issues that are not required to be studied as a part of the environmental review process; no further response is necessary.

## Comment Letter I7 - James Binley

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: plan  
**Date:** Thursday, March 28, 2024 12:09:17 PM

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**From:** James Binley <jbinley@SDBRI.ORG>  
**Sent:** Sunday, March 17, 2024 12:25 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Sirikarn <klairungt@yahoo.com>  
**Subject:** [EXTERNAL] plan

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hi

i just wanted to chime in to say my wife and i and our son live in uc and we are all excited by the prospect of upgrading our neighborhood. to be honest both shopping centers are very dated the shops are not massively good. bringing in more people will likely improve on this so finally we might have some good restaurants. one thing that is missing is the regents road bridge which is sorely needed for traffic abatement. i know a lot of older residents dont want change but they likely dont have to deal with traffic like the working people in the community have to. i would love to know when this will get started  
sincerely

james binley

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I7-1

**17: Responses to James Binley Comment Letter**

**17-1:** The commenter states reasons why they approve of the project. The Regents Road Bridge is not included as part of the University Community Plan Update. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I8 - Celine Bonnefous

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Concerns with the Environmental Impact Report  
**Date:** Thursday, April 25, 2024 1:27:33 PM

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**From:** Celine Bonnefous <celine\_bonnefous@yahoo.com>  
**Sent:** Thursday, April 25, 2024 11:58 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Concerns with the Environmental Impact Report

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Dear Fellow San Diegan,

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I8-1

### Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I8-2

I8-3

I8-4

### Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I8-5

### New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

I8-6

### Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing

I8-7

that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Vons shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

**18-7**

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

### **Planning Deficiencies in Parks**

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not “greenways” or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

**18-8**

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

**18-9**

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

**18-10**

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

**18-11**

Celine Bonnefous from Cambridge Terrace

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**18: Responses to Celine Bonnefous Comment Letter**

**18-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted and no further response is required.

**18-2:** Comment noted. The commenter is correct in noting that transportation modeling was not completed for the High Density Alternative. This is an appropriate level of analysis because the objective of the alternatives chapter is to provide public agencies with a range of feasible alternatives so that they may differentiate the potential significant impacts of the proposed project with those of the alternatives and evaluate the comparative merits of the alternatives. The analysis should include a comparison of the alternative's potential impacts with those of the proposed project, but the analysis does not need to include an assessment at the same level of detail as that of the proposed project [CEQA Guidelines Section 15126.6(d)].

**18-3:** Since the passage of Senate Bill (SB) 743 in 2018, CEQA Guidelines Section 15064.3 no longer uses traffic counts, auto delays, levels of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant transportation impacts under CEQA. Vehicle Miles Traveled (VMT) is the metric by which transportation impacts under CEQA are measured. See Appendix J and Section 4.14 of the Draft PEIR for a discussion of the project's VMT impacts.

**18-4:** A VMT analysis was completed for the Draft PEIR in accordance with SB 743 and the CEQA Guidelines. The VMT analysis used the Series 14 Activity Based Model, which is the most recent model available from the San Diego Association of Governments (SANDAG) and which was used for the 2021 SANDAG Regional Plan. See Appendix J and Section 4.14 of the Draft PEIR for a discussion of the project's VMT impacts.

**18-5:** As discussed in Section 4.14.4 [Issue 4 (b)] of the Draft PEIR, the major evacuation routes in the University CPU area are Interstates (I-) 5 and 805 and State Route 52, which are accessible by Regents Road, Genesee Avenue, Governor Drive, Nobel Drive, Gilman Drive/La Jolla Colony Drive, and Sorrento Valley Road. The University Community Plan Update (CPU) proposes an expansion of the Class II bike lanes on Governor Drive and the reduction of the vehicle lanes from four to two; however, the full width of the existing right of way (including bike lanes) will be available for vehicular evacuation in an emergency as directed by emergency personnel. Emergency-imposed traffic routing could also redirect all traffic to drive in one direction away from a potential hazard or emergency situation. Section 4.14.4 [(Issue 4(b))] has been revised to clarify this. Additionally, future discretionary development projects proposed in accordance with the University CPU would be required to complete environmental review to determine potential impacts related to emergency access and all future ministerial and discretionary project would be required to demonstrate their compliance with San Diego Fire Code including requirements related to emergency access.

See response to comment 18-4 as it relates to the VMT analysis in the Draft PEIR.

**18-6:** Comment noted. The Complete Communities: Housing Solutions program is not a part of the scope of the project analyzed in the Draft PEIR and the environmental impacts of the Complete Communities program were addressed in Final PEIR for Complete Communities: Housing Solutions



and Mobility Choices (SCH No. 2019060003). Furthermore, projects that utilize the Complete Communities: Housing Solutions program are required to provide affordable housing pursuant to the San Diego Municipal Code (SDMC) Section 143.1015. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required. See response to comment I8-3 as it relates to traffic congestion and delay.

**I8-7:** See response to comments I8-3 and I8-4 as it relates to transportation impacts analyzed in the Draft PEIR.

The University CPU proposes to designate two shopping centers along Governor Drive (the Sprouts shopping center at Regents Road and Governor Drive; and the Vons Shopping Center at Genesee Avenue and Governor Drive) as Commercial Village Medium-3, which would allow commercial, office, and multi-family residential uses. The proposed zoning for these two areas, as shown on the University CPU's Zoning Map, would be Commercial – Community (CC)-3-8 and would allow up to a 100-foot building height.

The Vons shopping center is in a Transit Priority Area (TPA) but the Sprouts shopping center is not currently in a TPA. However, the Sprouts shopping center is accessible by transit as there is an existing bus route that runs along Governor Drive from Regents Road to Genesee Ave, as shown in Figure 3-22 of the Draft PEIR. Furthermore, the University CPU identifies micromobility hubs at both locations as potential transit improvements to be considered in future transit planning efforts (see Figure 23 of the University CPU). These micromobility hubs are locations within the urban landscape where various forms of lightweight transportation devices, typically human- or electric-powered devices which transport users at low speeds, are made available for public use to assist with the first-last mile of a commute, typically for short distance travel. These micromobility hubs will give the public an opportunity to increase their use of alternative modes of transportation and/or connect to the UTC Trolley Station. Additionally, increasing the residential and commercial density of these areas along with the proposed mobility improvements helps further achieve the City's Climate Action Plan and mobility mode share goals by encouraging transit-oriented development and by promoting opportunities to walk/roll, bike, and/or ride transit.

**I8-8:** Comment noted. This comment does not address the adequacy of the environmental analysis in the Draft PEIR. As discussed in Section 4.13.4 Issue 1(c), the University CPU identifies new parks and recreational facilities at Regents Road North and South, Governor Drive, Nobel Drive, Executive Drive, and adjacent to Torrey Pines City Park; includes Supplemental Development Regulations A.1 and A.3 which would require new development within the University CPU's Community Plan Implementation Overlay Zone to provide public spaces and associated amenities and a promenade along Executive Drive; and provides policies which support the provision of parks in the University CPU area. Developers would be required to pay Citywide Park Development Impact Fees, which could go towards the development and maintenance of parks and recreational facilities within the University CPU area or provide public parks consistent with SDMC Section 142.0640(b)(9)(A-F), as detailed in Section 4.13.2.2c of the Draft PEIR. Future discretionary development projects proposed in accordance with the University CPU would also be required to determine potential impacts to park and recreational facilities and demonstrate consistency with the University CPU and the City's Parks Master Plan policies which would support the provision of parks in the future. No further response is required.

**18-9:** The comment generally addresses overall concerns with the proposed University CPU. It does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is necessary.

**18-10:** The comment is about a previous project that is not a part of the project evaluated in the Draft PEIR. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

**18-11:** Comment noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I9 - Beau Bradford

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] RE: Proposed University City Density Change  
**Date:** Tuesday, April 30, 2024 9:18:44 AM

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**From:** beaubradford@gmail.com <beaubradford@gmail.com>  
**Sent:** Monday, April 29, 2024 11:05 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] RE: Proposed University City Density Change

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To whom it may concern.

I am a second generation San Diegan and have lived in University City for 43 years. I currently live here with my wife and we are raising my 3 year old here. I am under no illusion that everyone opposing the “expansion” of UC are the first to resist development of their communities. There is no doubt an emotional aspect to any NIMBY (Not in my back yard) changes, but I want to make sure to communicate the objective negative impacts of ALL the plans that have been presented so far.

I9-1

1. We have multiple schools in the neighborhood (4) which currently create a terrible traffic environment at dropoff and pickup. Reducing ANY lanes, or adding ANY significant amount of people will not only vastly reduce the quality of life for everyone, but it will potentially cause dangerous gridlock for emergency vehicles to enter and exit during these pickup and drop-off periods.
2. Traffic in general with reduced lanes. As the East end of UC has been developed with the 55 and up community density changes over the years, traffic has drastically increased. Even with no more expansion, coupled with reduced lanes, there will be constant traffic, and the same safety issues described above will apply.
3. In 43 years I RARELY see anyone using the already existing bike lanes, and there is no need for public transportation along Governor. Why would we need more, or dedicated bike or bus lanes along Governor? UC residents typically leave UC for recreation and entertainment. Reducing car lanes in exchange for public transport makes no sense, and just reduces quality of life.
4. The only people I see at community meetings pushing for change in UC are UCSD students and people outside of UC. Students are in school for an average of 4 years. We should not impress a reduced quality of life upon the long term residents for supposed short term convenience. I am a property manager and rent to many UCSD students. They all have cars and would not be using multiple modes of public transport to get across Rose Canyon to UCSD... They will still use cars... which will exacerbate the traffic issue if there is more housing here... Reducing EVERYONES quality of life.

I9-2

I9-3

I9-4

I9-5

Finally, and fundamentally, the vast majority of residents in UC do NOT want this. It is all of your duties, as our employees, to serve your constituency. It is not your job to impress changes that reduce quality of life and increase safety issues.

Thank you for your consideration.

---

Beau Bradford  
858-224-2328

19-6

## Comment Letter I10 Bill Breher

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Thursday, April 25, 2024 8:12:54 AM

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**From:** Bill Breher <breherbill@gmail.com>  
**Sent:** Thursday, April 25, 2024 7:50 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I10-1

I10-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I10-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the

I10-4

University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I10-4  
cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I10-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I10-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I10-7

I10-8

Sincerely,

William and Joan Breher  
3295 Welmer Place  
San Diego, CA 92122

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on the Draft Program Environmental Impact Report (DPEIR)  
**Date:** Tuesday, April 30, 2024 9:05:48 AM

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**From:** Bill Breher <breherbill@gmail.com>  
**Sent:** Sunday, April 28, 2024 9:40 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Comments on the Draft Program Environmental Impact Report (DPEIR)

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To Whom It May Concern:

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I10-9

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project.
2. The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources,

I10-10

I10-11

Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

**I10-11  
cont.**

3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.
4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn't feasible.
5. Finally, the City's conclusion that the High Density Alternative was the environmentally superior alternative isn't supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City's own conclusion states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Section 8.2.3, underline added.)

**I10-12**

**I10-13**

**I10-14**

The City should revise the DPEIR to address these issues.

Sincerely,

William Breher and Joan Breher

3295 Welmer Place

San Diego, CA 92122



**I-9: Responses to Beau Bradford Comment Letter**

**I9-1:** The commenter introduces the general concerns. No response is necessary.

**I9-2:** The environmental impacts of the projected increase in traffic are discussed in Section 4.14, Transportation, of the Draft Program Environmental Impact Report (PEIR). Since the passage of Senate Bill 743 in 2018, California Environmental Quality Act (CEQA) Guidelines Section 15064.3 no longer uses auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Vehicle Miles Traveled (VMT) is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020. With the implementation of this new threshold, parking and traffic congestion concerns are issues that are not required to be studied as a part of the environmental review process; no further response is necessary.

As discussed in Section 4.14.4 Issue 4(b) of the Draft PEIR, the major evacuation routes in the University Community Plan Update (CPU) area are Interstates 805 and 5 and State Route 52 which are accessible by Regents Road, Genesee Avenue, Governor Drive, Nobel Drive, Gilman Drive/La Jolla Colony Drive, and Sorrento Valley Road. Proposed roadway improvements would not preclude emergency vehicles from using the full width of the existing right of way (including bike lanes) in the event of an emergency. This information has been added to Section 4.8.4 Issue 5, Section 4.14.4 Issue 4(b), and Section 4.18.4 Issue 2 of the Draft PEIR as clarification. Additionally, future discretionary development projects proposed in accordance with the University CPU would be required to complete environmental review to determine potential impacts related to emergency access and to demonstrate their compliance with San Diego Fire Code.

**I9-3:** See response to comment I9-2.

**I9-4:** The proposed bicycle facility improvements on Governor Drive would implement the City's Mobility Element, Bicycle Master Plan and Climate Action Plan (CAP) policies that support enhancements to non-vehicular modes and traffic calming measures. Changes to the existing roadway design on Governor Drive are intended to calm traffic in order to make the roadway more usable for all modes, including bicycles and pedestrians. An overarching goal of the project is to further the implementation of the City's CAP and support a mode shift from single occupancy vehicles to alternative mobility options such as walking/rolling, biking, and transit. This would directly support implementation of CAP Strategy 3. Additionally, proposed General Plan policy CE-F.6 calls for encouraging and providing incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking/rolling.

**I9-5:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I9-6:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I10: Responses to William and Joan Breher Comment Letter**

**I10-1:** See response to comment O13-1 under comment letter O13.

**I10-2:** See response to comment O13-2 under comment letter O13.

**I10-3:** See response to comment O13-3 under comment letter O13.

**I10-4:** See response to comment O13-4 under comment letter O13.

**I10-5:** See response to comment O13-5 under comment letter O13.

**I10-6:** See response to comment O13-6 under comment letter O13.

**I10-7:** See response to comment O13-7 under comment letter O13.

**I10-8:** See response to comment O13-8 under comment letter O13.

**I10-9:** The commenter introduces the concerns listed in the email attachment.

**I10-10:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I10-11:** See response to comment I11-3 under comment letter I11.

**I10-12:** See the responses to comment I11-4 under comment letter I11.

**I10-13:** See response to comment I11-5 under comment letter I11.

**I10-14:** See response to comment I11-6 under comment letter I11.

## Comment Letter I11 Lisa Brenzina

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] UC COMMENTS ON THE (DPEIR)...  
**Date:** Tuesday, April 30, 2024 8:58:09 AM

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**From:** Lisa Brenzina <lrbdezine@gmail.com>  
**Sent:** Friday, April 26, 2024 3:53 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>  
**Subject:** [EXTERNAL] UC COMMENTS ON THE (DPEIR)...

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To Whom It May Concern:

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I11-1

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project.
2. The City's failure to evaluate the full environmental impacts of the

I11-2

I11-3

University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

I11-3  
cont.

3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.
4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn't feasible.
5. Finally, the City's conclusion that the High Density Alternative was the environmentally superior alternative isn't supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City's own conclusion states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Section 8.2.3, underline added.)

I11-4

I11-5

I11-6

The City should revise the DPEIR to address these issues.

It would be nice to have ANY of these issues addressed regarding the UC Community Plan. However, I'm NOT holding my breath since this whole community plan is just a protocol that you are just ignoring while you maintain your

I11-7

political stance in the pockets of these developers!!!

Lisa R Brezina

[lrbdezine@gmail.com](mailto:lrbdezine@gmail.com)

| I11-7  
cont.

**I11: Responses to Lisa Brenzina Comment Letter**

**I11-1:** The comment is an introduction to the letter. No response is required.

**I11-2:** See response to comment O13-6 and O13-7 under comment letter O13.

**I11-3:** The PEIR provides a program-level analysis of the potential impacts that could occur with implementation of the University Community Plan Update (CPU). As a programmatic document, the project description of the Draft PEIR does not provide project-level specifics but does provide feasible development buildout which is analyzed throughout the Draft PEIR. The Draft PEIR includes a discussion of environmental impacts related to aesthetics (Section 4.1), air quality (Section 4.2), biological resources (Section 4.3), greenhouse gas emissions (Section 4.7), noise (Section 4.11), public services (Section 4.12), recreation (Section 4.13), transportation (Section 4.14), and wildfire (Section 4.18). The Complete Communities program is not a part of the scope of the project analyzed in the PEIR and the environmental impacts of the Complete Communities program were addressed in Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). This comment is general in nature and does not include specific critiques of the environmental analysis; no further response is necessary.

**I11-4:** See response to comment O13-1 and O13-2 under comment letter O13.

**I11-5:** See response to comment O13-5 under comment letter O13.

**I11-6:** The selection of an environmentally superior alternative is dictated by the ability of the alternative to reduce the environmental impacts of the project and meet the project objectives. As discussed in Section 8.5 of the PEIR, the High Density Alternative and the Reduced Density Alternative would result in the same significance conclusions as the project; however, for some issues, impacts would be incrementally increased or incrementally reduced. For the Higher Density Alternative, the significance of impacts would be reduced for the issues of energy, GHG emissions, and transportation. For the Reduced Density Alternative, the significance of impacts would be reduced for the issues of aesthetics, air quality, and noise. Therefore, the High Density Alternative and Reduced Density Alternative are considered to be the environmentally superior alternatives, based on a comparison of the alternatives' overall environmental impacts. See response to comment O15-2 under comment letter O15 for additional discussion of the High Density Alternative.

**I11-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I12 - Ruth Bush

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Citizen Comments: Draft Program Environmental Impact Report (DPEIR)  
**Date:** Tuesday, April 30, 2024 9:04:07 AM

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**From:** R Bush <ruthbush@alumni.princeton.edu>  
**Sent:** Saturday, April 27, 2024 7:12 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Citizen Comments: Draft Program Environmental Impact Report (DPEIR)

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To Whom It May Concern:

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I12-1

My comments concern University Community Plan Update analysis. I support all the comments submitted by Help Save UC dated April 25, 2024.

I especially want to highlight the following concerns:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment, and the University Community Plan Update into one document made the document confusing, overwhelming, and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project.

I12-2

2. The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality,

I12-3

Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

I12-3  
cont.

3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.

I12-4

4. The DPEIR needs to be improved due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to assess the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn't feasible.

I12-5

5. Finally, the evidence doesn't support the City's conclusion that the High Density Alternative was the environmentally superior alternative. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City's own conclusion states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Section 8.2.3, underline added.)

I12-6

It is critical that the City revise the DPEIR to address these issues.

I12-7

Sincerely,

Ruth Bush

2913 Ducommun Avenue



San Diego, CA 92122

[ruthbush@alumni.princeton.edu](mailto:ruthbush@alumni.princeton.edu)

**I12: Responses to Ruth Bush Comment Letter**

**I12-1:** The comment is an introduction to the letter. No response is required.

**I12-2:** See response to comments O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I12-3:** See response to comment I11-3 under comment letter I11.

**I12-4:** See response to comment I11-4 under comment letter I11.

**I12-5:** See response to comment I11-5 under comment letter I11.

**I12-6:** See response to comment I11-6 under comment letter I11.

**I12-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I13 Tom Cartier

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments regarding UC DEIR  
**Date:** Tuesday, April 30, 2024 9:14:32 AM  
**Attachments:** [DEIR\\_Comments.docx](#)

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**From:** Tom Cartier <tomcartier@gmail.com>  
**Sent:** Monday, April 29, 2024 12:06 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Tom Cartier <tomcartier@gmail.com>; Jose Diego <juantelavera@gmail.com>  
**Subject:** [EXTERNAL] Comments regarding UC DEIR

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Dear CEQA,

There are structural flaws in the University draft environmental impact report. Below are specific items that must be addressed and changed. Please consider alternate options before the process moves forward as identified in the items listed below and summarized in the attached word document.

I13-1

**I. The City Must Reduce the Proposed Housing Density By at Least 50%** The current proposed plan will add an additional 30,480 housing units to University City's (UC) existing 26,520 units while increasing the number of residents from 64,206 to a total of 129,566, and doubling the population. This proposal is an example of very poor planning. SANDAG's current Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to the UC community alone, is ridiculous. The existing UC infrastructure will not support population increase. There is no additional land to provide more housing. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

I13-2

I13-3

I13-4

I13-5

I13-6

**II. Governor Drive must Not Be Reduced to Two Lanes.** A two lane road will restrict emergency egress in the event of a wildfire and murder thousands of residents. No changes to Governor Drive are warranted without a current Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive and emergency egress.

I13-7

I13-8

**III. The Proposed Up-zoning of the South UC Shopping Centers Must be Reduced.** The City proposed Sprouts and Vons shopping centers change to a zone to CC-3-8, with 0-73 dwelling units per acre is flawed. This zoning allows 100 foot-high structures with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The proposed plan does not consider that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly

I13-9

congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City must reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

I13-9  
cont.

**IV. Customer Parking Must be Maintained at South UC Shopping**

**Centers.** The current quantity of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU must contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

I13-10

**V. The City Needs to Find Sounder Solutions to Providing Additional**

**Recreation Centers.** University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable because it is located in La Jolla along Torrey Pines Road far away from any UC residential neighborhoods.

I13-11

**VI. A Greater Number of Solutions are Needed for Larger, Usable Park**

**Space.** The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

I13-12

**VII. The City's Argument that People will Give up their Cars for other forms of transportation is Groundless.**

No studies exist to indicate that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities because the patrons are too young and old. There are no provisions that allow emergency evacuation in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

I13-13

I13-14

San Diego's public transportation system is inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

I13-15

The City's attempt to suggest that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work is ridiculous.

I13-16

**VII. The University CPU Must Address Wildfire Evacuations & Safety.** While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent \$30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. The DEIR has no analysis of current and projected emergency response times. UC is already behind city targets to implement adequate fire and safety coverage. More than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for emergency and evacuation services, and provide fire safety infrastructure and additional vehicular egress is completed before further density is increased.

I13-17

**VIII. The University CPU Must to Take into Account UC's Vulnerability to Wildfires.** Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development. Reducing vehicular access on Governor Drive exponentially increases the risk of successful emergency evacuation.

I13-18

**IX. Housing Affordability Must Be a High Priority.** Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

I13-19

**X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements.** A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

I13-20

Sincerely,

Tom Cartier  
**UC Fire Safe Council, Treasurer**  
**Standley Community Recreation Group, Representative**  
**University City Parks Committee, Vice President**

## DEIR Flaws

There are structural flaws in the University draft environmental impact report (EIR). Below are specific items that must be addressed and changed. Please consider alternate options before the process moves forward as currently identified in the draft EIR.

**I. The City Must Reduce the Proposed Housing Density By at Least 50%** The current proposed plan will add an additional 30,480 housing units to University City's (UC) existing 26,520 units while increasing the number of residents from 64,206 to a total of 129,566, and doubling the population. This proposal is an example of very poor planning. SANDAG's current Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase the UC community alone, is ridiculous. The existing UC infrastructure will not support such a population increase. There is no additional land to provide more housing. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

**II. Governor Drive must Not Be Reduced to Two Lanes.** A two lane will restrict emergency egress in the event of a wildfire and murder thousands of residents. No changes to Governor Drive are warranted without a current Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive and emergency egress.

**III. The Proposed Up-zoning of the South UC Shopping Centers Must is Reduced.** The City proposed Sprouts and Vons shopping centers change is to zone to CC-3-8, with 0-73 dwelling units per acre. This zoning allows 100 foot-high structures with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The proposed plan does not consider that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City must reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

**IV. Customer Parking Must be Maintained at South UC Shopping Centers.** The **current** quantity of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU must contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

I13-21

**V. The City Needs to Find Sounder Solutions to Providing Additional Recreation**

**Centers.** University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable because it is located in La Jolla along Torrey Pines Road far away from any UC residential neighborhoods.

**VI. A Greater Number of Solutions are Needed for Larger, Usable Park Space.**

The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the Park Score Index.

**VII. The City's Argument that People will Give up their Cars for other forms of transportation is Groundless.**

No studies exist to indicate that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities because the patrons are too young and old. There are no provisions that allow emergency evacuation in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's attempt to suggest that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work is ridiculous.

**VII. The University CPU Must Address Wildfire Evacuations & Safety.**

While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent \$30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. The DEIR has no analysis of current and projected emergency response times. UC is already behind city targets to implement adequate fire and safety coverage. More than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for emergency and evacuation services, and provide fire safety infrastructure and additional vehicular egress is completed before further density is increased.

**VIII. The University CPU Must to Take into Account UC's Vulnerability to**

**Wildfires.** Approximately 75 percent of UC falls within a Very High Fire Hazard Severity

I13-21  
cont.

Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development. Reducing vehicular access on Governor Drive exponentially increases the risk of successful emergency evacuation.

**IX. Housing Affordability Must Be a High Priority.** Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

**X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements.** A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

Sincerely,



Tom Cartier  
UC Fire Safe Council Treasurer  
Standley Community Recreation Group Representative

I13-21  
cont.



---

**I13: Responses to Tom Cartier Comment Letter**

**I13-1:** Comment noted.

**I13-2:** The comments about the density concerns have been noted. See response to comment O11-28 under comment letter O11 and response to comment O15-5 under comment letter O15 regarding the San Diego Association of Governments Series 15 forecast and the proposed density for the University Community Plan Update (CPU).

**I13-3:** The University CPU includes policies that identify the need for funding future public service and infrastructure development projects. Plan Policy 7.1(A) iterates the City's goal "to use and seek a broad range of funding sources to finance public facilities and infrastructure, including grants and agreements with private property owners," and Plan Policy 7.3(A) highlights the City's goal to "pursue joint use opportunities, where appropriate, and subject to California Department of Education requirements and the availability of funding." Furthermore, the University CPU is a long-range planning document, and it does not include specific development projects or their details. Evaluation of and implementation of future upgrades to the City's public services and infrastructure would occur on a project-by-project basis as buildout per the project occurs. Public services impacts are discussed in Section 4.12 of the Draft Program Environmental Impact Report (PEIR), and utilities and service systems impacts are discussed in Section 4.16 of the Draft PEIR.

**I13-4:** Transportation impacts are discussed in Section 4.14, Transportation, of the Draft PEIR. Since the passage of Senate Bill (SB) 743 in 2018, California Environmental Quality Act (CEQA) Guidelines Section 15064.3 no longer uses parking, auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Vehicle Miles Traveled (VMT) is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020. With the implementation of this new threshold, parking and traffic congestion concerns are issues that are not required to be studied as a part of the environmental review process; no further response is necessary. The University CPU helps achieve the City's Climate Action Plan (CAP) Strategy 3 goals that support a mode shift from single occupancy vehicles to alternative mobility options such as walking/rolling, biking, and transit through its land use strategy and through mobility investments and programs that address travel behavior.

**I13-5:** Public services impacts are discussed in Section 4.12 of the Draft PEIR and recreation impacts are discussed in Section 4.13 of the Draft PEIR. As discussed in Section 4.12.4 of the Draft PEIR, the specific locations, sizing, and capacity of future public service development projects (e.g., schools, police and fire stations, and libraries) are not known at this time. As mentioned in response to I13-3, the University CPU includes policies that identify the need for funding future public service and infrastructure development projects. Nevertheless, the Draft PEIR determined that impacts to public services would be significant as at a program level of analysis it is unknown what specific impacts, and the extent of these impacts may occur associated with the future construction and operation of such facilities. See response to comment I13-11 regarding impacts to recreational facilities.

**I13-6:** Comment noted.

**I13-7:** See response to comment O13-3 under comment letter O13. See response to comment I13-4 above for the reason why the traffic analyses for the Draft PEIR does not address traffic congestion. A Vehicle Miles Traveled Analysis was prepared for the Draft PEIR (Appendix J).

**I13-8:** See response to comments O13-1 and O13-2 under comment letter O13.

**I13-9:** See response to comment I8-7 under comment letter I8.

**I13-10:** Comment noted. Parking is not an issue required to be addressed by CEQA; see response to comment I13-4.

**I13-11:** As described in Section 4.13.4, Issue 1 and Issue 2, of the Draft PEIR, impacts related to the need for additional recreation centers is considered significant because, at the programmatic level, implementation of the University CPU would require more recreational facilities for the future population than currently identified. As future development is proposed, individual private developments would be required to either pay Citywide Park Development Impact Fees or provide public parks consistent with the San Diego Municipal Code (SDMC) Section 142.0640(b)(8)(A-F), as detailed in Section 4.13.2.2c. Without knowing where these future improvements would be located, the type and extent of the impacts resulting from providing these facilities, and to what extent these future facilities would be able to accommodate increases in demand for recreational facilities, the environmental impact remains significant. The commenter mentions a proposed recreational facility on Torrey Pines. They perhaps mean the Scripps Shiley Sports and Fitness Center on North Torrey Pines Road. The University CPU identifies this area as a potential site for a new and/or expanded facility on Figure 26 (Figure 3-25 of the Draft PEIR). While this site is not near residential development, it could feasibly serve employees in that area, which would be consistent with University CPU plan policy 1.3(B): "Encourage office development that includes strategies accommodate changes in workforce styles and needs. Promote the locating office uses within high-quality office districts where workers have access to restaurants, services, and outdoor recreation."

**I13-12:** This comment is noted. Section 4.13.7 of the Draft PEIR identifies significant impacts related to parks and recreational facilities, as mentioned in response to comment I13-11. University CPU policy 4.1F encourages the preservation, expansion, and enhancement of existing recreation centers and aquatic facilities to increase their life span, meet current and future recreational needs, or expand their uses and sustainability. As mentioned in response to I13-3, securing funding for public services, including funding for park and recreation facilities is included as Plan Policy 7.1(A).

**I13-13:** The Blueprint SD Initiative, University CPU, and Hillcrest Focused Plan Amendment (FPA) are long-range development plans that are intended to implement the City's General Plan City of Villages Strategy, CAP, and Housing Element, among other City plans and policies, and reflect the City's latest goals, policies, and plans for housing, environmental protection, climate change adaptation, and sustainable growth. The Blueprint SD Initiative's policy and land use framework is defined by the Village Climate Goal Propensity Map, which identifies the best locations for growth and the most receptive locations that support biking, walking, and transit usage based on the Regional Travel Demand Model, to achieve the City's CAP goals related to mode share. An overarching goal of the Blueprint SD Initiative is to further the implementation of the City's CAP and support a mode shift from single occupancy vehicles to alternative mobility options such as walking/rolling, biking, and transit. The University CPU was developed to be consistent with the Blueprint SD Initiative.

Focusing on building higher-density housing in urban areas, especially those near transit hubs, would give community members the opportunity to use alternative modes of transportation. The University CPU also includes policies which support the development of housing that meets the diverse needs of the community, including families and older populations [see specifically University CPU plan policies 1.2(C), 1.2(D), 1.2(E), and 1.2(F)]. The University CPU proposes a mix of land uses that would provide not only housing but amenities for families and seniors.

A Vehicle Miles Traveled Analysis was prepared for the Draft PEIR (Appendix J).

**I13-14:** See response to comment O13-3 under comment letter O13.

**I13-15:** This comment is noted. Implementation of Blueprint SD Initiative, University CPU, and Hillcrest FPA has an overarching goal to provide affordable and convenient climate-friendly mobility options, such as walking/rolling, biking, and public transit, equitably throughout the City with a focus on areas with the greatest need. See University CPU plan policies 3.1 (A–H) for a list of policies that specifically encourage this in the University CPU area. Also, see response to comment I13-13.

**I13-16:** The comment is noted. Transit priority areas (TPA) are defined, in accordance with SB 743, as “an area within one-half mile of a major transit stop that is existing or planned.” The planned stop must be “scheduled to be completed within the planning horizon included in a Transportation Improvement Program adopted pursuant to Section 450.216 or 450.322 of Title 23 of the Code of Federal Regulations.” The proposed project does not make any changes to TPA definitions.

**I13-17:** Response times for police and fire services are discussed in Section 4.12 of the Draft PEIR. See Tables 4.12-4 for the San Diego Fire Department’s performance indicators for 2021. Table 4.12-6 includes the San Diego Police Department’s (SDPD) performance indicators for 2022. As determined in Section 4.12.4 Issue 1(a) and (b), future development in accordance with the University CPU would result in an increase in building square footage and population, which would create a greater demand for police and fire emergency services. The University CPU is a long-range planning document; it does not include specific development projects or their details. Evaluation of and implementation of future upgrades to the City’s public services would occur on a project-by-project basis as buildout per the project occurs. As the location and need for potential future facilities has not been determined at this time, the nature and extent of these impacts is unknown, and impacts related to police and fire services were determined to be significant.

See response to comment O13-3 under comment letter O13 in regard to the concern about emergency egress.

**I13-18:** As shown in Table 4.18-4 of the Draft PEIR, approximately 6,836 acres of land in the University CPU area is in a very high fire hazard severity zone. Under Section 4.18.4, Issue 1, the Draft PEIR determined that impacts related to wildfires would be significant. The University CPU includes a variety of policies that aim to reduce the risk of wildfire (see University CPU plan policies 4.2(E), 5.6(A), 7.2(A and B), and 7.10(A–D)). Emergency evacuation is discussed under Impact 4.18.4, Issue 2 of the Draft PEIR. A number of transportation corridors can serve as emergency evacuation routes in the University CPU area, including Interstate (I-) 5, I-805, and State Route (SR-) 52 which are major transportation corridors that serve the area. These are accessible from Regents Road, Genesee Avenue, Governor Drive, Nobel Drive, Gilman Drive/La Jolla Colony Drive, and Sorrento

Valley Road. The Draft PEIR identified that there is a key constraint affecting the north-south connectivity of the University CPU area; Rose Canyon and the Amtrak train tracks physically separate the northern and southern portions of the community. However, both the northern and southern portions of the community have access to other transportation corridors to the north and south of the University CPU area.

The method for responding to emergencies in the University CPU is also identified in Section 4.18.4, Issue 2. The SDPD is the lead agency for evacuations within the City. During an emergency, the SDPD identifies available and appropriate evacuation routes and coordinates evacuation traffic management with the California Department of Transportation, the California Highway Patrol, the San Diego County Sheriff's Department, other supporting agencies, and jurisdictions. Modern evacuation response includes use of early warning systems and dissemination of emergency information via radio, television, social media/internet, and Reverse 911 or Alert San Diego. The Draft PEIR found 4.18.4, Issue 2, to be a less than significant impact.

Also, see response to comment O13-3 under comment letter O13.

**I13-19:** The comment is noted. The Blueprint SD Initiative, University CPU, and Hillcrest FPA are all long-range planning documents that guide development and provide a framework for land use planning. The implementation follows the regulations of the San Diego Municipal Code, including those found in SDMC Article 2, Division 13, Inclusionary Affordable Housing Regulations. The Draft PEIR states the University CPU's affordable housing requirements in Section 3.5.3.1(a). This comment does not address the adequacy of the Draft PEIR; no further response is necessary.

**I13-20:** The comment addresses a concern about the timing of future development projects and the capacity of City's infrastructure system to accommodate new development. The Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are long-range planning documents, and they do not include specific development projects or their details. Evaluation of and implementation of future upgrades to the City's utilities system will occur on a project-by-project basis as buildout per the project occurs. Also, see response to comment O11-22 under comment letter O11.

**I13-21:** The attachment is a repeat of I13-2 through I13-19.

## Comment Letter I14 - Lori Carver

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] DEIR Comment, University City 92122  
**Date:** Tuesday, April 30, 2024 8:56:45 AM

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**From:** R & L Carver <dendensnana@gmail.com>  
**Sent:** Friday, April 26, 2024 2:38 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** CouncilMember Kent Lee <KentLee@sandiego.gov>; Graham, Nancy <NHGraham@sandiego.gov>; Alo, Leo <LAla@sandiego.gov>; zemens@sandiego.gov; vnguyen@sandiego.gov; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Mecham, Tony <tony.mecham@fire.ca.gov>; SDFD San Diego Fire Dept <SDFD@sandiego.gov>; david.fulcher@fire.ca.gov; ct.public.information.d11@dot.ca.gov; sdpdcentral@pd.sandiego.gov; clerkoftheboard@sandag.org; president@universitycitynews.org; PLN University Community Plan Update <planuniversity@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] DEIR Comment, University City 92122

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DEIR deadline 4/29/2024  
<https://www.planuniversity.org>

To: UC Planning Commission, Regarding San Diego University City~

Cutting our main artery, Governor Drive, down to one lane in each direction to add an unnecessary dedicated "buses only/bike lanes" in addition to proposed mass housing on Governor...

I14-1

**Have you tried to get to your child in a school emergency? I have**, running 4 blocks ON FOOT from my driveway, during a Granite Hills High School shooting, because there was zero vehicle access and zero cell service with News crews on the ground and helicopters in the air literally taking over all of the bandwidth, etc..!! Or, my adult child literally stuck in the fire that started in Carlsbad that took out Escondido..I was on the phone with her for 1.5 hours trying to guide her safely out, with the only safe route I could find being El Camino Real southbound. I could go on about what has gone wrong in all of my experiences here and Los Angeles; this city has been through it's fair share of catastrophes with all of the poor infrastructure to know better than to propose what you are proposing. Our first responders (copied here) already know all about trying to get to someone when their hands are tied, but **trying to get to your own child when your hands are tied is beyond everything and anything you've ever had to live through!** We had no warning!

I14-2

**Governor Drive is the only East/West artery** in the southern portion of University City. To use it for any other purpose other than a main artery borders on criminal intent for resident safety as you plan to increase housing exponentially! Your plan includes additional mass housing at Governor/Genesee along with additional mass housing at Governor/Regents to the tune of over 200 residential units per acre, with many residing multi-stories above the existing retail

I14-3

space in the plan. ADU approvals galore?! This means a potential of thousands of additional residents utilizing Governor Drive; I can't and won't unsee the RISK that restricting lanes will impose on a daily basis.

I14-3  
cont.

UC South has minor children in three public schools, and many daycare facilities surrounding Governor Drive to evacuate, thousands of current residents, many of whom are elderly with mobility issues, in addition to the thousands more you plan to add to our small neighborhood is of critical concern. Brush, canyons, eucalyptus trees, and Rose Canyon fault lines surround us making us susceptible to catastrophic events. We all have huge homeowners policy premiums due to the potential RISK here!

I14-4

Not only have I witnessed the entire county of San Diego burn twice (which was technically two of three times this has happened here)...., but I am originally from Northridge California (Porter Ranch, 91326, homeowner 1965-current). I have lived it all - multiple fires, earthquakes, emergency evacuations, emergency vehicle access, power outages, water outages, news reporter nightmares, water trucks, limited-zero access to our homes or any resources, our police station burned to the ground in the 1971 earthquake (I've donated an entire new cot room to the LAPD Devonshire Division recently, now that I am able to do so, due to the lifelong memory of that horrible time in our lives. I will never forget it.). Many are going to avoid driving in that well-marked "buses only" lane in an emergency, that is if we can make it onto Governor Drive in our vehicles while parents, first responders, and news vans try desperately to get in. I have spent 15 years of my career working in private and public insurance and college Risk Management because of all I have witnessed since 1971.

I14-5

I have already voiced my concerns over the entire University City plan (3/20/23 email). Our community colleges are out in the communities they serve for a reason, ACCESS. In addition, a vast majority of college classes are online/hybrid now and do not command an onsite presence or need for additional housing to accommodate incoming businesses, students, or staff. Proposed census projections are for a marked decrease in the San Diego population! UCSD should be required to research and open satellite campuses throughout San Diego so that their students can live, work and take UCSD classes in their own neighborhoods..not the other way around. Perhaps an educational **cohort with SDCCD and SDSU, to accommodate their students by combining class locations and utilizing empty buildings and classrooms already available throughout the county, SDCCD does it all day, everyday.** There is far too much waste in California coupled with threats over "demands on water and power," so you say, to continue funding and permitting more projects requiring more. We all know there are plenty of vacant, starving commercial spaces to hold classes and run businesses throughout San Diego so that commuting for all who live in this county should be a non-issue. I am not focusing on your entire UC plan in this communication; however, I will advocate for safety all day long. We are entitled to our safety. Proposed mass housing in all of UC, including Governor Drive, while narrowing Governor Drive to one lane in both directions, should clearly be deleted.

I14-6

I14-7

***Have you tried to get to your child during an emergency? Have You!?***

I14-8

Thank you,  
Lori Carver  
92122 Homeowner

cc: SD Fire, Cal Fire, CalTrans, SDPD Central, Clerk of the Board at SanDag

***(I apologize if this has been copied to mailboxes that are no longer correct as I copy those I've emailed before on this subject).  
SDPD, SDFIRE, CALFIRE, Caltrans, etc: This plan is clearly a Downtown 2.0 that council members and planners propose for 92122 with mass housing. I was unsure of who to direct content to at the municipalities, but felt it was important to realize the potential impact this will have due to the proposed over-development and overcrowding in all of 92122 and on Governor Drive (link to proposal is above, if you've not been made aware of this council plan)..This plan, especially for UC South, surrounding Governor Drive, makes no economic/feasibility/safety sense as this council attempts to cater to UCSD, add more growth without resources, and above all..create their "Downtown San Diego 2.0.' Our deadline to respond to [planuniversity@sandiego.gov](mailto:planuniversity@sandiego.gov) is 4/29/24. Please join in on the meetings. Thank you!***

**I14: Responses to Lori Carver Comment Letter**

**I14- 1:** The general concerns about the changes to Governor Drive and the proposed increase in housing along Governor Drive have been noted. See the response to comment I14-3.

**I14-2:** Comment noted. The comment does not raise an issue related to the adequacy of the environmental analysis of the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I14-3:** See response to comment I8-7 under comment letter I8.

**I14-4:** See response to comment O13-3 under comment letter O13.

**I14-5:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I14-6:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I14-7:** See the response to comment I14-3.

**I14-8:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.



## Comment Letter I15 - Kathy Chevalier

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] UC  
**Date:** Tuesday, April 30, 2024 9:07:27 AM

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**From:** Kathy Chevalier <kchevali@gmail.com>  
**Sent:** Sunday, April 28, 2024 11:56 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>  
**Subject:** [EXTERNAL] UC

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To Whom It May Concern: Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic

I15-1

I15-2

I15-3

I15-4

I15-5

requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative. V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update. VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts : The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program. Name Kathy and Chuck Oliver Address 5468 Pire Ave 92122

**I15-5  
cont.**

**I15-6**

**I15-7**

**I15-8**

**I15: Responses to Kathy and Chuck Chevalier Comment Letter**

**I15-1:** See response to comment O13-1 under comment letter O13.

**I15-2:** See response to comment O13-2 under comment letter O13.

**I15-3:** See response to comment O13-3 under comment letter O13.

**I15-4:** See response to comment O13-4 under comment letter O13.

**I15-5:** See response to comment O13-5 under comment letter O13.

**I15-6:** See response to comment O13-6 under comment letter O13.

**I15-7:** See response to comment O13-7 under comment letter O13.

**I15-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I16 - Hannah Chou

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Hillcrest Focused Plan Amendment - Extend One-Way Bike Configuration on University Ave  
**Date:** Tuesday, April 30, 2024 9:31:51 AM

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**From:** Hannah Chou <hannahjchou@gmail.com>  
**Sent:** Monday, April 29, 2024 11:14 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; PLN Hillcrest Focused Amendment <planhillcrest@sandiego.gov>; Darsey, Ryan <RDarsey@sandiego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@sandiego.gov>; Latchford, Jordan <JLatchford@sandiego.gov>  
**Subject:** [EXTERNAL] Hillcrest Focused Plan Amendment - Extend One-Way Bike Configuration on University Ave

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Hello, my name is Hannah and I live in the Mission Hills neighborhood. I am emailing about the importance of revising safe, all ages and abilities bike infrastructure on West University Avenue.

I16-1

The Hillcrest Focused Plan Amendment leaves a crucial gap in the regional bikeway network on West University Avenue. With high vehicle volumes posing safety risks, especially near an elementary school, urgent action is needed. **My husband and I support the one-way configuration from First Avenue to Washington Street, creating space for a protected bikeway.** This revision ensures safe mobility for all users and closes the gap in the complete streets network.

I16-2

We personally bike around town for the majority of our chores, support local businesses, and to see friends all around San Diego's many neighborhoods. The University Ave bicycle infrastructure is often the most dangerous part of our route and we have personally been a part of or witnessed instances of conflict and confusion between car drivers and bicyclists due to the design. By investing protected bikeways all the way from First Ave to Washington, it would help connect many areas of businesses and transportation from the Washington trolley, International Row, Mission Hills businesses, and Hillcrest businesses.

I16-3

Best,  
Hannah

**I16: Responses to Hannah Chou Comment Letter**

**I16-1:** The comment introduces the commenter's general concern with the proposed bike infrastructure of the Hillcrest Focused Plan Amendment area.

**I16-2:** The comment on the gap in bike infrastructure has been noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I16-3:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I17 - Lisa Clark

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to Revised University Community Plan Update  
**Date:** Tuesday, April 30, 2024 9:16:21 AM

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**From:** Lisa Clark <lisaclark101@sbcglobal.net>  
**Sent:** Monday, April 29, 2024 9:16 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Comments to Revised University Community Plan Update

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To Whom It May Concern:

We are writing to you as residents and community activists, specifically as the founders of People for a Clean UC, to express our strong opposition to certain aspects of the proposed University City Plan Update. I17-1

First and foremost, we are deeply concerned about the proposed rezoning of the areas currently occupied by the Sprouts and Vons shopping centers to CC3-8 zoning, which allows for 0-73 dwelling units per acre. This increase in density will dramatically alter the character of our community, potentially straining local infrastructure, increasing traffic, and reducing the overall quality of life for all residents. I17-2

Additionally, we are opposed to the plans to reduce Governor Drive to one lane in each direction to accommodate new bike lanes. While we support efforts to promote alternative transportation options, this particular change is likely to cause significant traffic congestion. The impact on our ability to efficiently and safely exit and return to our community cannot be overstated, and we fear that it will only worsen with the proposed increase in local population density. I17-3

While we are opposed, we do encourage looking into other alternatives to accommodate a bike lane. The segment of Governor Dr between Stadium St and Genesee Ave spans Spreckels Elementary and Standley Middle has a 6 foot sidewalk. On the other side of the street is a sidewalk with a parking strip. Why not investigate a protected bike lane on both sides of Governor Dr? This would still allow parallel parking and 4 lanes of traffic. It might even make parents feel safer allowing their kids to bike to school instead of being dropped off. I17-4

These proposed changes threaten to transform University City from the pleasant and manageable community we know and love into an area marked by overcrowding and constant traffic issues, making it an extremely unpleasant place to live. I17-5

We urge you to reconsider these aspects of the University City Plan Update and work towards solutions that maintain the integrity and livability of our community. Thank you for taking the time to consider our concerns. I17-6

Sincerely,  
Lisa Clark

**I17: Responses to Lisa Clark Comment Letter**

**I17-1:** The comment introduces the email. No response is necessary.

**I17-2:** See response to comment I8-7 under comment letter I8 in regard to the concern about rezoning two shopping centers along Governor Drive (the Sprouts shopping center at Regents Road and Governor Drive and the Vons Shopping Center at Genesee Avenue and Governor Drive).

Aesthetic impacts are discussed in Section 4.1.4, Issues 3 and 4 of the Draft Program Environmental Impact Report (PEIR). As described in this analysis, aesthetic impacts of infill projects in transit priority areas (TPA) shall not be considered significant per Section 21099(d)(1) of the California Public Resources Code. The Sprouts shopping center is not currently in a TPA, but the Vons shopping center is in a TPA. Because not all future development in accordance with the University Community Plan Update would be in TPAs, in those instances, the Draft PEIR determined that aesthetic impacts would be significant. Future projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which could identify additional project features and/or mitigation measures to address potential site-specific project level impacts.

See response to comment I13-3 under comment letter I13 in regard to the concern about infrastructure.

Transportation impacts are discussed in Section 4.14, Transportation, of the Draft PEIR. Also, see response to comments O13-1 and O13-2 under comment letter O13. Since the passage of Senate Bill 743 in 2018, California Environmental Quality Act (CEQA) Guidelines Section 15064.3 no longer uses parking, auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Vehicle Miles Traveled (VMT) is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020. With the implementation of this new threshold, parking and traffic congestion concerns are issues that are not required to be studied as a part of the environmental review process.

**I17-3:** As mentioned in the response to I17-2, traffic congestion is not used as a significance threshold under CEQA. See response to comment O13-1 under comment letter O13 regarding the proposed changes to Governor Drive. Also, see response to comment O13-3 in regard to the concern about emergency egress along Governor Drive.

**I17-4:** This suggestion is noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I17-5:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I17-6:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I18 - Jonathan Cohen

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Blueprint SD - Comment on draft PEIR for Blueprint SD (April 2024)  
**Date:** Tuesday, April 30, 2024 9:33:04 AM  
**Attachments:** [Comment on draft PEIR for Blueprint SD \(April 2024\).pdf](#)

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**From:** Jonathan Cohen <[jonathan@jonathancohen.net](mailto:jonathan@jonathancohen.net)>  
**Sent:** Monday, April 29, 2024 11:51 PM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Subject:** [EXTERNAL] Blueprint SD - Comment on draft PEIR for Blueprint SD (April 2024)

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Comment on draft Program Environmental Impact Report (PEIR)

PEIR addresses multiple projects: General Plan update, University plan update, Uptown plan update for the Hillcrest area, Local Coastal Program update, zoning update, etc. (SCH No. 2021070359)

Jonathan Cohen / April 2024

Comment

Project scope

The PEIR addresses multiple projects at once. The resulting set of documents is more than 1000 pages. Please re-consider whether the draft PEIR is consistent with CEQA writing guidelines such as page limits and plain writing. (See generally Cal. Code Regs., tit. 14, §§ 15140-15150.)

I18-1

EIR type

The State CEQA Guidelines describe several different types of environmental documents that may be prepared to fulfill the requirements of CEQA. (Cal. Code Regs., tit. 14, §§ 15168 (Program EIR), 15175 (Master EIR).) The State CEQA Guidelines specifically suggest a MEIR for a general plan update. Please re-consider whether the document should be a master EIR (MEIR) or a program EIR (PEIR).

I18-2

Zoning

The project title does not mention that the project includes zoning updates. The draft PEIR does not clearly explain which areas of land would be rezoned, and the potential effects of the rezoning in each area.

I18-3

Height limit (30-feet)

In 1972, voters approved a 30-foot height limit for some areas west of the Interstate 5 freeway (Proposition D). As written, the University plan draft states that the 30-foot coastal height limit is related to coastal views. This alone may be misleading and inconsistent with prior interpretations of the City Manager and the California Coastal Commission.

I18-4

Trolley projects

Should the PEIR address plans for the expansion of the trolley system in the University area? (Purple Line trolley)

I18-5

Scenic Highway program

The draft PEIR states that the University project area is not eligible for designation as an official scenic highway. Please contact Caltrans and review the existing eligibility designations for Interstate 5.

I18-6

Architecture and art installations

Has the draft PEIR sufficiently considered the use of architecture and art installations for visual screening and aesthetic mitigation? What will the reporting/monitoring program require?

I18-7

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**I18: Responses to Jonathan Cohen Comment Letter**

**I18-1:** See response to Comment O-13-6 under comment letter O13.

**I18-2:** As described in California Environmental Quality Act (CEQA) Guidelines Section 15168, a Program Environmental Impact Report (PEIR) is an Environmental Impact Report (EIR) which may be prepared on a series of actions that can be characterized as one large project and are related either: geographically; a logical parts in the chain of contemplated actions; in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effect which can be mitigated in similar ways. The Blueprint SD Initiative, University Community Plan Update (CPU), and Hillcrest Focused Plan Amendment (FPA) includes comprehensive updates to long-range planning documents that provide a policy framework for land use decisions within the City. Thus, a PEIR is an appropriate environmental document for the proposed project. Although a Master EIR could also be prepared, Master EIRs have more restrictive requirements for subsequent projects. Specifically, a Master EIR's project description must describe specific details of future development projects that would subsequently occur (Public Resource Code Section 21157(b)). These details (e.g., size, type, and location of future development projects) are not specifically known at this time. Further, pursuant to CEQA Guidelines Section 15179(a), a certified Master EIR shall not be used for subsequent projects when the Master EIR was certified more than five years prior to the filing of an application for a subsequent project. Thus, a Master EIR would be inadequate to support the project's objective of providing a policy and land use framework for residential capacity to meet the City's Regional Housing Needs Allocation targets over the next 20 to 30 years; and would not support the project objective of streamlining the environmental review process for future planning documents to allow for expedited implementation of plans that facilitate the development of housing and infrastructure that meets the City's needs and furthers the City's Climate Action Plan goals.

**I18-3:** The proposed Hillcrest FPA zoning map is shown in Figure 3-9 of the PEIR. The proposed zoning for University CPU can be found at the following link:  
<https://www.planuniversity.org/materials>.

As described in Sections 3.6.2 and 3.6.3, the adoption of the Hillcrest FPA and University CPU would require adoption of an ordinance to rezone land within the Uptown Community Plan area consistent with the Hillcrest FPA, and adoption of an ordinance to rezone land within the University CPU area consistent with the University CPU. The potential environmental impacts associated with implementation of the Hillcrest FPA and University CPU, and their associated zoning updates, is analyzed throughout the PEIR.

The Blueprint SD Initiative proposes an updated policy and land use framework that would apply to all development citywide and is intended to guide future land use plan updates (e.g., CPUs, Specific Plans, and FPAs) and future San Diego Municipal Code amendments which would help facilitate the implementation of the Blueprint SD Initiative. The Blueprint SD Initiative does not identify specific land use or zoning; rather, it is anticipated that future community plans and other applicable land use plans and policies would refine the General Plan's citywide policies and provide site-specific land use designations, zoning, policies, and recommendations. The Draft PEIR disclosed that the Blueprint SD Initiative's policy and land use framework would apply citywide and potential impacts

associated with the implementation of the Blueprint SD Initiative were analyzed throughout the PEIR.

**I18-4:** Comment noted. This comment is on the University CPU and does not raise an issue with the adequacy of the analysis in the Draft PEIR. No further response is required.

**I18-5:** Transportation impacts are discussed in Chapter 4.14 of the PEIR. Traffic modeling for projected vehicle miles traveled relies on the proposed project land uses and San Diego Association of Governments (SANDAG's) Regional Plan network, which currently includes the Purple line. The final route and stations for the Purple line have not been determined and are currently being studied by SANDAG. Implementation of the Purple line is not a part of the project which was analyzed in the Draft PEIR, however, a reference to it has been added to Section 4.14.4, Issue 1.

**I18-6:** Section 4.1.2.1(a) of the Draft PEIR indicates that Interstate 5 (I-5) is an eligible scenic highway from the US-Mexico border to State Route 75 (SR-75) and then from SR-75 to the northern border of the City. This latter portion travels past the University CPU area. The commenter is correct that this information is not included in the analysis in Section 4.1.4, Issue 2. The Final PEIR has been revised to update this information.

**I18-7:** The use of architectural design to encourage cohesiveness in new development is implemented as supplemental design regulations (SDRs), project design features, or objective design standards. As described in Chapter 4.1.4, Issue 3, the proposed University CPU provides urban design policies and SDRs that would be applied to projects within those project areas (see the example SDRs in the appendices to the University CPU). Chapter 4.1.4, Issue 3 has been revised to include additional information regarding the SDRs. Adherence to the regulatory and policy framework in the University CPU would provide for cohesive design themes, visual elements, and development patterns on a communitywide basis as the plan areas are built out.

The University CPU also includes Policy 2.2(B) which supports the accentuation of key focal points, entrances, gateways, and corners of a development with enhanced paving, art, signs, lighting, specimen trees and accent native drought resistant plant materials; Policy 2.3(C) which supports the encouragement of buildings to be oriented around community gathering areas such as an outdoor café, community garden, park, plaza, art installation, etc.; Policy 2.12(A) which supports the use of art installations and cultural amenities as key features of buildings, common areas, and open space areas of a project; Policy 2.12(B) which supports collaborating with local artists, residents and community members during the design and construction of projects to integrate art in the development projects; Policy 2.12(C) which supports the installation of art at critical "gateway" intersections in the community to serve as an expression of community identity and pride; and Policy 2.12(D) which supports including opportunities for street art installation and murals, especially around transit stops and key intersections. Additionally, the University addresses the transition between existing and new buildings with plan Policy 2.5(C) which promotes stepping back upper levels of buildings in areas where building heights vary to transition to adjacent lower building heights; and encourage incorporating architectural elements into building design that smooth the transition between the new and existing architecture.

As discussed in Section 4.1.4, Issue 3, compliance with City's regulations, development standards, urban design policies, and any SDRs proposed would reduce potential aesthetic impacts.

Nevertheless, at a program level of review, and without project-specific development plans and potential deviations, aesthetic impacts were found to be significant. Additional project features and/or mitigation measures may be identified at the project-level to reduce potential aesthetic impacts.

## Comment Letter I19 - Kendra Cole

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments: Community Plan and the EIR for University City  
**Date:** Friday, April 26, 2024 10:52:13 AM

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**From:** Kendra Cole <kendra\_cole2000@yahoo.com>  
**Sent:** Friday, April 26, 2024 9:34 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Comments: Community Plan and the EIR for University City

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To Whom It May Concern:

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I19-1

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant

I19-2

environmental effect of a project.

2. The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.
3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.
4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn't feasible.
5. Finally, the City's conclusion that the High Density Alternative was the environmentally superior alternative isn't supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City's own conclusion states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Section 8.2.3, underline added.)

I19-2  
cont.

I19-3

I19-4

I19-5

I19-6

The City should revise the DPEIR to address these issues.

| 119-7

Thank you,  
Kendra Cole  
University City Resident

**I19: Responses to Kendra Cole Comment Letter**

**I19-1:** The comment is an introduction to the letter. No response is required.

**I19-2:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I19-3:** See response to comment I11-3 under comment letter I11.

**I19-4:** See response to comment I11-4 under comment letter I11.

**I19-5:** See response to comment I11-5 under comment letter I11.

**I19-6:** See response to comment I11-6 under comment letter I11.

**I19-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.



## Comment Letter I20 - Carmella Cotta

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University City Environmental Report  
**Date:** Tuesday, April 30, 2024 9:07:47 AM  
**Attachments:** [UTC Resident letter to UTC Board 4 2024.pdf](#)

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**From:** Carmella George <carmella.george@yahoo.com>  
**Sent:** Sunday, April 28, 2024 12:13 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] University City Environmental Report

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To Whom It May Concern:

Please see the attached with regard to the Environmental Impact Report for University City.  
Thanks for your consideration.

Carmella George Cotta-Owner  
La Jolla City Club since 1989

I20-1

To Whom It may Concern:

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I20-2

**Governor Drive Lane Reductions**

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I20-3

I20-4

I20-5

**Emergency Ingress/Egress**

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I20-6

**New High-Rise Apartments Planned for Genesee and Nobel Drive**

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

I20-7

**Vons & Sprouts Centers New Height and Sharply Higher Density Allowances**

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

I20-8

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout’s shopping plaza. The Sprout’s shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

I20-8  
cont.

### Planning Deficiencies in Parks

Under the City’s ‘Master Plan’, the UC area is already short on publicly accessible parks – not “greenways” or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

I20-9

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents’ input, and intentionally erodes single-family neighborhoods.

I20-10

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

I20-11

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

I20-12

Carmella Cotta

La Jolla City Club

April 28, 2024

**I20: Responses to Carmella Cotta Comment Letter**

**I20-1:** The comment introduces the commenter's email attachment. The comment has been noted and no further response is required.

**I20-2:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted and no further response is required.

**I20-3:** See response to comment I8-2 under comment letter I8.

**I20-4:** See response to comment I8-3 under comment letter I8.

**I20-5:** See response to comment I8-4 under comment letter I8.

**I20-6:** See response to comment I8-5 under comment letter I8.

**I20-7:** See response to comment I8-6 under comment letter I8.

**I20-8:** See response to comment I8-7 under comment letter I8.

**I20-9:** See response to comment I8-8 under comment letter I8.

**I20-10:** The comment generally addresses overall concerns with the proposed University Community Plan Update. It does not address the adequacy of the environmental analysis in the Draft PEIR. The concerns have been noted; no further response is necessary.

**I20-11:** The comment is about a previous project that is not a part of the project evaluated in the Draft PEIR. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

**I20-12:** The comment has been noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I21 - Sandra Cox

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Leave our peaceful community alone  
**Date:** Tuesday, April 30, 2024 9:14:53 AM

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-----Original Message-----

From: Sandra Suyeyasucox <sandyscox619@icloud.com>  
Sent: Monday, April 29, 2024 7:51 AM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Subject: [EXTERNAL] Leave our peaceful community alone

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To whom makes decisions-

I have been living here for over 40 years. What your plans are doing doesn't make any sense. We have limited amounts of land which is full to capacity. You want to take away roads and add more housing??? How much sense does that make- dangerous for our community just getting in and out of University City- schools- what does that do for an already crowded drop off and pickup of kids. I avoid going out after 3pm due to so many cars on Governor. Kids aren't using bikes due to safety which is the way this world is going - sad kids can't walk by themselves. Which brings another problem- parking for all these parents that spill into other neighborhoods near the schools. We are not a large community- to accommodate more people you need more roads not less. Does that make sense you are adding housing/people and take away less roads??? Why are you all ruining University City?? You should take as much time as the people here in University City to really look at the impact this will do!!! Do your job - we pay your salaries. So far you haven't answered all of our questions or given any logical answers as how this will improve University City. It only looks like it will be worse for everyone living here. Give us a pro and con document for the changes you all want to do. It's the least you can do- do any of you live here in our community??? I think the answer is "NO".

I21-1

Wake- up and come out to see what your changes will do - less roads and more people- does that make sense???  
How safe is that for us ???

Sincerely a concerned owner.

Sandra Cox  
Sent from my iPhone

**I21: Responses to Sandra Cox Comment Letter**

**I21-1:** The comment includes general concerns about the proposed University Community Plan Update project such as the proposed increase in housing and the proposed changes to the mobility network. See response to comment O15-5 under comment letter O15 as it relates to the proposed increase in housing. Transportation impacts are discussed in Section 4.14 of the Draft Program Environmental Impact Report. Also, see response to comments O13-1 and O13-2 under comment letter O13. Since the passage of Senate Bill 743 in 2018, California Environmental Quality Act (CEQA) Guidelines Section 15064.3 no longer uses parking, traffic counts, auto delays, levels of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Vehicle Miles Traveled (VMT) is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020.

In regard to Governor Drive, the proposed roadway design changes would support multi-modal transportation and align with the City's overarching mobility and CAP policy framework. The proposed bicycle facility improvements in Governor Drive would implement the City's Mobility Element, Bicycle Master Plan and CAP policies that support enhancements to non-vehicular modes of transportation and traffic calming measures. In regard to safety concerns, see response to comment O13-3 under comment letter O13.

## Comment Letter I22 - Kristi Dangelo

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] TO STOP REDUCTION OF GOVERNOR DR LANES AND MINIMIZE BUILDING AT SPROUTS AND VONS SHOPPING CENTERS  
**Date:** Tuesday, April 30, 2024 8:59:32 AM

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**From:** Kristi <mkdangelo@san.rr.com>  
**Sent:** Saturday, April 27, 2024 9:47 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>  
**Subject:** [EXTERNAL] TO STOP REDUCTION OF GOVERNOR DR LANES AND MINIMIZE BUILDING AT SPROUTS AND VONS SHOPPING CENTERS

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Please Stop this nonsense! There are 3 schools within a half a mile, two directly off Governor. There are also ball fields, parks, tennis courts, a basketball auditorium and a recreation center and pools on Governor!! There are three freeway entrances, two shopping centers and a main road, Genesee going through Governor and when there is a evacuation we will not be able to get out. There was a jumper over the 5 a few weeks ago and most residential streets were blocked with cars trying to get around the grid lock on Genesee and Governor this went on for an hour. If there was a first responder, they weren't getting through. Our area already had first responder access issues and now you want to add more residences and cut back the main commuting streets for? Where is this logic?

I22-1

I suggest you put this money and efforts into improving upon the areas of San Diego that beg for improvement and can offer more affordable housing. Improve upon the schools, communities, roads and law enforcement in the areas that are more affordable to live. This plan is destructive and detrimental, it's not improvement!

I22-2

Thank you,

Kristina Dangelo

**I22: Response to Kristina Dangelo Comment Letter**

**I22-1:** The comments on Governor Drive have been noted. See response to comment O13-3 under comment letter O13.

**I22-2:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is reComment Letter I23 – Don Danner (Page 1 of 5)



## Comment Letter I23 - Don Danner

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Thursday, April 25, 2024 8:12:13 AM

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**From:** Don Danner <rodbearing50@sbcglobal.net>  
**Sent:** Wednesday, April 24, 2024 6:20 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoelLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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

---

To Whom It May Concern:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

**I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.**

I23-1

I23-2

**II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.**

I23-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

I23-4

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

I23-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I23-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I23-7

I23-8

Sincerely,  
Donald Danner  
53-year resident of University City  
5433 Dalen Avenue  
San Diego, Ca 92122

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on the Draft Program Environmental Impact Report  
**Date:** Tuesday, April 30, 2024 9:03:36 AM

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**From:** Don Danner <rodbearing50@sbcglobal.net>  
**Sent:** Saturday, April 27, 2024 12:56 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Comments on the Draft Program Environmental Impact Report

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

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To Whom It May Concern:

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I23-9

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project.
2. The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document

I23-10

I23-11

inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

I23-11  
cont.

3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.
4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn't feasible.
5. Finally, the City's conclusion that the High Density Alternative was the environmentally superior alternative isn't supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City's own conclusion states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Section 8.2.3, underline added.)

I23-12

I23-13

I23-14

The City should revise the DPEIR to address these issues.

Sincerely,

Donald Danner

53 year resident of University City Community

5433 Dalen Avenue  
San Diego 92122

**I23: Responses to Don Danner Comment Letter**

**I23-1:** See response to comment O13-1 under comment letter O13.

**I23-2:** See response to comment O13-2 under comment letter O13.

**I23-3:** See response to comment O13-3 under comment letter O13.

**I23-4:** See response to comment O13-4 under comment letter O13.

**I23-5:** See response to comment O13-5 under comment letter O13.

**I23-6:** See response to comment O13-6 under comment letter O13.

**I23-7:** See response to comment O13-7 under comment letter O13.

**I23-8:** See response to comment O13-8 under comment letter O13.

**I23-9:** The comment is an introduction to the letter. No response is required.

**I23-10:** See response to comment I11-2 under comment letter I11.

**I23-11:** See response to comment I11-3 under comment letter I11.

**I23-12:** See response to comment I11-4 under comment letter I11.

**I23-13:** See response to comment I11-5 under comment letter I11.

**I23-14:** See response to comment I11-6 under comment letter I11.

## Comment Letter I24 - Roxieann Danner

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Thursday, April 25, 2024 8:12:04 AM

---

**From:** Roxieann Danner <rdanner42@sbcglobal.net>  
**Sent:** Wednesday, April 24, 2024 6:12 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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

---

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I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I24-1

I24-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I24-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve

I24-4

the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I24-4

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I24-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I24-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I24-7

I24-8

Sincerely,  
Roxieann Danner  
55-year resident of University City  
5433 Dalen Avenue  
San Diego, Ca 92122



**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on the Draft Program Environmental Impact Report  
**Date:** Tuesday, April 30, 2024 9:03:01 AM

---

**From:** Roxieann Danner <rdanner42@sbcglobal.net>  
**Sent:** Saturday, April 27, 2024 11:33 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Comments on the Draft Program Environmental Impact Report

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

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### To Whom It May Concern:

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I24-9

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project.
2. The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact

I24-10

I24-11

of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

I24-11

3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.

I24-12

4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn't feasible.

I24-13

5. Finally, the City's conclusion that the High Density Alternative was the environmentally superior alternative isn't supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City's own conclusion states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Section 8.2.3, underline added.)

I24-14

The City should revise the DPEIR to address these issues.

I24-15

Sincerely,  
Roxieann Danner

55 year resident of University City Community  
5433 Dalen Avenue  
San Diego 92122

**I24: Responses to Roxieann Danner Comment Letter**

**I24-1:** See response to comment O13-1 under comment letter O13.

**I24-2:** See response to comment O13-2 under comment letter O13.

**I24-3:** See response to comment O13-3 under comment letter O13.

**I24-4:** See response to comment O13-4 under comment letter O13.

**I24-5:** See response to comment O13-5 under comment letter O13.

**I24-6:** See response to comment O13-6 under comment letter O13.

**I24-7:** See response to comment O13-7 under comment letter O13.

**I24-8:** See response to comment O13-8 under comment letter O13.

**I24-9:** The commenter introduces the concerns listed in the email. No response required.

**I24-10:** See response to comment I11-2 under comment letter I11.

**I24-11:** See response to comment I11-3 under comment letter I11.

**I24-12:** See the response to comment I11-4 under comment letter I11.

**I24-13:** See response to comment I11-15 under comment letter I11.

**I24-14:** See response to comment I116 under comment letter I11.

**I24-15:** Comment noted. See responses above to the commenter's letter. No further response is required.

## Comment Letter I25 - Darcy Davidson

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University City Plan - Serious Safety Concerns  
**Date:** Monday, April 22, 2024 8:41:02 AM

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**From:** Darcy Davidson <darcybdavidson@gmail.com>  
**Sent:** Saturday, April 20, 2024 7:57 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] University City Plan - Serious Safety Concerns

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

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Mayor GLoria and Councilmember Lee,

I know you'll understand the position of the residents of the University City neighborhood that are in strong opposition to many of the elements of the update UC Plan, since you value the safety of our city and were called to serve to protect the residents. As a former city employee with SDFD who now serves in public safety at a nearby city, I too am called to serve and to protect.

I25-1

While it's often said the people fear change, it's not the change, per se, in the updated UC Plan that is frightening, but the combination of significant increase in housing units (which will significantly the number of vehicles) coupled with the planned reduction of Governor Drive's road width. It is a recipe for disaster. The intersections at Governor/Genesee isn't equipped to handle the uptick in traffic and cars will be backed up in traffic for long periods of time. It already takes multiple light cycles at this intersection with a notoriously long interval between green signals.

I25-2

I25-3

Planning for 100 feet building height at the Regents/Governor Drive corner is ridiculous. This intersection is **2 MILES** from the new trolley station. And almost **1 MILE** from Genesee where this is a single bus line. Anyone who says that residents of a building here will take public transit instead of driving a car is miscalculating reality. No one is going to walk 1 to 2 miles to public transit. What they will do is sit in their cars in a long line of traffic down Governor and then up Genesee. If the trolley even takes them to where they want to go. If there were an actual emergency that created a need to evacuate quickly, Governor Drive is the only exit route out for hundreds of homes in a neighborhood bound on all sides by canyons full of flammable vegetation in areas mapped as very high fire severity zones. It is possible to add some multifamily housing units into the Regents/Governor site, but the plan to zone to allow for 100 feet is unsafe, unwise, and simply irresponsible.

I25-4

I25-5

I25-6

Density could be provided at the Governor/Genesee shopping center which is far closer to some transportation. But residents here too would likely drive the mile up to the nearest trolley stop.

What is most troubling about the whole plan is the apparent "need" to build more and more housing. This is fundamentally flawed thinking because there already are hundreds of units in the planning and framing stages in Mira Mesa, at Balboa/Genesee, and Sorrento Valley. Housing is already being built. And why ruin this beautiful gem of a neighborhood with high density. It's the

I25-7

single family homes in the family-oriented community that is what makes South UC so special. Why ruin it needlessly? There are already enough allowances for increased density with the provisions to allow for ADUs, and SB 9 and SB 10. This will allow for a natural increase in density. The situation doesn't need to be forced or worsened by increasing the density in south UC.

**I25-7  
(cont.)**

I could go on and on, but these are my major points. Please protect the safety of the South UC community and require limitations to how our community is changed with the UC Plan. Thank you and feel free to reach out.

**I25-8**

Darcy Davidson  
[darcybdavidson@gmail.com](mailto:darcybdavidson@gmail.com)  
858-344-1598

**I-25: Response to Darcy Davidson Comment Letter**

**I25-1:** The comment introduces the letter and has no specific comments on the Draft Program Environmental Impact Report (PEIR).

**I25-2:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I25-3:** See response to Comment O13-1 under comment letter O13.

**I25-4:** See response to Comment I8-7 under comment letter I8 in regard to the concern about the proposed land uses for the two shopping centers along Governor Drive (the Sprouts shopping center at Regents Road and Governor Drive; and the Vons Shopping Center at Genesee Avenue and Governor Drive)

**I25-5:** See response to Comment O-13-3 under comment letter O13 in regard to the concern about emergency evacuation.

**I25-6:** This comment reiterates the concerns addressed in I25-4. The comment is noted.

**I25-7:** See response to comment O15-5 in comment letter O15. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I25-8:** Comment noted.

**Comment Letter I26 - Traci DeMarco**

(page 1 of 1)



# Comment Letter I26 - Traci DeMarco

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on University Community Plan  
**Date:** Thursday, April 25, 2024 8:11:33 AM

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-----Original Message-----

From: Traci DeMarco <[tmdemarco@att.net](mailto:tmdemarco@att.net)>  
Sent: Wednesday, April 24, 2024 5:10 PM  
To: PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
Subject: [EXTERNAL] Comments on University Community Plan

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

To whom it may concern,

It has come to my attention that there are people trying to change my little community (South University City). As a life long resident (50+years), I would hate to see my community change. Many of the people I have grown up with have returned to UC for the same reasons I did. And I believe that the proposed changes would fundamentally change this community and anger many of the residents.

I26-1

One of the changes I have heard is coming up for vote is to change Governor Drive, the main thoroughfare in UC from 2 lanes each direction to 1 lane each direction. The reasoning I have heard is to add a bike lane going each way. As one of the cyclist in the community, I think this is completely unnecessary. This would cause more harm with the disturbance to traffic flow, especially during school drop-off and pick-up windows, as well as rush hour traffic, than it would create benefit for the cyclists. I ride my bike on Governor Drive and have never had issues with cars. The central part of Governor has a very wide side walk that is often shared by cyclist with little problem. And for more experienced cyclists, I have never experienced issues with the cars. This change would not only affect the traffic for people going east/west on Governor, but it would be a great issue with the traffic turning from Governor to Genessee during all those same times (mainly the left turn towards UCHS). Adding 2 bike lanes that would get limited use, and creating traffic issues is not a win in any way.

I26-2

The second charge I have been informed about is the zoning change for the Vons & Sprout shopping centers. The proposed changes in essence create high rise apartments (400-600 at each center). This would fundamentally change our community and probably create more crime within our quiet little neighborhood. The north part of UC has always been the densely populated area, leave the south side alone. It would be one thing to add another thieves to those shopping centers, but allowing them to go to 100ft is completely wrong.

I26-3

Let's not even go into if you make both of these changes the consequences for our community would exponentially change. Adding more residents, and reducing our street capacity would be the stupidest thing you could do.

I26-4

I encourage you to leave Governor Drive alone and limit the height of the rezoning for the shopping centers to 2 stories.

Thank you,  
Traci DeMarco  
5854 Ithaca Place  
SD 92122

**I26: Response to Traci DeMarco Comment Letter**

**I26-1:** The comment is an introduction to the letter. No response is required.

**I26-2:** See response to comment O13-1 under comment letter O13 in regard to the concern about the proposed changes to Governor Drive.

**I26-3:** See response to comment I8-7 under comment letter I8 in regard to the concern about the proposed changes for the two shopping centers along Governor Drive (the Sprouts shopping center at Regents Road and Governor Drive and the Vons Shopping Center at Genesee Avenue and Governor Drive).

**I26-4:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I27 - Kiah DeSarro

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Planned bike lane for hillcrest  
**Date:** Thursday, April 25, 2024 4:23:46 PM

---

**From:** Kiah Desarro <kiahdesarro@gmail.com>  
**Sent:** Thursday, April 25, 2024 4:04 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Planned bike lane for hillcrest

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

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Hello,

I'm an avid cyclist in the hillcrest area. I also have two small children that I would love to have ride to parks and beach. Unfortunately, getting from hillcrest to mission hills where you can feasibly catch the bike trail to the beach is impossible. The area from first avenue on university to richardson has no protected bike lane, and the street is tight so cars have threatened me verbally, and through using their engines and "revving" or driving very fast past me at a close distance. I'd love to commute places on bike, and encourage others to, but a lot of the bike infrastructure is wasted if it doesn't connect.

The Hillcrest Focused Plan Amendment leaves a crucial gap in the regional bikeway network on West University Avenue. With high vehicle volumes posing safety risks, especially near an elementary school, urgent action is needed. We propose extending the one-way configuration from First Avenue to Washington Street, creating space for a protected bikeway. This revision ensures safe mobility for all users and closes the gap in the complete streets network.

Let me know if you have any questions, thanks!

Kiah DeSarro

I27-1

**I27: Response to Kiah DeSarro Comment Letter**

**I27-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I28 - Mike Devens

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University Community Plan Update Draft EIR  
**Date:** Friday, April 26, 2024 10:51:15 AM

---

-----Original Message-----

From: Galloway, Tait <[TGalloway@sandiego.gov](mailto:TGalloway@sandiego.gov)>  
Sent: Thursday, April 25, 2024 5:13 PM  
To: PLN University Community Plan Update <[planuniversity@sandiego.gov](mailto:planuniversity@sandiego.gov)>; [PLN\\_PlanningCEQA <planningceqa@sandiego.gov>](mailto:PLN_PlanningCEQA@planningceqa@sandiego.gov)  
Subject: FW: [EXTERNAL] University Community Plan Update Draft EIR

-----Original Message-----

From: Mike Devens <[mdevens@san.rr.com](mailto:mdevens@san.rr.com)>  
Sent: Thursday, April 25, 2024 3:40 PM  
To: Galloway, Tait <[TGalloway@sandiego.gov](mailto:TGalloway@sandiego.gov)>  
Subject: [EXTERNAL] University Community Plan Update Draft EIR

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

Dear Mr. Galloway,

Below are my comments (as a 47-year resident of UC0 to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I28-1

I28-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I28-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I28-4

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic

I28-5

requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I28-5  
cont.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I28-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally, it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I28-7

I28-8

Sincerely,

Mike Devens  
2715 Soderblom Ave.  
San Diego, CA 92122  
858-457-4635

**I28: Responses to Mike Devens Comment Letter**

**I28-1:** See response to comment O13-1 under comment letter O13.

**I28-2:** See response to comment O13-2 under comment letter O13.

**I28-3:** See response to comment O13-3 under comment letter O13.

**I28-4:** See response to comment O13-4 under comment letter O13.

**I28-5:** See response to comment O13-5 under comment letter O13.

**I28-6:** See response to comment O13-6 under comment letter O13.

**I28-7:** See response to comment O13-7 under comment letter O13.

**I28-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I29 - Dongdong Dong

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Response to City's latest EIR  
**Date:** Tuesday, April 30, 2024 9:12:44 AM

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**From:** Dongdong <ddd2388@gmail.com>  
**Sent:** Sunday, April 28, 2024 9:50 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Response to City's latest EIR

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Dear Mr./Ms. ,

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I29-1

### **Governor Drive Lane Reductions**

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I29-2

I29-3

I29-4

### **Emergency Ingress/Egress**

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I29-5

### **New High-Rise Apartments Planned for Genesee and Nobel Drive**

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

I29-6

### **Vons & Sprouts Centers New Height and Sharply Higher Density Allowances**

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor

I29-7



Drive/Genesee to 100 feet or 10 stories with residential units added to those areas. That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

I29-7  
cont.

### **Planning Deficiencies in Parks**

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not “greenways” or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The

I29-8

City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

I29-9

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

I29-10

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

I29-11

Sincerely,  
Dongdong Dong  
Owner, 8168 Avenida Navidad, #21  
La Jolla City Club HOA

**I29: Response to Dongdong Dong Comment Letter**

**I29-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted and no further response is required.

**I29-2:** See response to comment I8-2 under comment letter I8.

**I29-3:** See response to comment I8-3 under comment letter I8.

**I29-4:** See response to comment I8-4 under comment letter I8.

**I29-5:** See response to comment I8-5 under comment letter I8.

**I29-6:** See response to comment I8-6 under comment letter I8.

**I29-7:** See response to comment I8-7 under comment letter I8.

**I29-8:** See response to comment I8-8 under comment letter I8.

**I29-9:** See response to comment I8-9 under comment letter I8.

**I29-10:** The comment is in regard to a previous project that is not a part of the proposed project evaluated in the Draft PEIR. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No response is required.

**I29-11:** The comment has been noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I30 - Jennifer Dunway

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Answers needed UC plan update  
**Date:** Tuesday, April 16, 2024 9:06:59 AM

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-----Original Message-----

From: Jennifer Dunaway <jenniferd159@yahoo.com>  
Sent: Sunday, April 14, 2024 2:05 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Cc: Help Save UC <helpsaveuc@gmail.com>; Bonnie Kutch <bkutch@kutchco.com>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
Subject: [EXTERNAL] Answers needed UC plan update

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Governor Drive should remain as four lanes. The arguments to make it two lanes is not based on science. Governor Drive is not in a TPA and is only served by one bus route that does not go the entire length of the street. Community feedback has been overwhelming to keep it at four lanes. The City is still relying on 9 year old traffic count data in a DRAFT existing conditions assessment, known as Appendix A in the Mobility Report. There were many public comments on the need for updated traffic count data. This needs to be done.

I30-1

The Shopping Center at Regents and Genesee (Sprouts Marketplace) is not in a TPA and should remain at current density levels. There is no justification for this strip mall to be changed to high density, just as any similar strip mall in San Diego City, that is on one minor bus route.

I30-2

The EIR incorrectly states on page S 25 that public facilities cannot be identified and placed at this time. This is incorrect since the new density is already in the Draft Plan and known areas for more population is already identified in the Draft Plan. The school district actually pinpointed a location for a new school in Appendix I2. Other facilities can be located as well and the DEIR needs to place them.

I30-3

The emergency evacuation plan is flawed as it relies on current roadway and transportation systems to provide egress. The City is proposing to change most streets to less lanes and less egress, and the new evacuation plan needs to be studied under Plan proposal conditions.

I30-4

The Community Preferred Scenario was active in July 2023 during the UCPG Subcommittee meeting. The City stripped it out of the DEIR without any notice or explanation. IT SHOULD BE IN THE DEIR as it was a scenario that the Subcommittee put forward. Redo the EIR with this alternative.

I30-5

The UCPG Subcommittee in its July 2023 minutes, highlights that the City needs to identify funding and plans for infrastructure as a result of more density. The DEIR and the latest Draft Plan do not do this. This needs to be done, specifically the 910,000,000 that the School District highlights needs to be found for a new school BEFORE new units are built.

I30-6

The Existing UC Plan states Community Goals. These were deleted from the Current Draft. They need to be included.

I30-7

Community Engagement does not have any data on number of comments, what the comments were for and one on one meetings between Nancy Graham and special interest groups. The Community Engagement piece also does not reference two Community Protests on March 11, 2023 and May 6, 2023 against the City preferred scenario, the May 16, 2023 lengthy HELP SAVE UC presentation, the April 6, 2023 Petition by UC PEEPS with specific comments on the Plan and how those comments were integrated into the latest Draft. This needs to be included and the comments need to be explained and weaved into the latest Draft.

I30-8

I30-9

**From:** [Jennifer Dunaway](#)  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** [EXTERNAL] Figure 3-25 draft EIR comment 1  
**Date:** Friday, March 15, 2024 2:17:24 PM

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The proposed recreation centers are NOT on the map. Place them on the map and outline how the City intends to acquire the land, pay for the centers and operate them.  
Jen Dunaway

**I30-10**

**From:** [Jennifer Dunaway](#)  
**To:** [PLN PlanningCEQA](#)  
**Cc:** [Bonnie Kutch](#); [Help Save UC](#); [Chris Nielsen](#); [Andrew Wiese](#); [Paulette92122.](#); [David Wright](#); [MaryAnn Stewart](#); [CouncilMember Kent Lee](#); [Anne Morley](#)  
**Subject:** [EXTERNAL] UC Draft Plan and EIR comments - mobility  
**Date:** Sunday, March 24, 2024 7:57:20 PM  
**Attachments:** [Comments on Draft Mobility Technical Report UC Plan Mar 2024.docx](#)

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Attached are comments on the mobility document. Answers are expected through the public process.

/R Jen Dunaway

I30-11

## Comments on Draft Mobility Technical Report

1. Appendix A is referenced numerous times in this document. Page 6 is the first time. Appendix A is the DRAFT Existing Conditions Summary Report from 2018. This document does not state it is DRAFT. How can the EIR be finalized when the existing conditions summary report is still in draft form and from 2018? This is the same document I received in a public records request 24-432 asking for the final. This document should not be completed until Appendix A receives comment and is updated to reflect UC in 2024.
2. Section 1.4.1. VMT is stated as being used for mixed use, infill or transit oriented areas, not for a single family neighborhood outside of a transit area such as UC south. It does not apply in this area of UC and different methodology should be analyzed. The VMT is questionable and by its own disclaimer, should not be utilized for hard decisions and should be for information only. See APPENDIX F 6 and F 7. Other more traditional methods such as traffic counts, Level of Service, volume and assumptions on future growth and traffic should be analyzed. More people beget more traffic. It does not decrease.
3. 2.1.1. This is a draft 2018 existing conditions summary. The copy is on the City's website and was furnished in Public Records request 24-432. This document needs to be out for community comment and finalize before this Plan proceeds further.
4. 2.1.2 What has been vetted by the community? Who in the community vetted it?
5. 2.1.2. What public input, specifically? The City recorded all Zoom meetings and received comments in various sessions and emails. Most comments received in the last two years was to have Governor alone. Provide the data on public comments specifically for Governor Drive. It will show that the community wants Governor Drive to remain 4 lanes.
6. 2.1.3 The city is not an employer of the residents of UC; this is not an equivalent comparison. What evidence suggests that the new traffic distributions will happen? What metrics were used in this analysis and statement?
7. 2.1.3. What does integrating communication strategies mean specifically for UC? What does communication with connected vehicles mean- what vehicles for example? And whose vehicles? How is it maintaining relevancy? What metrics or evidence or figures were used in this statement?
8. 2.3.2. re: bike paths. How is bicycle demand high measured? Where are the metrics and evidence to support this statement? Bicycle demand is not high on Governor Drive based on community usage and observation.
9. 2.3.2 ( class 2 specifically): How is high demand defined? How are low speed and low volume defined? Where are the metrics, analysis and evidence for each of these three measures provided? How were these routes chosen and based on what? Governor Drive should not be included based on low demand and low speed.
10. 2.4.1. Differentiation between North and South UC should be made. High levels are only in the north area. Low levels are in the South and should have a marked difference in recommendations.
11. Table 2-2 : Approximately 95% of the streets have the City recommending less travel lanes than today. This is in conflict with the direct addition of more people and housing units to the area, with no increase in roadways. Almost all of these streets will have a loss of Level of Service and increase in VMT, based on the likelihood of unit inhabitants having at least one vehicle. The VMT in Appendix F 6 and F7 are to be used for information only and are experimental in nature. In

I30-12

addition the VMT only model is only for transit areas, not for low density residential areas, some of which are in UC. The current roadways should be kept. In addition, fire and police response times need to be analyzed with data and metrics to determine current response times and future response times under 1) scenario with more population and current roadways, and 2) scenario with additional Plan population increases at 2050 and City proposal roadways.

12. 2.5.2 parking removal: Who defines attractive and competitive alternatives? How are they defined and where is the community engagement and comments? What evidence is provided that new residents will not have personal vehicles? What usage of current roadway parking is currently measured? What evidence is provided that less street parking and more residents will result in more residents selling their vehicles or not having vehicles? Existing parking should be maintained and expanded for new residents.
13. 3.5 What reference defines Complete streets? This effort is supposed to serve the needs of all users, including those in motor vehicles. This plan is a detriment and makes LOS worse for those in the latter group. This plan needs to be equitable and not make it worse for drivers of motor vehicles while encouraging those in other modes. How will the City ensure equitable access?
14. 3.5 - 3 collisions in 5 years. How is this in comparison with other similar areas? Any more recent data from the last 7 years? Look at police reports from 2017 to 2024. This Plan makes it appear that 3 in 5 years is poor without any comparison to reference data or other areas in the City. It does not appear to be poor.
15. 3.5 The Plan writer defines Governor Drive as High Stress for bicyclists. How is this defined and measured? Where are the references and comparisons with other areas to provide reference. Governor Drive is low stress based on personal experience. The writer is slanting his/her opinion in this document to suggest a reduction in lanes at Governor Drive. This should be removed.
16. 3.5 – planned “improvements”. The writer frames reducing lanes from 4 to 2 as an improvement. It does not define improve for whom, but it is to the detriment of residents trying to travel to school, work and businesses in vehicles. This plan needs to be equitable to all users. The assumptions in this section are based on what evidence and data? What is the expected result for LOS, and expected VMT with the planned increase in residents for those in vehicles? For first responders? What is the expected LOS change? How does this compare with similar streets in SD? This section is opinionated and not based on data, facts or evidence. It should be removed from the plan. The community comments during the last two years have been clear that they do not want it.
17. Appendix A is a draft conditions assessment I received in a public records request. Why is a draft document from 2018 without public comment and finalization being released in a EIR and draft final Plan?
18. Appendix B, page 13: The statement about VMT being substantially improved based on what data and evidence? This should be used as information and experimental only along with other standard measures such as LOS, traffic count data, and expected travel by new residents.
19. Appendix A of Appendix B: This explains the methodology in a series of memos from a contractor, WSP USA, on how to calculate growth areas. This is experimental. Where is the evidence and facts that prove these assumptions are valid beyond experimental? The memo states “areas of SD that are receptive to future housing and retail - what areas are 'receptive' and who is giving that impression of receptiveness? How is receptive defined and measured?

**I30-12  
cont.**

Other standard ways of measuring growth and mobility shall be considered and this should be considered information only as it cannot be validated.

20. Appendix A of Appendix B: What peer review has been done on this process? Where has this concept and methodology been done before? Why is the City relying on unproven technology? The City should rely on standard, proven, validated ways to make assumptions on growth and mobility.
21. Appendix F6 and F7; The disclaimers at the bottom of these analyses state to use this as a resource only and it is an interpretation of data. UC is not an experiment for the City to run scenarios and guess at growth. UC deserves equity and should have data, analysis and vetted metrics to use to make assumptions on growth and mobility. This should be removed.

**I30-12  
cont.**



**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comment on DEIR - Schools - location and need for potential facilities  
**Date:** Thursday, April 11, 2024 11:50:41 AM

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-----Original Message-----

From: Jennifer Dunaway <jenniferd159@yahoo.com>  
Sent: Wednesday, April 10, 2024 3:34 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Cc: Help Save UC <helpsaveuc@gmail.com>; Bonnie Kutch <bkutch@kutchco.com>; Andrea Contreras <andrea@sddirtlaw.com>  
Subject: [EXTERNAL] Comment on DEIR - Schools - location and need for potential facilities

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Question on Schools.

Page S-25, impact to Schools. The DEIR states that "Implementation of the University CPU could result in the need for additional fire-rescue, police, school, and library facilities. As the location and need for potential future facilities cannot be determined at this time, "

This is a lie. Appendix I2, a memo from the San Diego Unified School District, specifically states that the UC Plan Update should have a location identified for new schools, and specifically states it should be in the vicinity of Genesee and La Jolla Village Drive.

The location and the need are determined at this time.

In addition, with the density maps provided, fire and police and library locations can be identified based on the growth areas delineated in the DEIR.

The EIR needs to show where the new facilities will go. V/R Jen Dunaway

I30-13

I30-14

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] UCPG Minutes July 11, 2023 - Scenarios for UC Plan and the DEIR  
**Date:** Tuesday, April 16, 2024 10:34:58 AM

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-----Original Message-----

From: Jennifer Dunaway <jenniferd159@yahoo.com>  
Sent: Wednesday, April 10, 2024 3:56 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>  
Cc: Help Save UC <helpsaveuc@gmail.com>; Bonnie Kutch <bkutch@kutchco.com>; Andrew Wiese <awiese@sdsu.edu>; Andrea Contreras <andrea@sddirtlaw.com>  
Subject: [EXTERNAL] UCPG Minutes July 11, 2023 - Scenarios for UC Plan and the DEIR

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Coby and Suchi and CEQA mailbox:

10 city staffers could not answer Mr. Weise's question last night as to why the Community Scenario was not included in the Draft EIR.

Per the minutes from the UCPG meeting, " Two alternative land use scenarios - a Staff Preferred Scenario and a Community Planning Group Subcommittee Input Scenario. The Discussion Draft does not include:

- A proposal to rezone single family residential areas for townhouses.
- The very high density "Scenario 1." "

Link to minutes here: [https://urldefense.com/v3/\\_https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usrfiles.com/ugd/bf5c85\\_4f7352b49cd645b19da4709cc4855c22.pdf\\_!!OBed2aHXvKmHymw!xfHfn9lITvypu3uJBNIB96px4a7ttsC-Q1F0WhGjXHTXFNxZqQ-DhPGAWBmpq7ITLJsRT00qVczC89opZH5aKvMPKl2FHg\\$](https://urldefense.com/v3/_https://bf5c854d-f91f-4d3a-bacd-48151e76d7f5.usrfiles.com/ugd/bf5c85_4f7352b49cd645b19da4709cc4855c22.pdf_!!OBed2aHXvKmHymw!xfHfn9lITvypu3uJBNIB96px4a7ttsC-Q1F0WhGjXHTXFNxZqQ-DhPGAWBmpq7ITLJsRT00qVczC89opZH5aKvMPKl2FHg$)

This begs the question asked last night - why wasn't the Community's Scenario in the DEIR? Why did City Planning revive the "very high" Scenario 1 when it was discarded in July 2023?

This is not how the process is supposed to work with identifying scenarios and then performing the EIR. The ten city employees present at last night's meeting could not answer how that got into their own document.

Please advise how the City Planning staff intends to fix this problem./R Jen Dunaway

130-15

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comment on EIR UC  
**Date:** Tuesday, April 16, 2024 10:35:33 AM

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-----Original Message-----

From: Jennifer Dunaway <jenniferd159@yahoo.com>  
Sent: Tuesday, April 9, 2024 8:34 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Subject: [EXTERNAL] Comment on EIR UC

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Suchi et al:

Why wasn't the community preferred scenario included in the draft EIR along with the City Planning scenario? Since these two scenarios were active and in discussion up until the latest draft, they both should have been in the EIR.

Instead the City Planning staff added a discarded scenario to the EIR; why did the City revive a discarded scenario?

The EIR needs to be re-evaluated with the community preferred scenario.

/R Jen Dunaway

I30-16

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] schools UC Plan update comment and questions  
**Date:** Tuesday, April 16, 2024 10:42:18 AM

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-----Original Message-----

From: Jennifer Dunaway <jenniferd159@yahoo.com>  
Sent: Thursday, April 11, 2024 7:50 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Cc: Andrea Contreras <andrea@sddirtlaw.com>; Bonnie Kutch <bkutch@kutchco.com>  
Subject: [EXTERNAL] schools UC Plan update comment and questions

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Identify where the 1.8 recreation centers missing from the Plan will go. analyze and show any mitigation efforts associated with such in the DEIR. Identify why the one new recreation center at Torrey Pines was chosen based on new density and proposed locations of new units. Explain why a site far from any new housing units was chosen to be a recreation center. Show the analysis.

I30-17

Identify where the new elementary school(s) will be located in the Plan as identified by SDUSD in Appendix I2. The location SDUSD recommends is near La Jolla Village Drive and Genesee Avenue. Identify how the city will raise developer fees and build the school before the units are constructed per Appendix I2. Analyze and show mitigation efforts associated with this in the DEIR.

I30-18

/R Jen Dunaway

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] UC community engagement  
**Date:** Tuesday, April 16, 2024 10:42:34 AM  
**Attachments:** [Letter to City Officials from UC Peeps \(1\).docx](#)

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-----Original Message-----

From: Jennifer Dunaway <jenniferd159@yahoo.com>  
Sent: Thursday, April 11, 2024 7:29 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Cc: Bonnie Kutch <bkutch@kutchco.com>  
Subject: [EXTERNAL] UC community engagement

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

City of San Diego:

Remember this letter? This was not mentioned, included, commented on, or utilized to make any changes to the Plan. There are many community member signatures on this document. Why isn't this included under community engagement? Why are these comments not included in the Community Engagement section? /R Jen Dunaway

I30-19



March 20, 2023

TO: Mayor Todd Gloria, Planning Director Heidi Vonblum, Development Project Manager Nancy Graham, and Senior Traffic Engineer Leo Alo

FROM: UC PEEPS  
A Coalition of University City Residents and Taxpayers

Dear Mayor Gloria, Ms. Vonblum, Ms. Graham and Mr. Alo:

This letter is to provide collective comments from a large group of University City (UC) residents substantiating reasons why the City of San Diego needs to further reduce the proposed number of housing units in Land Use Scenarios A and B of the proposed University Community Plan Update.

Adding between 30,000 and 33,000 housing units, as Land Use Scenarios A and B suggest, or as many as 56,000 housing units, as pro-development groups are calling for, represents exceptionally poor planning, especially when you consider our small 7.35-square-mile footprint and the limited capacity of our existing infrastructure. Our specific objections are summarized below:

**Enormity of Housing Units Being Proposed:** We know San Diego needs more *affordable* housing, but we need a *reasonable increase* in new housing units in UC. What the City is proposing for UC is far beyond the number of new housing units that are actually needed, which SANDAG's Series 14 Forecast projects is 554 between 2025 and 2050. There is absolutely **no** call for placing more.

With an existing number of approximately 27,000 housing units, UC is a vibrant, built-out community that already has had thousands of new apartment units added, mostly to its core and east end of Governor Drive, since the last Plan Update in 1987. Hundreds of these new units have been built in just the last few years, including Palisades at UTC and Lux. All of these new apartment high-rises have been added without substantially improving our existing infrastructure, given the absence of funding and undeveloped land.

San Diego's 2021-2029 Housing Element is just 108,036, and approximately 20,000 housing units were built in 2021 and 2022, leaving just 88,000. The balance needed should be spread throughout San Diego's 52 neighborhoods, not concentrated into UC's small area.

**Inadequate Infrastructure & Law Enforcement:** The City plans to add tens of thousands of people, without regards to the existing, limited infrastructure. There **are no provisions** to add new infrastructure, including roadways, schools, parks, recreational facilities, libraries, fire &

I30-19  
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safety facilities and water & sewer systems. There's no money to fund new infrastructure, and there's no undeveloped land left here to add them.

San Diego Unified School District does not appear to have the funds or land available to build additional elementary, middle or high schools for the area, especially in north UC, where schools are lacking.

Our recreation centers are already crowded, with parking lots generally full and tennis courts overbooked. There are no vacant parking areas left for the additional vehicles that would come with more residents living here. We also have a limited number of parks in UC that are already in continuous use.

Genesee Avenue and Governor Drive are already extremely congested at peak commute hours and when all of the schools let out. Added population would bring traffic to a standstill.

The San Diego Police Department, Northern Division, has stated it would be unable to provide adequate police, emergency response, and fire support for our community since it lacks both the funding and the personnel. Crime rates will surge upward if the population increases.

The City needs to rethink how it would possibly accommodate such a drastic population increase without the necessary infrastructure and law enforcement needed to accommodate it.

**Wrong Type of Housing:** The City has been calling for affordable housing for all. However, the type of housing that would be built in UC would be anything but affordable. Land is expensive here, and affordably priced housing doesn't pencil out. Instead, developers would build more luxury high-rise apartment buildings with small units that rent for \$4,000 a month and up, with projects like The Palisades at UTC and Lux as prime examples.

Research studies conducted by such firms as London Moeder Advisors reveal that San Diego already has a surplus of around 15,000 small, one- and two-bedroom rental apartments, when 100 percent of the current demand is for single-family homes where families can live and thrive.

Exacerbating the problem is that many of these new rental units would be constructed by demolishing existing, relatively affordable rental properties. The few subsidized/affordable rate units that might be built would likely to be rented very quickly and have very low turnover. Students, in particular, would be priced out of the market.

Instead of building more rentals in UC, where high land values attract the affluent and create bid-up pricing for the middle class, San Diego has an obligation to address the needs of its low-income and at-risk population by constructing both infrastructure and new housing in its historically neglected and low-income communities.

**Misconception About Public Transportation:** The transportation argument the City is making has no grounds in reality, at least in the foreseeable future and here in south UC. First, the existing transportation system throughout San Diego is sorely inadequate. To get around the city by bus or trolley is an ordeal, because the city was not originally planned for public transportation. Trying to add it after the fact has been sketchy at best. The region's two transit agencies just announced they are currently facing budget shortfalls impacting operations, which means public transportation will become even worse.

I30-19  
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Second, studies show that the majority of people will continue to use their cars, as most people are moving to EVs. It's especially unrealistic to think that residents within south UC's single-family neighborhoods will use public transportation to transport their children, baby gear, loads of groceries, garden supplies, home goods and everything else aboard a bike or bus.

Third, the city justified spending such an exorbitant amount of taxpayer money to build the Mid-coast Trolley Extension by stating it would provide access to UTC for students and others living in lower-cost neighborhoods. Concentrating new housing in UC makes little sense since those living in UC are far more likely to use their vehicles to travel to other parts of the city rather than taking public transportation.

**Traffic & Safety Issues Along Governor Drive:** Placing as many as 1,000 to 1,200 combined housing units at UC Marketplace (Sprouts shopping center) and University Square (Vons shopping center), and possibly more high-rise housing at all four corners of Genesee Avenue and Governor Drive, would add enormous traffic along Governor Drive, which would make it extremely difficult for emergency vehicles to reach us in the event of an earthquake or wildfire in Rose Canyon. The only escape route is toward Genesee Avenue, which is already heavily congested. Police and ambulances would have an even harder time responding to residents' calls for help.

With three schools, a park, and two aquatic centers all located along Governor Drive, any additional traffic would compromise the safety of children, along with parents attempting to drop off and pick up their children. The City needs to perform studies of the potential impacts.

If the City goes forward with its plans to reduce Governor Drive to a single lane in each direction to accommodate a bike lane, the result would be complete traffic gridlock in the mornings, afternoons when the three schools let out, and during the evening rush hour, when motorists use Governor Drive as a shortcut to Regents Road and the I-805.

**Governor Drive Shopping Centers:** In addition to the traffic concerns, the proposed rezoning at the Vons and Sprouts shopping centers to accommodate as many as 500-600 housing units at each center would be completely out of scale and character of the surrounding neighborhood.

It is unknown how much retail these centers would retain if they were redeveloped, which is of great concern to residents who rely on the existing stores, services and restaurants. If retail stores were to be diminished, residents would need to drive to other communities to shop and eat out, which goes against the City's Climate Action Program. For many seniors who no longer drive, it would prove to be an even greater hardship.

If housing is added to these centers, zoning for the two shopping centers should remain at its current level of 29 housing units per acre at most.

**Impacts on Open Space:** Open space areas are at a premium in our community and need to be protected. Increased housing density and population would threaten the flora and fauna in Rose Canyon, which surrounds south UC on three sides.

### **Conclusion:**

While we acknowledge the need for more affordable housing in San Diego, University City is the **wrong place to add any more than 5,000 to 10,000 units** over the next 30 years. It would be

I30-19  
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reckless for the City to proceed with zoning for any more when there is no infrastructure to accommodate more people.

Housing demand in San Diego is for more single-family homes, not more luxury apartment high-rises, which have already saturated the market.

The City's vision of people suddenly transitioning to public transportation is idealistic, but not realistic. Our region was not planned for public transportation, and attempts to make a transit-friendly city have failed. As proof, one only needs to look at the trolley and buses passing by that are almost completely devoid of passengers.

There is absolutely no reason for upzoning anywhere in the single-family neighborhoods of south University City. This area is built out, and any additional traffic in this area will cause traffic gridlock and pose a viable threat to the safety of the residents, particularly our children.

The City doesn't appear to be listening to UC residents -- *tax-paying, voting citizens* who have worked decades so they could purchase homes in a single-family neighborhood. Our leading realtors will attest to the fact that a large portion of the home sales in recent years in UC have been to young couples starting families. They specifically chose UC for its family-oriented environment where schools are good, parks and recreation facilities are close by, and the crime rate is relatively low. The City's plan to add enormous density here will destroy our neighborhoods and quality of life.

With new state-mandated housing, the City of San Diego has an opportunity to revitalize impoverished neighborhoods, repurpose industrial and commercial buildings, and help us live up to our reputation as "America's Finest City." It is unconscionable that the City is aiming to ruin established, well-planned, desirable neighborhoods instead.

We request that the City consider the dire consequences of going forward with its unreasonable and life-threatening Land Use Scenarios in University City and work with our community to develop a far more sensible plan. We are available to meet to discuss this further.

Sincerely,

UC PEEPS, Including:

Judy Murphy  
Barba Gellman  
Beth Zanelli  
Pam Connelly  
Angie Jones  
Josh Jones  
Nancy Powell  
Anne Morley  
Joanne Adams  
Clare Gibson  
Denise Olson  
Diane DiRe  
Lisa Clark  
Greg Jaccard  
Susan Ros

**I30-19  
cont.**

Eddie Ros  
Grady Olson  
Peggy Walter  
Jennifer Dunaway  
Tom Ruff  
Susan Nelson  
Rich Woods  
Evelin Ruibac  
Kashy Mary  
Karen Drogin  
Haynes Pitts  
Rob "Beej" Zievers  
Nina Podhorsky  
Suzanna Flock  
Devora Rossi  
Bill Mitchell  
Liz Fitch  
Natacha Schrantz  
Jeanine Jacobson  
Therese Connor  
Michael Kozma  
Greg Gibson  
Greg Longmire  
John Mattison  
Pedro Aza-Blanc  
Mirian Schnaidman  
Bryan Winkler  
Nancy Beck  
Bonnie Kutch

cc: Councilman Kent Lee, District 6 Director of Community Engagement & UC Community Representative Dustin Nguyen, Councilman Joe LaCava, Tait Galloway, Andy Wiese, Chris Nielsen, Help Save UC

**I30-19  
cont.**

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Fw: University CPU Mobility Analysis UC Plan  
**Date:** Tuesday, April 16, 2024 10:44:24 AM

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**From:** Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)>  
**Sent:** Thursday, April 11, 2024 7:30 PM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Subject:** [EXTERNAL] Fw: University CPU Mobility Analysis UC Plan

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

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Comment on application of VMT. Answers expected. Thanks, Jen Dunaway

----- Forwarded Message -----

**From:** Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)>  
**To:** "[asantacroce@sandiego.gov](mailto:asantacroce@sandiego.gov)" <[asantacroce@sandiego.gov](mailto:asantacroce@sandiego.gov)>; Alo, Leo <[lalo@sandiego.gov](mailto:lalo@sandiego.gov)>; Tait Galloway <[tgalloway@sandiego.gov](mailto:tgalloway@sandiego.gov)>; Coby Tomlins <[ctomlins@sandiego.gov](mailto:ctomlins@sandiego.gov)>  
**Cc:** CouncilMember Kent Lee <[kentlee@sandiego.gov](mailto:kentlee@sandiego.gov)>; Andrew Wiese <[awiese@sdsu.edu](mailto:awiese@sdsu.edu)>; Help Save UC <[helpsaveuc@gmail.com](mailto:helpsaveuc@gmail.com)>; Anne Morley <[annie@amorleydesign.com](mailto:annie@amorleydesign.com)>; MaryAnn Stewart <[mafstewart@gmail.com](mailto:mafstewart@gmail.com)>; David Wright <[dwright@s11.com](mailto:dwright@s11.com)>; Bonnie Kutch <[bkutch@kutchco.com](mailto:bkutch@kutchco.com)>; "[arden.karen@gmail.com](mailto:arden.karen@gmail.com)" <[arden.karen@gmail.com](mailto:arden.karen@gmail.com)>; Paulette92122 . <[paulette.williams@gmail.com](mailto:paulette.williams@gmail.com)>; Eugenie Seman <[eugenieseman@san.rr.com](mailto:eugenieseman@san.rr.com)>  
**Sent:** Thursday, April 11, 2024 at 07:24:31 PM PDT  
**Subject:** Re: University CPU Mobility Analysis

Mr. Alo;  
Thanks for showing up at the UC Community Meeting on 9 April.

I wanted to clarify a few things before next week's meeting. Per the Mobility Analysis, "Senate Bill 743 (SB 743) was signed into law in September 2013, modifying the existing California Environmental Quality Act (CEQA) by removing auto delay, level of service (LOS), parking and other vehicular capacity measures as metrics of transportation system impacts for mixed-use, infill or transit oriented development projects."

Governor Drive is not in a transit area, and the UC Plan is not a development project. It is a planning tool. The City's own slides do not say it is a project, but "provides guidance and policies".

In the Mobility Report it also states in Appendix F and G that "The maps provided by SANDAG are an interpretation of the Senate Bill 743 Technical Advisory guidelines published by the California Office of Planning and Research and are provided as a resource to the jurisdictions in the San Diego region to use as they see fit. Users of the data should exercise their professional judgment in reviewing, evaluating and analyzing VMT reduction estimate results from the tool. Each agency should consult with CEQA experts and legal counsel regarding their own CEQA practices and updates to local policies. Refer to full disclaimer and additional information relating to the use of the SB 743 VMT Map Web Application."

This data is provided as a resource and is an interpretation of data. The City should not be relying on it exclusively for making major decisions about UC.

Lastly, the Community opposition to reducing Governor Drive has been robust; you Mr. Alo and your peers have not furnished any data that accurately provides rationale to do otherwise.

/R Jen Dunaway

On Friday, March 29, 2024 at 05:32:29 PM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Greetings;

Mr. Alo, Mr. Santacroce:

This is the 40th email I have sent to Mr. Alo requesting information on the latest traffic count surveys, latest analysis of traffic projections, and impacts from Coste Verde and other developments in line with the proposed update to the UC Community Plan.

Mr. Alo: you presented yourself as the POC with email address provided at our February 2023 meeting. What was your role at the meeting? Why did you give out your email?

I received information from my public records request; it references 9 year old traffic count data. Is this the best the City can do? And the document the City sent me was from 2018 and labeled a DRAFT. Where is the Final? It has been 6 years and the City hasn't finalized the Existing Conditions Summary report?  
/R

On Sunday, March 24, 2024 at 08:28:34 PM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Greetings;

Mr. Alo, Mr. Santacroce:

This is the 39th email I have sent to Mr. Alo requesting information on the latest traffic count surveys, latest analysis of traffic projections, and impacts from Coste Verde and other developments in line with the proposed update to the UC Community Plan.

Mr. Alo: you presented yourself as the POC with email address provided at our February 2023 meeting. What was your role at the meeting? Why did you give out your email?

I received information from my public records request; it references 9 year old traffic count data. Is this the best the City can do? And the document the City sent me was from 2018 and labeled a DRAFT. Where is the Final? It has been 6 years and the City hasn't finalized the Existing Conditions Summary report?  
/R

On Friday, March 15, 2024 at 02:34:25 PM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Greetings;

Mr. Alo, Mr. Santacroce:

This is the 38th email I have sent to Mr. Alo requesting information on the latest traffic count surveys, latest analysis of traffic projections, and impacts from Coste Verde and other developments in line with the proposed update to the UC Community Plan.

Mr. Alo: you presented yourself as the POC with email address provided at our February 2023 meeting. What was your role at the meeting? Why did you give out your email?

I received information from my public records request; it references 9 year old traffic count data. Is this the best the City can do? And the document the City sent me was from 2018 and labeled a DRAFT. Where is the Final? It has been 6 years and the City hasn't finalized the Existing Conditions Summary report?  
/R

On Sunday, February 18, 2024 at 01:38:18 PM PST, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Greetings;

Mr. Alo, Mr. Santacroce:

This is the 37th email I have sent to Mr. Alo requesting information on the latest traffic count surveys, latest analysis of traffic projections, and impacts from Coste Verde and other developments in line with the proposed update to the UC Community Plan.

130-21

Mr. Alo: you presented yourself as the POC with email address provided at our February 2023 meeting. What was your role at the meeting? Why did you give out your email?

I received information from my public records request; it references 9 year old traffic count data. Is this the best the City can do? And the document the City sent me was from 2018 and labeled a DRAFT. Where is the Final? It has been 6 years and the City hasn't finalized the Existing Conditions Summary report?

/R

On Saturday, February 10, 2024 at 10:12:21 AM PST, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Greetings;

Mr. Alo, Mr. Santacroce:

This is the 36th email I have sent to Mr. Alo requesting information on the latest traffic count surveys, latest analysis of traffic projections, and impacts from Coste Verde and other developments in line with the proposed update to the UC Community Plan.

Mr. Alo: you presented yourself as the POC with email address provided at our February 2023 meeting. What was your role at the meeting? Why did you give out your email?

Mr. Santacroce, as the "communications" arm of the City for transportation, I am asking you to assist Mr. Alo in sending an email or a phone call to communicate. Thank you, Jen Dunaway

On Friday, January 19, 2024 at 02:03:43 PM PST, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Greetings;

Mr. Alo, Mr. Santacroce:

This is the 35th email I have sent to Mr. Alo requesting information on the latest traffic count surveys, latest analysis of traffic projections, and impacts from Coste Verde and other developments in line with the proposed update to the UC Community Plan.

Mr. Alo: you presented yourself as the POC with email address provided at our February 2023 meeting. I am left wondering why you won't respond to emails that you solicited at our meeting?

Mr. Santacroce, as the "communications" arm of the City for transportation, I am asking you to assist Mr. Alo in sending an email or a phone call to communicate. Thank you, Jen Dunaway

On Friday, January 12, 2024 at 11:10:46 AM PST, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Greetings;

Mr. Alo, Mr. Santacroce:

This is the 34th email I have sent to Mr. Alo requesting information on the latest traffic count surveys, latest analysis of traffic projections, and impacts from Coste Verde and other developments in line with the proposed update to the UC Community Plan.

Mr. Alo: you presented yourself as the POC with email address provided at our February 2023 meeting. I am left wondering why you won't respond to emails that you solicited at our meeting?

Mr. Santacroce, as the "communications" arm of the City for transportation, I am asking you to assist Mr. Alo in sending an email or a phone call to communicate. Thank you, Jen Dunaway

On Friday, January 5, 2024 at 04:43:34 PM PST, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

**I30-21  
cont.**

Greetings;

Mr. Alo, Mr. Santacroce:

This is the 33rd email I have sent to Mr. Alo requesting information on the latest traffic count surveys, latest analysis of traffic projections, and impacts from Coste Verde and other developments in line with the proposed update to the UC Community Plan.

Mr. Alo: you presented yourself as the POC with email address provided at our February 2023 meeting. I am left wondering why you won't respond to emails that you solicited at our meeting?

Mr. Santacroce, as the "communications" arm of the City for transportation, I am asking you to assist Mr. Alo in sending an email or a phone call to communicate. Thank you, Jen Dunaway

On Friday, December 29, 2023 at 12:41:38 PM PST, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Greetings;

Mr. Alo, Mr. Santacroce:

This is the 32nd email I have sent to Mr. Alo requesting information on the latest traffic count surveys, latest analysis of traffic projections, and impacts from Coste Verde and other developments in line with the proposed update to the UC Community Plan.

Mr. Alo: you presented yourself as the POC with email address provided at our February 2023 meeting. I am left wondering why you won't respond to emails that you solicited at our meeting?

Mr. Santacroce, as the "communications" arm of the City for transportation, I am asking you to assist Mr. Alo in sending an email or a phone call to communicate. Thank you, Jen Dunaway

On Tuesday, December 19, 2023 at 03:55:29 PM PST, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

This is the 31st email I have sent to you that goes unanswered. I am left wondering why it is ok for City employees to ignore repeated requests for information. Why?

Why bother telling us you are our point of contact for transportation when you have no intention of responding? Why?

I was a City of San Diego employee once. I got calls from random citizens. I answered those calls, even when I didn't want to. Where is your duty as a public employee?

As a reminder, in February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee. There is an expectation that you provided your email as to correspond with the community. I am asking you to correspond.

In the public records request that I initiated, your name and references were present.

There were a few emails from you to Coby Tomlins and others about the task order to study transportation in the EIR. Another from Mr. Alo was about Governor Drive. The files referenced included Governor Drive striping plans, dimensions, and

machine count data from April 2023).

Can you provide please?

On Wednesday, December 13, 2023 at 05:26:18 PM PST, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

This is the 30th email I have sent to you that goes unanswered.

As a reminder, in February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee. There is an expectation that you provided your email as to correspond with the community. I am asking you to correspond.

In the public records request that I initiated, your name and references were present.

There were a few emails from you to Coby Tomlins and others about the task order to study transportation in the EIR. Another from Mr. Alo was about Governor Drive. The files referenced included Governor Drive striping plans, dimensions, and machine count data from April 2023).

Can you provide please?

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 30 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Wednesday, November 29, 2023 at 04:10:23 PM PST, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

As a reminder, in February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee. There is an expectation that you provided your email as to correspond with the community. I am asking you to correspond.

In the public records request that I initiated, your name and references were present.

There were a few emails from you to Coby Tomlins and others about the task order to study transportation in the EIR. Another from Mr. Alo was about Governor Drive. The files referenced included Governor Drive striping plans, dimensions, and machine count data from April 2023).

Can you provide please?

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 29 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?



This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Friday, November 17, 2023 at 07:27:53 AM PST, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

As a reminder, in February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee. There is an expectation that you provided your email as to correspond with the community. I am asking you to correspond.

In the public records request that I initiated, your name and references were present.

There were a few emails from you to Coby Tomlins and others about the task order to study transportation in the EIR. Another from Mr. Alo was about Governor Drive. The files referenced included Governor Drive striping plans, dimensions, and machine count data from April 2023).

Can you provide please?

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 28 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates

for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is.  
/R

On Friday, November 3, 2023 at 10:23:08 AM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

As a reminder, in February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee. There is an expectation that you provided your email as to correspond with the community. I am asking you to correspond.

In the public records request that I initiated, your name and references were present.

There were a few emails from you to Coby Tomlins and others about the task order to study transportation in the EIR. Another from Mr. Alo was about Governor Drive. The files referenced included Governor Drive striping plans, dimensions, and machine count data from April 2023).

Can you provide please?

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 27 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an

analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Wednesday, October 25, 2023 at 08:34:33 AM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

In the public records request that I initiated, your name and references were present.

There were a few emails from you to Coby Tomlins and others about the task order to study transportation in the EIR. Another from Mr. Alo was about Governor Drive. The files referenced included Governor Drive striping plans, dimensions, and machine count data from April 2023).

Where is it? Why do I have to email you 25 times to ask for it?

As a reminder, in February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee.

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 26 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting

commuter cross traffic as well as other factors.  
What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Sunday, October 8, 2023 at 11:11:42 AM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

In the public records request that I initiated, your name and references were present.

There were a few emails from you to Coby Tomlins and others about the task order to study transportation in the EIR. Another from Mr. Alo was about Governor Drive. The files referenced included Governor Drive striping plans, dimensions, and machine count data from April 2023).

Where is it? Why do I have to email you 25 times to ask for it?

As a reminder, in February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee.

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 25 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling,

Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors. What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Thursday, September 28, 2023 at 03:35:01 PM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

In February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee.

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 24 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Friday, September 22, 2023 at 06:57:46 AM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

In February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee.

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 23 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Thursday, September 14, 2023 at 04:49:27 PM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

In February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee.

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 22 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Friday, September 8, 2023 at 02:43:19 PM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

In February, you provided your email as a Point of Contact for questions to the UC Plan Update Committee.

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 21 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Friday, September 1, 2023 at 02:23:55 PM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

In February, you provided your email as a Point of Contact for questions to the UC Plan Update



Committee.

If you are NOT THE RIGHT PERSON, please advise and I will ask someone else. As a courtesy, you can direct me to someone who can answer the questions, and I won't email you anymore.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 20 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors. What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Friday, August 25, 2023 at 07:47:20 AM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:  
In February, you provided your email as a Point of

Contact for questions to the UC Plan Update Committee. If you are NOT THE RIGHT PERSON, please advise and I will ask someone else.

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 19 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Monday, August 21, 2023 at 04:33:54 PM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

I am circling back to obtain information for our

community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 18 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Friday, August 11, 2023 at 03:11:49 PM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 17 times since then asking for more relevant information

related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Tuesday, August 1, 2023 at 09:58:24 PM PDT, Jennifer Dunaway <[jenniferd159@yahoo.com](mailto:jenniferd159@yahoo.com)> wrote:

Mr. Alo:

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 16 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who

has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors. What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Wednesday, July 26, 2023 at 10:04:32 AM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 15 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Wednesday, July 19, 2023 at 11:08:32 AM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 14 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if

you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors. What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Wednesday, July 12, 2023 at 12:16:01 PM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:  
I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no

scenarios or data queries on proposed numbers. I have emailed you 13 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise



who is. /R

On Friday, July 7, 2023 at 01:13:54 PM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:

I am circling back to obtain information for our community plan update. On May 8th, you provided me with data from 2015, but no scenarios or data queries on proposed numbers. I have emailed you 12 times since then asking for more relevant information related to this plan update scenarios, or at the very least, someone I can talk with about that if you are not the right person. Can you please respond or refer me to someone who has the answers?

At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

What is the plan to obtain new

traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Wednesday, June 28, 2023 at 12:12:27 PM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:  
I am circling back to obtain information for our community plan update. At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction,

ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors. What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

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If you are not the right person to answer the question, please advise who is. /R

On Tuesday, June 20, 2023 at 02:02:50 PM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:  
I am circling back to obtain information for our community plan update. At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

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engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

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If you are not the right person to answer the question, please advise who is. /R

On Thursday, June 15, 2023 at 03:22:24 PM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:  
I am circling back to obtain information for our community plan update. At this stage, the City should have this data. Since you have not responded, please advise who has this information so I can reach out to them. Your non-responses are not helpful.

If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based

on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

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Time is short. What is the plan for new count data, and scenario estimates for new LOS?

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If you are not the right person to answer the question, please advise who is. /R

On Friday, June 9, 2023 at 01:41:39 PM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:  
If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors.

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Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Wednesday, June 7, 2023 at 03:26:41 PM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:  
If you are not the person to contact for this information, please let me know who is. Your nonresponse to a concerned citizen based on your public presentation in February is noted. You provided your contact information, so I am assuming you are available from the City for contact and information. Please provide the information or refer me to someone who can.

Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors. What is the plan to obtain new traffic

count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is.  
/R

On Saturday, June 3, 2023 at 01:50:48 PM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:  
Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as



other factors.  
What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short.  
What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Thursday,  
June 1, 2023 at  
08:09:43 PM  
PDT, Jennifer  
Dunaway  
<jenniferd159@  
yahoo.com>  
wrote:

Mr. Alo:  
Circling back again as time is critical. As the transportation engineer assigned to work on this, I would like a response from you. Who else would I ask for this data?

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde

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This is a data  
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seen to date,  
Governor  
should remain  
as it is with  
limited  
improvements.

If you are not  
the right person  
to answer the  
question, please  
advise who is.  
/R

On  
Wednesday,  
May 31, 2023  
at 04:51:24  
PM PDT,  
Jennifer  
Dunaway  
<jenniferd159  
@yahoo.com  
> wrote:

Mr. Alo:  
Circling back again as time is critical.

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors. What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Tuesday, May 30, 2023 at 06:24:31 PM PDT, Jennifer Dunaway <jenniferd159@yahoo.com> wrote:

Mr. Alo:  
Circling back again as time is critical.

The data from 2015 is old and doesn't account for UTC remodeling, Coste Verde improvement traffic impacts, Standley Pool construction, ADU construction, surrounding area density increases impacting commuter cross traffic as well as other factors. What is the plan to obtain new traffic

count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R

On Monday, May 29, 2023 at 01:13:38 PM PDT, Jennifer Dunaway <jennifer.d159@yahoo.com>

wrote:

Mr. Alo:  
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traffic as well as other factors. What is the plan to obtain new traffic count data and translate that to an analysis with Scenario proposal population counts?

Time is short. What is the plan for new count data, and scenario estimates for new LOS?

This is a data driven process and based

on what I have seen to date, Governor should remain as it is with limited improvements.

If you are not the right person to answer the question, please advise who is. /R Jen Duna way

On Friday, May 12, 2023, 02:22:53 PM PDT, Jennifer Duna wa

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existing housing and zoning? What was the rationale? What other roads in San Diego have had this type of change based on similar data? Is there any traffic count data

more recent than 8 years ago? Have you done estimates (even preliminary) for the two scenarios in the community plan update and can you provide them?

Thank you,  
/R  
Jen  
Dunaway

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**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] schools UC Plan update comment and questions  
**Date:** Tuesday, April 16, 2024 10:42:18 AM

---

-----Original Message-----

From: Jennifer Dunaway <jenniferd159@yahoo.com>  
Sent: Thursday, April 11, 2024 7:50 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Cc: Andrea Contreras <andrea@sddirtlaw.com>; Bonnie Kutch <bkutch@kutchco.com>  
Subject: [EXTERNAL] schools UC Plan update comment and questions

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

Identify where the 1.8 recreation centers missing from the Plan will go. analyze and show any mitigation efforts associated with such in the DEIR. Identify why the one new recreation center at Torrey Pines was chosen based on new density and proposed locations of new units. Explain why a site far from any new housing units was chosen to be a recreation center. Show the analysis.

I30-22

Identify where the new elementary school(s) will be located in the Plan as identified by SDUSD in Appendix I2. The location SDUSD recommends is near La Jolla Village Drive and Genesee Avenue. Identify how the city will raise developer fees and build the school before the units are constructed per Appendix I2. Analyze and show mitigation efforts associated with this in the DEIR.

I30-23

/R Jen Dunaway



**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] comments on UC Plan and DEIR  
**Date:** Thursday, April 18, 2024 8:21:06 AM

---

-----Original Message-----

From: Jennifer Dunaway <jenniferd159@yahoo.com>  
Sent: Tuesday, April 16, 2024 9:03 PM  
To: Andrea Contreras <andrea@sddirtlaw.com>  
Cc: Bonnie Kutch <bkutch@kutchco.com>  
Subject: [EXTERNAL] comments on UC Plan and DEIR

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

Andrea:

Please send your presentation and comments to Chris Neilsen and Andy Weise as well as the City:  
[awiese@sdsu.edu](mailto:awiese@sdsu.edu)  
[cn@adsc-xray.com](mailto:cn@adsc-xray.com)  
[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)

and please copy myself and Bonnie

Thank you so much for your presentation!!!

130-24

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] comments on UC plan update and DEIR  
**Date:** Thursday, April 18, 2024 8:21:18 AM

---

-----Original Message-----

From: Jennifer Dunaway <jenniferd159@yahoo.com>  
Sent: Tuesday, April 16, 2024 8:36 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Cc: Chris Nielsen <cn@adsc-xray.com>; Andrew Wiese <awiese@sdsu.edu>  
Subject: [EXTERNAL] comments on UC plan update and DEIR

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

1. The EIR incorrectly states on page S 25 that public facilities cannot be identified and placed at this time. This is incorrect since the new density is already in the Draft Plan and known areas for more population is already identified in the Draft Plan. The school district actually pinpointed a location for a new school in Appendix I2. Other facilities including a new library, and 2.8 recreation centers can be located by the City as well based on the proposed density locations and the DEIR needs to place them and analysis needs to be done.

130-25

2. Governor Drive should remain as four lanes. The arguments to make it two lanes is not based on science. Governor Drive is not in a TPA and is only served by one bus route that does not go the entire length of the street. Community feedback has been overwhelming to keep it at four lanes. The City is still relying on 9 year old traffic count data in a DRAFT existing conditions assessment, known as Appendix A in the Mobility Report. There were many public comments on the need for updated traffic count data. This needs to be done.

130-26

3. The Shopping Center at Regents and Genesee (Sprouts Marketplace) is not in a TPA is two miles from the nearest Transit Center and should remain at current density levels. There is no justification for this strip mall to be changed to high density, just as any similar strip mall in San Diego City, that is on one minor bus route.

130-27

4. The emergency evacuation plan is flawed as it relies on current roadway and transportation systems to provide egress. The City is proposing to change most streets to less lanes and less egress, and the new evacuation plan needs to be studied under Plan proposal conditions.

130-28

5. The Community Preferred Scenario was active in July 2023 during the UCPG Subcommittee meeting. The City stripped it out of the DEIR without any notice or explanation. IT SHOULD BE IN THE DEIR as it was a scenario that the Subcommittee put forward. Redo the EIR with this alternative.

130-29

6. The UCPG Subcommittee in its July 2023 minutes, highlights that the City needs to identify funding and plans for infrastructure as a result of more density. The DEIR and the latest Draft Plan do not do this. This needs to be done, specifically the 910,000,000 that the School District highlights needs to be found for a new school BEFORE new units are built.

130-30

7. The Existing UC Plan states Community Goals. These were deleted from the Current Draft. Why? They need to be included. Community Engagement does not have any data on number of comments, what the comments were for and one on one meetings between Nancy Graham and special interest groups.

130-31

8. The Community Engagement piece also does not reference two Community Protests on March 11, 2023 and May 6, 2023 against the City preferred scenario, the May 16, 2023 lengthy HELP SAVE UC presentation, the April 6, 2023 Petition by UC PEEPS with specific comments on the Plan and how those comments were integrated into the latest Draft. This needs to be included and the comments need to be explained and weaved into the latest Draft.

130-32

9. The City Planner stated on 4/9/24 that police and fire had excess capacity. Provide the data to show this and show how the proposed population would be serviced by these services and what extra resources will be needed and where they will be placed. This is not shown in the plan as to where any new facilities will go near the new population increases happen and is not analyzed in terms of response times.

**I30-33**

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Fw: UC PEEPS" Comments on University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 8:57:35 AM  
**Attachments:** [2024 Draft Mobility Technical Report Review - April2024.docx](#)

---

**From:** Jennifer Dunaway <jenniferd159@yahoo.com>  
**Sent:** Friday, April 26, 2024 3:18 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Bonnie Kutch <bkutch@kutchco.com>; Burton, Zach <ZBurton@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Fw: UC PEEPS' Comments on University Community Plan Update Draft EIR

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

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Planning Department:

Note since July 2023, the City Planning staff removed the Community preferred scenario from discussion. Why? This should have been included in the DEIR as an alternative. There is no rational reason why it was not included since so much effort was placed into it and the subcommittee pushed it forward in July 2023.

This needs to be included as an Alternative in the DEIR.

I30-34

All of the comments below need to be integrated into the new draft EIR and UC Plan. V/R Jen Dunaway

----- Forwarded Message -----

**From:** University City Peeps <universitycitypeeps@gmail.com>  
**To:** "planningceqa@sandiego.gov" <planningceqa@sandiego.gov>  
**Cc:** "kentlee@sandiego.gov" <kentlee@sandiego.gov>; "tgalloway@sandiego.gov" <tgalloway@sandiego.gov>; "ctomlins@sandiego.gov" <ctomlins@sandiego.gov>; "slukes@sandiego.gov" <slukes@sandiego.gov>; "ncausman@sandiego.gov" <ncausman@sandiego.gov>; "joelacava@sandiego.gov" <joelacava@sandiego.gov>; "mayortoddgloria@sandiego.gov" <mayortoddgloria@sandiego.gov>; Andrew Wiese <awiese@sdsu.edu>; Chris Nielsen <cn@adsc-xray.com>  
**Sent:** Wednesday, April 24, 2024 at 02:57:44 PM PDT  
**Subject:** UC PEEPS' Comments on University Community Plan Update Draft EIR

I30-35

To Whom It May Concern:

On behalf of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, I'm submitting our combined comments on the University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using

I30-36

I30-37

the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. (See attachment with expert Traffic Analysis relative to Governor Drive.)

**I30-37  
cont.**

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

**I30-38**

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

**I30-39**

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

**I30-40**

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

**I30-41**

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

**I30-42**

**I30-43**

Sincerely,  
Bonnie Kutch, Resident of University City  
Founding Member of UC Neighbors for Responsible Growth, a.k.a. UC PEEPS, an  
Association of 500-plus University City Residents and Property Taxpayers

Bonnie Kutch | University City PEEPS | 619.299.1010

## **Review of University City Community Plan Update Draft Mobility Technical Report**

**dated March 2024 – (review conducted April 2024 by Charles Frasier(frasierf@ix.netcom.com))**

The Mobility Technical Report summarizes the physical and operational conditions of the planned mobility system outlined in the University Mobility Element. This report is one component of the University Community Plan Update, identifying the planned mobility improvements culminating with an analysis of all travel modes under the proposed plan horizon year of 2050.

The Proposed Plan is a strategy to address existing and forecast deficiencies related to the transportation system within the University community. It also strives to improve personal mobility through a balanced, multimodal transportation network, which supports the updated land use vision for University and aligns with the City’s General Plan, Blueprint SD, and Climate Action Plan (CAP). The mobility system is comprised of roadway and freeway system, pedestrian and bicycle infrastructure, and public transit.

### **Analysis Methodology**

Appendix A Existing Conditions Report describes the methodology used to determine the study area and analyze the transportation system for the University community. Since the adoption of the 2008 California Complete Streets Act (AB 1358), the City of San Diego has employed multimodal analysis procedures to assess mobility needs for pedestrians, cyclists, and transit users. **Analysis of the existing pedestrian, bicycle, transit, and vehicular system can be found in Appendix A.**

Vehicle Miles Traveled – SB 743 Analysis Senate Bill 743 (SB 743) was signed into law in September 2013, modifying the existing California Environmental Quality Act (CEQA) by removing auto delay, level of service (LOS), parking and other vehicular capacity measures as metrics of transportation system impacts for mixed-use, infill or transit-oriented development projects. Vehicle miles traveled (VMT) is considered the new analysis metric used to measure transportation impacts and must be incorporated by July 1, 2020, statewide. VMT reflects the land use type, intensity, and location in relation to the capacity and roadway connectivity of the transportation network. It is also influenced by the availability and quality of multimodal facilities, and system operations. VMT is metric that measures the number of vehicle trips generated and the length or distance of those vehicle trips. For transportation analysis, VMT is generally expressed in VMT per capita for a typical weekday. VMT does not directly measure traffic operations but instead measures the efficiency of the transportation system and is expressed as a function of population or employment.

**The VMT assessment for the University Community Plan Update, circa 2050, is discussed in Appendix B – Blueprint SD, University CPU, and Hillcrest FPA Vehicle Miles Traveled (VMT) Analysis.**

Roadway segments were assigned Level of Service (LOS) ratings of A through E as shown in Appendix A Table 2-16. LOS rating E is considered to be a roadway’s capacity. Average Daily Traffic (ADT) volumes exceeding LOS E are given LOS rating F. Threshold for Determination of a Significant Transportation VMT Impact are shown in Appendix B Table 3-1. **Projects with an LOS grade of F**

I30-44

exceed these thresholds and would have a significant adverse California Environmental Quality Act (CEQA) transportation impact.

## Results

**This review only addresses the results of the Roadway Segment Analyses for Governor Drive.**

Governor Drive functions as a two-way east-west, 4-lane Major Arterial with raised medians and a curb-to-curb width of approximately 68-80 feet. Governor Drive is lined with sidewalks and curbs on both sides of the street for the entire length of the street. Parallel parking is available on both sides of the street along most segments of the roadway west of Gullstrand Street. Class II bike lanes (no buffer) are partially present on both sides of the street between Genesee Avenue and Gullstrand Street. The posted speed limit is 35 mph. Access to I-805 is provided at the eastern terminus of Governor Drive. Existing conditions Average Daily Traffic (ADT) volumes for the roadway segments were provided by Accurate Video Counts Inc and measured in April and May 2015.

The University CPU plans to reduce the number of travel lanes from a 4-lane Major Arterial to a 2-lane Major Arterial on Governor Drive (West End to Greenwich Drive) to create a Complete Street consistent with City goals in the General Plan, CAP, Vision Zero, and Complete Streets Policy to encourage walking, biking, and taking transit. The plan includes continuous buffered bike lanes along Governor Drive, enhanced pedestrian and intersection treatments, and traffic calming measures, while maintaining on-street parking. Other improvements include a protected intersection at is found to be Genesee Avenue and Governor Drive. University CPU plan Average Daily Traffic (ADT) volumes for the roadway segments were determined from SANDAG's Series 14 Activity Based Model (ABM2+). An assumption of the analysis revealed by the figure in the executive summary of Appendix A is that there will be no growth of single occupancy vehicles (SOVs) from existing conditions to the University CPU plan conditions.

Table 7-4 of Appendix A shows the Existing Conditions Summary of the Roadway Segment ADT Based Analysis. From Regents Road to the I-805 SB Ramps, **Governor Drive is found to have a LOS E Capacity of 40,000 with an Average Daily Traffic (ADT) volume of 16,796 to 19,737. The v/c Ratio calculated by dividing the ADT volume by roadway segment's capacity is found to be 0.420 to 0.493 resulting in an acceptable Level of Service (LOS) rating of B.**

Table 3-11 of the Draft Mobility Technical Report shows the Roadway Segment Analysis – Proposed Plan Conditions Analysis. From Regents Road to the I-805 SB Ramps, **Governor Drive is found to have a LOS E Capacity of 20,000 with an Average Daily Traffic (ADT) volume of 22,480 to 32,140. The v/c Ratio calculated by dividing the ADT volume by roadway segment's capacity is found to be 1.124 to 1.607 resulting in an unacceptable Level of Service (LOS) rating of F.**

(The Plan v/c ratio is more than double the existing ratio due, in part, to the presence of traffic lights along the road segment.)

Because the analysis assumes that there will be no growth in SOVs from existing conditions to the University CPU plan conditions, the results of the plan analysis are applicable to the existing conditions if Governor Drive were, tomorrow, suddenly converted from a 4-lane Major Arterial to a 2-

I30-44  
cont.



lane Major Arterial with continuous buffered bike lanes, enhanced pedestrian and intersection treatments, and traffic calming measures, and a protected intersection at Genesee while maintaining on-street parking.

**The conclusion to be drawn from the Mobility Analysis is that converting Governor Drive from a 4-lane Major Arterial to a 2-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report.**

**I30-44  
cont.**

**From:** [Jennifer Dunaway](#)  
**To:** [PLN\\_PlanningCEQA](#)  
**Cc:** [Help Save UC](#); [Bonnie Kutch](#); [J Smith](#); [Judy Murphy](#); [MaryAnn Stewart](#); [Murphy Andreanna](#); [Andrew Wiese](#); [Chris Nielsen](#); [CouncilMember Kent Lee](#); [David Wright](#); [arden.karen@gmail.com](#); [arden.karen@gmail.com](#); [Tom Ruff](#); [Tomlins, Coby](#); [Galloway, Tait](#); [Paulette92122\\_](#); [Vonblum, Heidi](#)  
**Subject:** [EXTERNAL] Comments on UC Plan Update Draft and Draft EIR Apr 2024  
**Date:** Saturday, April 6, 2024 11:49:07 AM  
**Attachments:** [UC Plan Update DRAFT EIR comments April 2024.docx](#)

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Hello:

Attached are comments related to 1) General Comments, 2) Affordability, 3) Community Engagement and 4) Schools. Appendix I-2 was especially ignored in the Draft EIR discussion. Answers are expected in the public arena. Thank you, Jen Dunaway

I30-45

**General Comments:**

1. The City states that the UC Current Plan is at capacity. How is this defined and how is that measured? Compared to the last draft, this language was not utilized. Provide measured metrics and how University compares with other communities' measure. Provide information on what is capacity and what is above capacity. I30-46
2. These documents do not meet the requirements for CEQA. Specifically, Appendix G of the CEQA guidelines is "Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives? The City has not provided data and placement of new government facilities, environmental impacts, and impacts to response times and other objectives. The City needs to do this analysis and identify facilities and placement of said facilities in order to maintain acceptable service ratios, response times and other performance objectives such as LOS for streets for mobility. I30-47
3. The change in density at Governor and Regents shopping center is unacceptable since this is NOT a transit area and is only on one minor bus link. This was discussed in community meetings and the planning group supported change in the plan to lower density at Governor and Regents shopping center. The City needs to change this density to the suggested density by the Community Groups SAVE UC and UC PEEPS. I30-48
4. The City's argument about not having to measure LOS for streets service is weak and is intended only for transit areas. The area around Governor and Regents as well as Governor and Lakewood are not transit areas and should be analyzed for road usage and lane usage based on a variety of industry standard metrics such as LOS. I30-49
5. South UC is not an area served by Transit. Southwest UC in particular is only served by one minor bus route and is not a transit area, therefore using VMT as a sole metric for Street lane removals is not appropriate. Governor Drive should stay as four lanes and LOS and other common measures should be utilized to analyze Governor and other streets in UC. I30-50
6. At no community meeting from May 2022 to December 2023 did the City staff mention that the Hillcrest EIR would be part of the UC EIR. Why was this not mentioned and kept a secret from the public? This greatly complicates the analysis and public comment period, yet Coby Tomlins refused to extend the comment period. Why and why? I30-51
7. The City mentions in the Draft that as land becomes available for purchase the City will entertain buying it for community use. This is not the intent of Appendix G of CEQA and is unacceptable planning. Sites need to be identified at the time of the project implementation (Plan Update) to ensure mitigation measures are in place for future use. Schools, Fire Stations, Recreation Centers, and Parks need to be identified in the Plan per Appendix G of CEQA. I30-52
8. Figure 3-25 in the Draft EIR should show 2.8 new recreation centers and new park space. There is only one new recreation center on the map at the northern end of the UC planning area, close to Del Mar. This is not where all the population growth is planned and does not meet the 2.8 requirement. Per Appendix G of CEQA, sites need to be identified at the time of plan implementation to ensure mitigation measures will be sufficient. The City needs to identify these sites now. The City's mention of 'buying some sites up for sale in the future' is not adequate planning and is a do-nothing approach and not acceptable per CEQA. I30-53

- 9. In 1976, homeowners in South UC voted to pay a fee to add recreation center amenities and facilities. This agreement was worked via the City of San Diego. The City should charge fees for any new units built to fund additional recreation centers based on precedent. What does the City say about this?

**I30-54**
- 10. During the Public Comment Period from May 2022 to December 2023, public comments were made and endorsed by the Planning Group to have any new development include onsite parks and public space. This needs to be codified in the updated Plan.

**I30-55**
- 11. Figure 4.12 C shows two fire stations in South UC. There are no fire stations in South UC. Fire response times need to be analyzed for today and what they would in with the Plan Implementation. Per Appendix G of CEQA, Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives? The City needs to identify this and correct the map in this document. In addition, most common scenarios for fire egress need to be discussed with the “project” of this Plan. I.e. how will the increase in population egress from South UC during a fire in either Rose or Tecolote Canyons?

**I30-56**
- 12. Page 4.12-18 discusses police coverage. The Draft EIR does not discuss what the mitigation measures are to account for the Plan growth of population and where additional police coverage will go and effect on response times. The Draft EIR only discusses the no alternative option in the sense of what the current police coverage is. This is unsatisfactory.

**I30-57**
- 13. Page 4.12-28 discusses the need for an additional public library in UC. The document does not provide a location or where the funding would come from or when it should be built. The Draft only mentions remodeling the existing libraries. This is unsatisfactory.

**I30-58**
- 14. The Current UC Community Plan states “Provide a workable circulation system which accommodates anticipated traffic without reducing the Level of Service below “D.”” This Plan discards this community goal. This is a community goal that should be included in the Plan or discussed. Why was it discarded and by whom? What is the barrier to having it included in the new Plan?

**I30-59**

**Draft Affordability Housing Report:**

1. Many public comments in meetings from May 2022 to December 2023 reflected on the current low rent older apartment complexes in North UC. The comments made were to preserve those as much as possible, and prevent gentrification and the obliteration of those units with high end, luxury high rises. This is happening current at eh corner of Cargill Drive and Nobel Drive. The Plan should have language requiring and supporting the preservation of these few low rent, older apartments in UC. It does not mention this and the draft engagement report does not include these multiple comments from the public during public input in 2023.

2. The report does not have specific recommendations to be placed in the plan. The community comments from May 2022 to December 2023 that were recorded specifically stated that inclusionary low-income housing units should be built on site along with any new development. The report does not reflect these public comments or how to support and promote this particular model.

**Draft Engagement Summary Report:**

1. Page 11: City states “Leaving the 1987 University Community Plan unchanged does not meet the City’s housing and climate goals, which are identified in the General Plan, Climate Action Plan, and other

adopted policy documents. The current plan is at capacity and therefore is in need of updating.” The City’s goals for housing should be inclusive of all 52 community areas, not simply UC and a few others. What is UC’s fair share of the SANDAG’s housing goals for the City of San Diego? The goal is much smaller for a community of UC, one of 52 community areas in the City. The current plan is not at capacity, when the City cannot explain how that is measured and defined. UC has had rapid growth since 1987 and continues to have new projects proposed and built (Nobel Drive and Cargill condos, Coste Verde Redevelopment, etc.). What capacity is the Plan at, and how is that measured? What are the capacities of the other Community Plans and how does the City determine which Plans are ‘at capacity’ and need to be updated? There are 16 other Community Plans that are older than UC; what are their capacities? This is not rationale and should be explained. The 1987 Plan has served the community well and is not ‘at capacity”. The community should absorb growth based on the fair share (1 of 52 communities) within the City.

2. The priorities listed on page one of the Community Engagement Report are all City of San Diego priorities. The 1987 Plan contains “Community Priorities”. Where are the community priorities based on the thousands of public comments received? Why did the City discard the 1987 Community Priorities and Values? These need to be placed back into this document.

3. The Community Engagement Report does not include a spreadsheet or database of all the public comments received. Where are they? How did the City staff devise these generalized statements? Based on what? If 1000 comments were received, how were they grouped together by topic and developed into community concerns? Where is the data?

4. The community engagement report makes no mention of the multiple public protests and signed petitions that were provided to the City. These were major events with major concerns noted with details, yet they are ignored by the Planning Department. These need to be included and the premise for the protests and the petitions concerns need to be evaluated.

5. Existing Community Plan goals:

D. Preservation and Enhancement of Established Neighborhoods 1. Establishment of performance standards to guide the conservation of valued existing neighborhood characteristics. 2. Encouragement of private finance mechanisms for preservation of established neighborhoods. 3. Encouragement of infill within City neighborhoods where vacant land and adequate public facilities exist.

Overall Community Goals 1. Foster a sense of community identity by use of attractive entry monuments in private developments. 2. Create a physical, social and economic environment complementary to UCSD and its environs and the entire San Diego metropolitan area. 3. Develop the University area as a self-sufficient community offering a balance of housing, employment, business, cultural, educational and recreational opportunities. 4. Create an urban node with two relatively high-density, mixed-use core areas located in the University Towne Centre and La Jolla Village Square areas. 5. Develop an equitable allocation of development intensity among properties, based on the concept of the “urban node.” 6. Provide a workable circulation system which accommodates anticipated traffic without reducing the Level of Service below “D.”

Note these are valid community goals; why are they being thrown out without comment? The last item about Level Of Service for our roads is a direct contradiction to the City’s proposal to allow all of our

I30-61  
cont.

roadways to degrade to C D and F with no consequence, with the flawed assumption that people will somehow stop using their vehicles. What studies actually suggest this will happen? What data is provided that this will actually occur? The community goals need to be integrated into the community plan and not be obliterated by the City of San Diego.

6. The UC Planning meetings specifically made recommendations that adopted those put forth by the group "Help Save UC". Why did the City not listen to the Community and threw out all of these recommendations?

7. The Community Engagement section makes no mention of the large community groups, HELP SAVE UC and UC PEEPS, which have hundreds of members who made official comments and petitions. These groups provided valuable input and recommendations. The City put forth none of these recommendations in their latest Draft. Why? Why no mention of these groups and their recommendations and suggestions?

8. Page 4.12.11 discusses fire station placement in UC. It does not provide current response times as compared to targets. The Draft EIR does not provide details on proposed response times and mitigation measures to ensure continued level of service.

9. Page 4.12.18 discusses police service. The Draft EIR does not discuss plans for mitigation to ensure continued level of service for UC. The draft only discusses what the UC area currently has. It does not provide any detail on impacts to the UC area with more population and how the Police will adjust and effects on response time.

#### **Appendix I-2, Draft EIR UC Plan Schools:**

1. Re: Appendix I-2: The School district states "Implementation of the University Community Plan Update will likely require significant expansion of existing school facilities, or construction of new facilities, at the elementary level. The district does not currently have any long-range facility plans that could possibly accommodate the estimated number of generated students. Land for new schools should be set aside in the University Community Plan Update. In particular, land for new schools is likely to be needed in the north section of the University area, in the vicinity of La Jolla Village Drive and Genesee Avenue intersection."
2. Further, the school district states "The specific question from Appendix G of the CEQA guidelines is "Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for [Schools]."
3. The City has not identified land for this and needs to in the Plan. In addition, the City has not met the requirement for Appendix G of CEQA as of yet in this Draft. This needs to be met.
4. Page 603 of the Draft EIR discusses schools in UC, but does not mention this memo from the District or where resources would be identified. The EIR is insufficient and does not discuss impacts or plans to mitigate. The City is purposely trying to ignore the School District concerns and needs in the Draft EIR. The City needs to fix the EIR to reflect mitigation measures per CEQA.

**I30-61  
cont.**

**I30-62  
cont.**







**From:** [Jennifer Dunaway](#)  
**To:** [PLN PlanningCEQA](#); [PLN University Community Plan Update](#)  
**Cc:** [Chris Nielsen](#); [Andrew Wiese](#); [Help Save UC](#); [CouncilMember Kent Lee](#); [Bonnie Kutch](#)  
**Subject:** [EXTERNAL] comments on Draft UC Plan and DEIR  
**Date:** Monday, April 29, 2024 8:36:55 AM

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Greetings;

Regarding fire and emergency egress in case of emergency, the City EIR states that existing roadways can handle adequate egress in case of emergency or fire emergency with the proposed new population increase. This is wrong, since in the same document the City is proposing to reduce most street lanes from 4 to 2, hindering escape. There needs to be an analysis with the downgraded streets and increased population on emergency egress.

I30-63

Lastly, disturbingly, City Planning staff did not include the Community Preferred Scenario in the Draft EIR for study. Most EIRs have a few 'alternatives' to study and provide the 'decision maker' with choices on the way to move forward. This EIR essentially only has the "City Preferred Scenario" to study. As late as July 2023, the UCPG's subcommittee was studying both of these Scenarios and moving them both forward. Sadly, most of the comments from the community were integrated into the Community Preferred Scenario. Now the City Planning staff essentially throws that one away and uses the City Preferred Scenario as the way forward. Essentially all of the Community Comments are thrown in the trash and were for naught. We have asked why, and the best answer we got from Ms. Suchi Lukes, City Planner at the 9 April meeting was "that is a great question, we'll have to regroup on that to answer". WHY? It should be in the DEIR as an alternative.

I30-64

/R Jen Dunaway

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**I30: Responses to Jennifer Dunaway Comment Letter**

**I30-1:** See response to comment O13-1 under comment letter O13.

**I30-2:** See response to comment O13-2 under comment letter O13.

**I30-3:** See response to comment I8-7 under comment letter I8.

**I30-4:** The Draft Program Environmental Impact Report (PEIR) acknowledges that the proposed project has significant impacts related to public services. As identified by the commenter, this information is found in the table summarizing the environmental impacts (Table ES-1) on page S-25. It is also discussed in Section 4.12.4 of the Draft PEIR. The specific locations, sizing, and capacity of future public service development projects (e.g., schools, police and fire stations, and libraries) are not known at this time. This level of review is acceptable for a PEIR. Section 21065.5 of the California Environmental Quality Act (CEQA) Statutes describes “tiering” as a review of “general matters and environmental effects in an environmental impact report prepared for a policy, plan, program,” followed by “narrower or site-specific environmental impact reports, which incorporate by reference the discussion in any prior environmental impact report and which concentrate on the environmental effects which (a) are capable of being mitigated, or (b) were not analyzed as significant effects on the environment in the prior environmental impact report.” If future development projects would result in potentially significant impacts not addressed in this PEIR, then a separate environmental review would be required.

See response to comment O13-4 under comment letter O13 in regard to the concern about the provision of school facilities in the University Community Plan Update (CPU) area.

**I30-5:** See response to comment O13-3 under comment letter O13.

**I30-6:** See response to comment O13-5 under comment letter O13.

**I30-7:** See response to comment I13-3 under comment letter I13.

**I30-8:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I30-9:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the PEIR. No further response is required.

**I30-10:** Figure 3-25 shows the existing and proposed recreation centers, along with existing and proposed park space. As described in Section 4.13.4, Issue 1 and Issue 2, of the PEIR, impacts related to the need for additional recreation centers is considered significant. As future development is proposed, individual private developments would be required to either pay Citywide Park Development Impact Fees or provide public parks consistent with San Diego Municipal Code Section 142.0640(b)(8)(A-F), as detailed in Section 4.13.2.2c. Without knowing where these future improvements would be located, the type and extent of the impacts resulting from providing these facilities, and to what extent these future facilities would be able to accommodate increases in demand for recreational facilities, the environmental impact remains significant.

**I30-11:** The comment indicates there is an email attachment with comments on the Draft Mobility Report, which was prepared to inform mobility decisions for the University CPU, but is not part of the University CPU, and was not analyzed in the PEIR. No further response is required.

**I30-12:** The comments are on the Draft Mobility Report which was prepared to inform mobility decisions for the University CPU, but it is not a part of the University CPU, was not analyzed in the Draft PEIR, and is not one of the reports for the Draft PEIR. The traffic analysis of the Draft PEIR relied on a Vehicle Miles Traveled Analysis (VMT), which is included as Appendix J to the PEIR. The comments on the Draft Mobility Report have been noted.

**I30-13:** See response to comment O13-4 under comment letter O13 .

**I30-14:** See response to I30-4. The comment about identifying the general locations in need of facilities based on density is noted. Planning for future facilities requires coordination between the various City departments as well as with the San Diego Unified School District. These actions are addressed in the University CPU Plan Policies 7.1(A–B), 7.2(A–B), and 7.3(A–H).

**I30-15:** See response to comment O13-5 under comment letter O13.

**I30-16:** See response to comment O13-5 under comment letter O13.

**I30-17:** See response to comment I30-10. The commenter mentions a proposed recreational facility on Torrey Pines. They perhaps mean the Scripps Shiley Sports and Fitness Center on North Torrey Pines Road. The University CPU identifies this area as a potential site for a new and/or expanded facility on Figure 26 (Figure 3-25 of the Draft PEIR). While this site is not near residential development, it could feasibly serve employees in that area, which would be consistent with University CPU plan policy 1.3(B): “Encourage office development that includes strategies accommodate changes in workforce styles and needs. Promote the locating office uses within high-quality office districts where workers have access to restaurants, services, and outdoor recreation.”

**I30-18:** See response to comment O13-4 under comment letter O13.

**I30-19:** The comment includes a letter dated March 20, 2023, that was sent to Mayor Todd Gloria, Planning Director Heidi Vonblum, Program Manager Nancy Graham, and Senior Traffic Engineer Leo Alo. The comments in the letter are on the University CPU, and the commenter is asking why these comments were not included in the Draft Engagement Summary Report. The comment has noted by the City. As it does not raise an issue related to the adequacy of the analysis in the Draft PEIR, no further response is required.

**I30-20:** The environmental impacts of the projected increase in traffic are discussed in Section 4.14, Transportation, of the PEIR. Since the passage of Senate Bill 743 in 2018, CEQA Guidelines Section 15064.3 no longer uses auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. This applies to any CEQA project, as defined by Section 21065 of the CEQA Statutes:

“Project” means an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and which is any of the following:

- a) An activity directly undertaken by any public agency.
- b) An activity undertaken by a person which is supported, in whole or in part, through contracts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- c) An activity that involves the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies.

The proposed Blueprint SD Initiative, University CPU, and Hillcrest FPA is the proposed project per CEQA since the proposed land use frameworks and policies are a collective activity taken by the City to update its General Plan and meet its Climate Action Plan goals.

VMT is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020. The traffic analysis of the PEIR relies on the Vehicle Miles Traveled Analysis, which is included as Appendix J to the PEIR. The Draft Mobility Report is not part of the University CPU and was not analyzed in the PEIR. The comment about the opposition to the proposed improvements to Governor Drive are noted.

**I30-21:** This comment is a chain of emails from the commentor to the City's traffic engineering staff dating between May, 2023, through March, 2024. The emails are requesting information regarding the traffic count data for University CPU and various projects that are not a part of this proposed project. The correspondence has been noted; since these are not comments on the adequacy of the Draft PEIR, no further comment is necessary.

**I30-22:** See response to comment I30-10 and I30-17.

**I15-23:** See response to comment O13-4 under comment letter O13.

**I30-24:** The comment is a request for presentation slides and does not have any comments on the PEIR. No response is necessary.

**I30-25:** See responses to comment I30-4 and I30-10.

**I30-26:** See responses to comment I30-1 and I30-2.

**I30-27:** See response to comment I8-7 under comment letter I8.

**I30-28:** See response to comment O13-3 under comment letter O13.

**I30-29:** See response to comment O13-5 under comment letter O13.

**I30-30:** See response to comment I13-3 under comment letter I13.

**I30-31:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I30-32:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I30-33:** See the response to comment I30-4.

**I30-34:** See response to comment O13-5 under comment letter O13.

**I30-35:** The commenter introduces their comments on the Draft PEIR and on the University CPU.

**I30-36:** See response to comment O13-1 under comment letter O13.

**I30-37:** See response to comment O13-2 under comment letter O13.

**I30-38:** See response to comment O13-3 under comment letter O13.

**I30-39:** See response to comment O13-4 under comment letter O13.

**I30-40:** See response to comment O13-5 under comment letter O13.

**I30-41:** See response to comment O13-6 under comment letter O13.

**I30-42:** See response to comment O13-7 under comment letter O13.

**I30-43:** Comment noted. The Complete Communities program is not a part of the scope of the project analyzed in the Draft PEIR and the environmental impacts of the Complete Communities program were analyzed in the Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). The comment does not raise an issue related to the adequacy of the analysis in the PEIR. No further response is required.

**I30-44:** This is a comment on the Mobility Technical Report, which was prepared to inform mobility decisions for the University CPU, but is not part of the University CPU, and was not analyzed in the PEIR. No comments are necessary.

**I30-45:** The commenter introduces comments on the University CPU and the PEIR.

**I30-46:** Comment noted. As this is a comment on the University CPU, and not on the adequacy of the PEIR, no additional comments are necessary.

**I30-47:** Impacts to public services and facilities is discussed in Section 4.12 of the Draft PEIR. See the response to comment I30-4.

**I30-48:** See response to comment I8-7 under comment letter I8.

**I30-49:** See response to comment I30-20.

**I30-50:** A goal of the University CPU is to expand alternative mobility options in an effort to meet CAP and General Plan policies regarding greenhouse gas emissions. While not all of South University City is within a Transit Priority Area, portions of it are. In response to the comment about VMT and Governor Drive, see the response to comment O13-1 under comment letter O13.

**I30-51:** In response to the comment about the inclusion of multiple community plan updates being analyzed under one PEIR, see the response to comment O13-6 under comment letter O13.

CEQA Guidelines Section 15105 indicate that the public review period for a Draft Environmental Impact Report (EIR) submitted to state agencies for review shall not be less than 45 days. The intention of the 45-day public review process for a Draft EIR is for the lead agency to give individuals, local agencies, and state agencies, adequate time to review and comment on the EIR, so that the Lead Agency can consider these comments and then provide responses as necessary in the Final EIR. All comments and questions posed by the commenters are noted and considered by the City of San Diego as the lead agency.

**I30-52:** See response to comment I30-4 for a discussion of how tiered EIRs analyze the environmental impacts at a program and project level. See also response to comment O11-11 under comment letter O11 as it relates to tiered environmental analysis.

**I30-53:** See the response to comment I30-10.

**I30-54:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the PEIR. No further response is required.

**I30-55:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the PEIR. No further response is required.

**I30-56:** Figure 4.12-1c of the Draft PEIR had incorrect information regarding fire station locations. This information has been corrected for the Final PEIR. The nearest station to south University City is the station at the intersection of Nobel Drive and Shoreline Drive. Response times for police and fire services are measured and analyzed in section 4.12 of the Draft PEIR. See Tables 4.12-4 for the San Diego Fire Department's performance indicators for 2021. As determined in 4.12.4 Issue 1(a), future development in accordance with the land use framework of the proposed project, including University CPU, would result in an increase in building square footage and population, which would create a greater demand for fire emergency services. As the location and need for potential future facilities cannot be determined at this time, the nature and extent of these impacts is unknown, and impacts related to police and fire services are significant. . See response to comment O13-3 under comment letter O13 in regard to the concern about emergency access.

**I30-57:** The most recent data for police response rates is listed in Table 4.12-6 of Section 4.12 of the PEIR. Under the impact analysis (Section 4.12.4, Issue 1b), police services would need to be expanded as a result of future development of the University CPU area. As this is a programmatic review, the specific details of future police stations are not known, so the impacts are considered significant.. See response to comment I30-4 for a discussion of EIR tiering.

**I30-58:** The mention of new and expanded library buildings on page 4.12-28 of the PEIR is in reference to the information about future library needs in the City's Library Master Plan. The Library Master Plan recommends the renovation and expansion of the existing 16,000-square-foot North University Community Library to 25,000 square feet and the replacement of the existing 10,000-square-foot University Community Library on the same site with a larger 25,000-square-foot library facility. As with other public service-related impacts, these program-level impacts are considered significant. . See response to comment I30-4 for a discussion of service-related impacts and tiered environmental review.

**I30-59:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I30-60:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I30-61:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I30-62:** See response to comment O13-4 under comment letter O13.

**I30-63:** See response to comment O13-3 under comment letter O13.

**I30-64:** See response to comment O13-5 under comment letter O13.

## Comment Letter I31 - Julia Engstrom

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: My opinion and vote.  
**Date:** Tuesday, April 30, 2024 9:29:34 AM

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-----Original Message-----

From: Julia Engstrom <[julia@juliaengstrom.com](mailto:julia@juliaengstrom.com)>  
Sent: Monday, April 29, 2024 9:07 PM  
To: PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
Subject: [EXTERNAL] My opinion and vote.

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Dear planners and elected officials

Please do not reduce the lanes on Governor Drive in university City.  
We are not happy with the proposed bike lane overhaul.  
Julia Engstrom  
5618 Quidde Court 92122

Sent from my iPhone

I31-1



**I31: Response to Julia Engstrom Comment Letter**

**I31-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I32 - Susan Enos

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.  
**Date:** Tuesday, April 30, 2024 8:56:28 AM

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**From:** Susan Chelsea <[femnesq88@gmail.com](mailto:femnesq88@gmail.com)>  
**Sent:** Friday, April 26, 2024 1:40 PM  
**To:** [PLN\\_PlanningCEQA <planningceqa@sandiego.gov>](mailto:planningceqa@sandiego.gov)  
**Cc:** Gloria, Todd <[MayorToddGloria@sandiego.gov](mailto:MayorToddGloria@sandiego.gov)>; CouncilMember Joe LaCava <[JoeLaCava@sandiego.gov](mailto:JoeLaCava@sandiego.gov)>; CouncilMember Kent Lee <[KentLee@sandiego.gov](mailto:KentLee@sandiego.gov)>  
**Subject:** [EXTERNAL] Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

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To Whom It May Concern:

Below is a summary of the shortcomings of the DPEIR. I want to add additional comments that it is clear the City is purposely not following the required legal process because it knows the results will be devastating to the City's efforts to over-build the University City/UTC area.

The DPEIR process is in place so that stakeholders, decision makers, and the community can make decisions based on full and accurate information. The City has made it clear it wants to overbuild the area at any cost, and is only going through the motions of the approval process as has been evident throughout the entire process.

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant

I32-1

I32-2

environmental effect of a project.

The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.

The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project.

The appropriate way to do that would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn't feasible.

Finally, the City's conclusion that the High Density Alternative was the environmentally superior alternative isn't supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment.

Furthermore, the City's own conclusion states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Section 8.2.3, underline added.)

The City should revise the DPEIR to address these issues.

Susan Enos

I32-2

cont.

I32-3

I32-4

I32-5

I32-6

I32-7

**I32: Response to Susan Enos Comment Letter**

**I32- 1:** The comment is an introduction to the letter. No response is required.

**I32- 2:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I32- 3:** See response to comment I11-3 under comment letter I11.

**I32- 4:** See response to comment I11-4 under comment letter I11.

**I32- 5:** See response to comment I11-5 under comment letter I11.

**I32- 6:** See response to comment I11-6 under comment letter I11.

**I32- 7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I33 - Anthony Filippone

**From:** [Anthony Filippone II](#)  
**To:** [PLN\\_PlanningCEQA](#)  
**Subject:** [EXTERNAL] University city plan  
**Date:** Thursday, March 14, 2024 7:55:22 PM  
**Attachments:** [IMG\\_4152.jpeg](#)

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Why would you redesignate open space behind a handful of multimillion dollar homes?

**I33-1**

You are creating a fire hazard where there was never one.

**I33-2**

You will be to blame when our home insurance is canceled due to Now being in a fire zone. Or worse, when they burn down!

**I33-3**

This “open space” was a maintained golf course before the backroom deals got the zoning changed.

**I33-4**

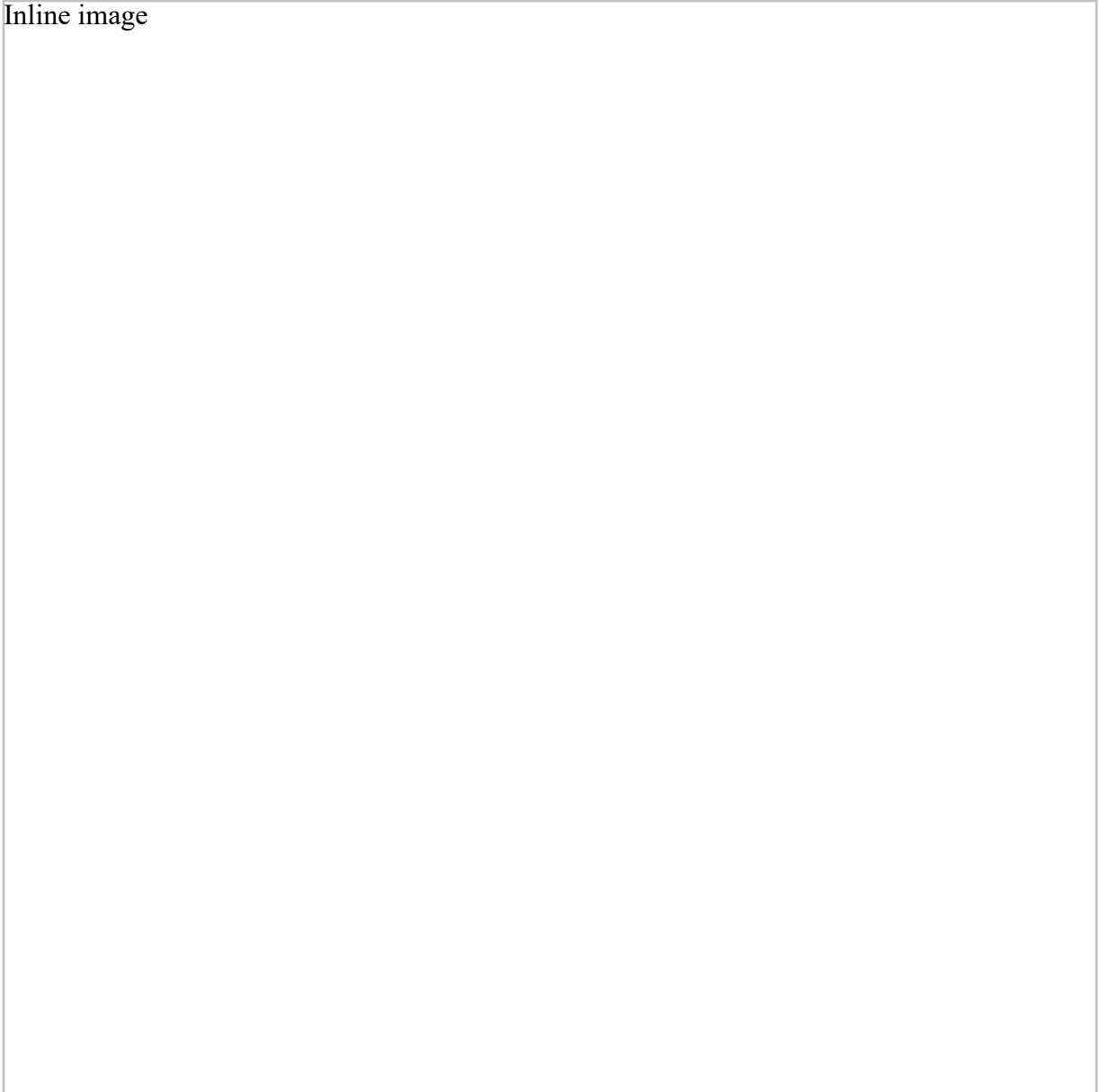
“Open Space

This designation maintains areas of undeveloped canyons and hillsides which can contain environmentally sensitive resources.”

**I33-5**

FIRE HAZARD FIRE HAZARD FIRE HAZARD

Inline image



**I33: Response to Anthony Filippone II Comment Letter**

**I33-1:** The University Community Plan Update (CPU) does not include the redesignation of open space. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft Program Environmental Impact Report (PEIR).

**I33-2:** As shown in Figure 4.18-5 and detailed in Table 4.18-4 of the Draft PEIR, the majority of the University CPU area is located in a very high fire hazard severity zone. Approximately 6,836 acres of the University CPU area is located in a very high fire hazard severity zone. The proposed project would not change the existing very high fire hazard severity zone.

**I33-3:** Comment noted. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft PEIR. No further response is required.

**I33-4:** Comment noted. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft PEIR. No further response is required.

**I33-5:** This comment does not raise an issue related to the adequacy of the analysis contained within the Draft PEIR. Please see response to comment I33-2.

## Comment Letter I34 - Marcia Fisher

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University City Density Increase Plans Objection  
**Date:** Tuesday, April 30, 2024 8:41:18 AM

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**From:** mawf41@gmail.com <mawf41@gmail.com>

**Sent:** Thursday, April 25, 2024 5:29 PM

**To:** CouncilMember Kent Lee <KentLee@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>; ncausman@sandiego.gov; tomlins@sandiego.gov; Lukes, Suchitra <SLukes@sandiego.gov>

**Subject:** [EXTERNAL] University City Density Increase Plans Objection

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Dear San Diego County Residents Representatives,

As a long-standing University City resident, I am contacting you to express my objections regarding several areas of concern from the City's recent Environmental Impact Report, some of which were already rejected by UC residents when the 'Housing Action Plan' which was part of State Bill 10 that failed to pass in August 2023. Here are just some key concerns:

I34-1

### Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I34-2

I34-3

I34-4

### Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I34-5

### New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project

I34-6



will only increase traffic gridlock along Genesee during certain times of the day. Also, there are already several high-rise residential projects that have been built in the small radius of UTC space over the last 10-20 years. It has increased the density tremendously while taking away needed infrastructure. I used to be able to walk to the grocery store. Now, I have to get in my car and fight traffic to get to the grocery store while also dealing with a bunch of college students. We do not want or need more high rise residential in this area because UCSD wants more housing for their students. Millions were spent on a trolley system to allow people to live in different parts of the county and get to work via mass transportation or vice versa. Let's put that project to work in other areas of the county for this underutilized resource. As an alternative, other areas closer to Hwy 52 that have several older apartment and condos should be redeveloped before anything else is added or developed in UTC.

I34-6  
cont.

### **Vons & Sprouts Centers New Height and Sharply Higher Density Allowances**

The planned, sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas. This is NOT acceptable. We, **the people**, have already voted this down!

I34-7

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

### **Planning Deficiencies in Parks**

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not “greenways” or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans.

I34-8

The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas. This is NOT acceptable!

**In summary**, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

I34-9

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

I34-10

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

I34-11

Marcia Fisher

Cambridge Terrace HOA

**I34: Response to Marcia Fisher Comment Letter**

**I34-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted and no further response is required.

**I34-2:** See response to comment I8-2 under comment letter I8.

**I34-3:** See response to comment I8-3 under comment letter I8.

**I34-4:** See response to comment I8-4 under comment letter I8.

**I34-5:** See response to comment I8-5 under comment letter I8.

**I34-6:** See response to comment I8-6 under comment letter I8.

**I34-7:** See response to comment I8-7 under comment letter I8.

**I34-8:** See response to comment I8-8 under comment letter I8.

**I34-9:** The comment generally addresses overall concerns with the proposed University Community Plan Update. It does not address the adequacy of the environmental analysis in the Draft PEIR. The concerns have been noted; no further response is necessary.

**I34-10:** The comment is about a previous project that is not a part of the project evaluated in the Draft PEIR. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

**I34-11:** The comment has been noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I35 - Mike Frattali

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University CiCoommunity Plan Update  
**Date:** Tuesday, April 30, 2024 9:15:49 AM

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**From:** Mike Frattali <mjfrattali@yahoo.com>  
**Sent:** Monday, April 29, 2024 8:49 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] University CiCoommunity Plan Update

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The current University City Plan is unacceptable.

I35-1

The plan to take Governor down to two lanes (one lane each way) will increase traffic and pollution. It will also present a grave safety risk in the event the community needs to evacuate during a fire. There are better was to promote safety and transit options.

I35-2

It also allows for too much residential housing density in north and south UC.

I35-3

Please contact me if you have any questions.

I35-4

Regards,

Mike Frattali  
University City

**I35: Responses to Mike Frattali Comment Letter**

**I35-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I35-2:** See response to comments O13-1 and O13-3 under comment letter O13.

**I35-3:** Comment noted. See response to comment O15-5 under comment letter O15. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I35-4:** Comment noted.

## Comment Letter I36 - Gail Freidt

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Hillcrest Focused Plan Amendment - Extend the Draft Plan's one-way configuration of University Avenue from First Avenue to Washington Street  
**Date:** Thursday, April 11, 2024 11:47:02 AM

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**From:** Gail Friedt <gail.friedt@gmail.com>  
**Sent:** Wednesday, April 10, 2024 12:21 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Hillcrest Focused Plan Amendment - Extend the Draft Plan's one-way configuration of University Avenue from First Avenue to Washington Street

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Hello, my name is Gail Friedt, a concerned resident who lives at First and University, and a founding member of Vibrant Uptown. I believe it is important to provide safe bike infrastructure for all ages and abilities on West University Ave.

I36-1

The Hillcrest Focused Plan Amendment leaves a crucial gap in the regional bikeway network on West University Ave. With high vehicle volumes posing safety risks, especially near Florence elementary school, urgent action is needed.

I36-2

Please extend the one-way configuration from First Avenue to Washington Street, creating space for a protected bikeway. This revision ensures safe mobility for all users and closes the cap in the complete streets network. We need safe biking for everyone in our community.

I36-3

Sincerely,

Gail Friedt

**I36: Responses to Gail Freidt Comment Letter**

**I36-1:** The commenter provides introductory language regarding the content of this comment letter. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft Program Environmental Impact Report (PEIR).

**I36-2:** This comment does not raise an issue related to the adequacy of the analysis contained within the Draft PEIR.

**I36-3:** This comment does not raise an issue related to the adequacy of the analysis contained within the Draft PEIR.

## Comment Letter I37 - Jenn French

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on Draft Hillcrest Focused Plan Amendment  
**Date:** Thursday, April 11, 2024 11:46:46 AM

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**From:** Jenn French <jenn.m.french@gmail.com>  
**Sent:** Wednesday, April 10, 2024 5:11 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Comments on Draft Hillcrest Focused Plan Amendment

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Hello,

I am a longtime Hillcrest resident and wish to comment on the Focused Plan Amendment. I appreciate the work going into the plan and, importantly, preserving the character of Hillcrest.

I37-1

I would like to see the City focus on affordable housing. The new apartments next to Number One Fifth Avenue range in price from \$2,450 per month for a studio to \$4,889 per month for a large two-bedroom apartment. These prices are absurd and are unaffordable for many members of the LGBTQ+ community. There are several other luxury buildings under construction and more to come. I fully support building up and building large units, but we should be focused on housing that regular people can afford. Building a luxury building with a handful of low income units does not serve our community. We need housing for regular folks.

I37-2

I would also like the City to reconsider the plans for additional bike paths. Fourth and Fifth Avenues are extremely chaotic and dangerous. It's difficult to cross the streets and you cannot see bikers coming, assuming that any of them actually use the bike lanes. I understand the City wants people to walk and bike, but that is not the reality for the majority of folks. My husband and I share a car but without trolley access Hillcrest is not realistically a place where people can live car-free.

I37-3

Finally, we need more public bathrooms that are open for our unhoused neighbors. The only public bathroom within a mile of our home is the Mission Hills/Hillcrest Public Library Branch, and it's not open 24 hours a day. This is a huge problem in our community.

I37-4

Thank you,

Jenn

—

**Jenn French**

Pronouns: She/Her/Hers

mobile: 858.205.4119 • [jenn.m.french@gmail.com](mailto:jenn.m.french@gmail.com)

*"When we speak we are afraid our words will not be heard or welcomed."*



*But when we are silent, we are still afraid.  
So it is better to speak.” ~ Audre Lorde*

**137: Response to Jenn French Comment Letter**

**137-1:** The commenter provides introductory language regarding the content of this comment letter. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft Program Environmental Impact Report (PEIR). No further response is required.

**137-2:** Comment noted. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft PEIR. No further response is required.

**137-3:** Comment noted. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft PEIR. No further response is required.

**137-4:** Comment noted. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft PEIR. No further response is required.

## Comment Letter I38 - Ed Friedman

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] UC proposal  
**Date:** Tuesday, April 30, 2024 8:53:40 AM

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**From:** Ed Friedman <efriedman@msn.com>  
**Sent:** Friday, April 26, 2024 11:37 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] UC proposal

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Sent from my iPhone

To Whom It May Concern:

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I38-1

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project.
2. The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program,

I38-2

I38-3

makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

I38-3 cont.

3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.

I38-4

4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn't feasible.

I38-5

5. Finally, the City's conclusion that the High Density Alternative was the environmentally superior alternative isn't supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City's own conclusion states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Section 8.2.3, underline added.)

I38-6

The City should revise the DPEIR to address these issues.

I38-7

Ed Friedman

**I38: Responses to Ed Friedman Comment Letter**

**I38-1:** The comment is an introduction to the letter. No response is required.

**I38-2:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I38-3:** See response to comment I11-3 under comment letter I11.

**I38-4:** See response to comment I11-4 under comment letter I11.

**I38-5:** See response to comment I11-5 under comment letter I11.

**I38-6:** See response to comment I11-6 under comment letter I11.

**I38-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I39 - Sharon Gehl

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] comments on the Hillcrest Focused Plan Amendment draft EIR  
**Date:** Tuesday, April 30, 2024 9:30:10 AM  
**Attachments:** [Plan Hillcrest Comments, April 2024.docx](#)

---

**From:** slgehl2000@gmail.com <slgehl2000@gmail.com>  
**Sent:** Monday, April 29, 2024 10:20 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] comments on the Hillcrest Focused Plan Amendment draft EIR

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

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Attached are my comments on the Hillcrest Focused Plan Amendment draft EIR.  
Sharon Gehl

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I39-1

 Virus-free. [www.avg.com](http://www.avg.com)

## Comments on the Hillcrest Focused Plan Amendment March 2024 draft to the Uptown Community Plan

Sharon Gehl [slgehl2000@gmail.com](mailto:slgehl2000@gmail.com)

The proposed Plan Hillcrest LGBTQ+ Cultural District would be the most effective way of supporting the *City of San Diego's Strategic Plan* objective of "Celebrating the cultural diversity and history of the LGBTQ+ community".

I39-2

The Cultural District will use effective ways of communicating ideas such as words, written and spoken, pictures and color. It would also include a walking corridor that would link cultural interpretive elements and facilitate walking tours, another effective way to communicate ideas.

Identifying and preserving historic resources and districts on the other hand has proven to not only be ineffective in communicating cultural ideas in San Diego; it has done damage to the city by preventing much needed new multifamily housing, lowering property values, and hurting the city's tax base.

Society tends to pay for the things that we find work. Most of us learned the main points of history in school, from reading a book or newspaper, or from watching things like a Ken Burns documentary. While we pay teachers, writers, and producers, all City of San Diego, San Diego County, and California state historic buildings lose money; because most people are not interested in spending money on them. Why does the new Hillcrest Plan Amendment propose designating more buildings when people aren't interested in the ones we already have? What is going on?

The key to understanding Historic Preservation is this Wikipedia entry on the subject.

[https://en.wikipedia.org/wiki/Historic\\_preservation](https://en.wikipedia.org/wiki/Historic_preservation) Wikipedia defines Historic Preservation as a "philosophical concept". The concept/theory was that turning buildings into museums would be a good way to tell history. This theory has been tested in the US for over a hundred years. It was soon evident that it was wrong, that turning buildings into museums is not an effective or popular way to tell history. If you had a restaurant that didn't have enough customers, it would go out of business; but professional preservationists asked for donations big and small, for volunteers to work for free, and taxpayer money to bail their museums out.

I39-3

The fact that historically designated buildings are not financially viable became a continuing problem. It was still difficult for professional preservationists to make money. Then about 50 years ago preservationists found that they could make money by getting laws passed that allowed them to get control of other people's property - without having to compensate the owners financially.

As the chart below from the Wikipedia entry shows, now the majority of jobs in US historic preservation are not in Museums, 9%; but in Regulatory Compliance, 70%. In other words,

managing the laws and regulations that control officially designated or proposed historic properties. The more properties the City of San Diego Historic Resources Board (HRB) designates, either by force of law or because owners want big Mills Act tax subsidies, the more money professional preservationists in San Diego make. Adding more and more proposed properties to community plans is also a way for professional preservationists to make more money.

**Areas of professional, paid practice in historic preservation in the United States<sup>[6]</sup>**

Area of practice	! Percent (out of 100%)
Regulatory compliance (federal, state, and local)	69.7%
Architecture and construction	11.2%
Historic sites/museums	8.9%
Preservation advocacy	5.7%
Downtown revitalization	4.5%

I39-3  
cont.

Appendix E of the Uptown Community Plan lists over 525 Individually and District Designated properties, 17 Potential Historic Districts with some 2678 properties, 4 potential Multi-property Districts with some 953 properties, and 44 Potential Individually Listed properties. If the city already has over 500 designed properties that lower the city’s tax base and the majority of people ignore, why do we need another 3,500 to tell history?

The problem is that the City of San Diego’s historic preservation program is not actually about telling history, supporting the city’s climate action plan, or social equity; it’s about using laws to allow professional preservationists to get control of as much property as possible. The proof is the extremely boring DRAFT Hillcrest Focused Plan Amendment LGBTQ+ Historic Context Statement. LGBTQ+ history is actually quite interesting, but that Context Statement isn’t about telling history, it’s about establishing a legal basis for getting control of property that will hold up in court if the city is sued.

To summarize, the majority of Americans do not find historical preservation a good way to learn about history, it is therefore not financially viable; which makes it difficult for professional preservationists to make money. They solved their problem by getting laws passed. Now the overwhelming majority of them make money from taxpayer subsidies and government laws that give them control of other people’s properties without paying for them, not from using buildings to tell history.

I39-4



Buildings are particularly bad at telling cultural history, even if that was actually the city's intent. Buildings are just objects that say nothing. They need verbal, written, and/or visual explanations; which are more effective and less expensive than the building itself. The solution is to take all of the proposed historic properties and districts out of the Uptown and Hillcrest Focused Plan Amendment. The proposed Cultural District can talk about culture and history more effectively and for less money than designating buildings. A Cultural District can also evolve over time to keep up with changing needs and new LGBTQ+ history.

Do what is best for the majority of people in San Diego, not what is best for a handful of preservationists. Support the City's climate action goals, it's housing needs, and social equity.

**I39-4  
cont.**

**139: Responses to Sharon Gehl Comment Letter**

**139-1:** The comment introduces the attached comment letter.

**139-2:** The comment addresses the proposed LGBTQ+ Cultural District and does not address the adequacy of the Draft Program Environmental Impact Report (PEIR). No response is required.

**139-3:** The comment addresses concerns about how the implementation of the Hillcrest Historic District would deter the construction of multifamily housing, which the commenter is in support of. As detailed in the Draft PEIR Section 4.4.4, Issue 1, the Hillcrest Historic District's Supplemental Development Regulations (SDRs) are designed to protect the significant historic character-defining features – namely the storefronts and the 1-to-3-story pedestrian scale along the streetscape – while allowing for new development within the district. The proposed SDRs provide design regulations for contributing and non-contributing resources as identified in the Hillcrest Historic District nomination and by the Historical Resources Board when designated.

This comment addresses concerns with the proposed Hillcrest Historic District and does not address the adequacy of the Draft PEIR. No additional response is required.

**139-4:** The comment raises concerns about historical preservation and has been noted. The comment does not address the adequacy of the Draft PEIR. No response is required.

## Comment Letter I40 - Barbara Gellman

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Re: Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting  
**Date:** Tuesday, April 16, 2024 10:33:58 AM  
**Attachments:** [UC Rally Logo.png](#)

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**From:** Barbara Gellman <[bggellman@yahoo.com](mailto:bggellman@yahoo.com)>

**Sent:** Saturday, April 13, 2024 3:46 PM

**To:** Lukes, Suchitra <[SLukes@san Diego.gov](mailto:SLukes@san Diego.gov)>; Causman, Nathen <[NCausman@san Diego.gov](mailto:NCausman@san Diego.gov)>; Alo, Leo <[LALo@san Diego.gov](mailto:LALo@san Diego.gov)>; Tomlins, Coby <[CTomlins@san Diego.gov](mailto:CTomlins@san Diego.gov)>; Vonblum, Heidi <[VonblumH@san Diego.gov](mailto:VonblumH@san Diego.gov)>; Galloway, Tait <[TGalloway@san Diego.gov](mailto:TGalloway@san Diego.gov)>; CouncilMember Kent Lee <[KentLee@san Diego.gov](mailto:KentLee@san Diego.gov)>; Gloria, Todd <[MayorToddGloria@san Diego.gov](mailto:MayorToddGloria@san Diego.gov)>; Ackerman-Avila, Christopher <[CAckermanAvi@san Diego.gov](mailto:CAckermanAvi@san Diego.gov)>; PLN\_PlanningCEQA <[planningceqa@san Diego.gov](mailto:planningceqa@san Diego.gov)>; PLN University Community Plan Update <[planuniversity@san Diego.gov](mailto:planuniversity@san Diego.gov)>; Bonnie Kutch <[bkutch@kutchco.com](mailto:bkutch@kutchco.com)>

**Cc:** Chris Nielsen <[cn@adsc-xray.com](mailto:cn@adsc-xray.com)>; Andy Wiese <[awiese@sdsu.edu](mailto:awiese@sdsu.edu)>; Andrea Contreras <[andrea@sddirtlaw.com](mailto:andrea@sddirtlaw.com)>; Help Save UC <[helpsaveuc@gmail.com](mailto:helpsaveuc@gmail.com)>

**Subject:** [EXTERNAL] Re: Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting

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Excellent summary and follow up questions. What is the purpose of voting for a representative if they do not choose to hear us and fight for what is right? Do any of them live in our community, walk our neighborhoods, visit our schools and recreation centers, speak with our Police and Fire crews and most of all, listen to our community residents? Our ideas are not tainted by power or money like theirs seem to be.

I40-1

Barbara

On Saturday, April 13, 2024 at 03:02:40 PM PDT, Bonnie Kutch <[bkutch@kutchco.com](mailto:bkutch@kutchco.com)> wrote:

Dear City of San Diego Officials:

During the April 9th University City Planning Group meeting I attended in person, Suchi Lukes and

I40-2

Nathen Causman gave a 40-minute Zoom presentation of the city's revised University Community Plan Update and Draft EIR. Eight other city officials participated via Zoom. Suchi and Nathen gave a summary of the documents we had already reviewed when they were made available March 14th. These documents called for considerable clarification and substantiating, which we had expected city staff would be prepared to do.

I40-2  
cont.

Following city staff's presentation, members from the live audience and Zoom participants were given time to ask questions. However, Suchi, Nathen, Leo Alo, Coby Tomlin and consultants from Kyser Marston Associates were unable to answer the majority of our questions.

On behalf of the residents of University City who took the time and care to attend this meeting and pose our well-thought-out questions, I am requesting answers to each and every question below, in writing, by a date that is certain to give the community time to properly evaluate those answers, and ask our follow-up questions to those answers.

**THIS EMAIL IS TO TO PUT YOU ON NOTICE THAT WE WANT THE APRIL 30TH DEADLINE EXTENDED BECAUSE THE CITY WAS UNPREPARED TO ADDRESS THE PUBLIC'S QUESTIONS, MAKING THE MEETING A WASTE OF THE PUBLIC'S TIME AND MONEY AND SEVERELY CUTTING INTO THE SHORT 45-DAY REVIEW PERIOD WE WERE ALLOWED.**

I40-3

#### Questions That Still Need Answers:

1. Why was the Community Scenario in the city's revised UC Plan Update not included in the Draft EIR? Why would the Planning Department revive the "very high" Scenario 1 when it was discarded in July 2023? This makes no sense, and we need this question answered.

I40-4

2. Why were the Sprouts and Vons shopping centers in south UC up-zoned to CC-3-8? Sprouts is not an existing TPA and likely never will be with MTS's budget problems; why would you consider adding as many as 572 housing units there? And how can you justify adding another 373 at Vons for a total of 945 housing units along Governor Drive, our only ingress/egress into south UC, when that artery is already heavily congested? And why would you up-zone for 100 feet high at both centers when that height would be so far out of scale with the surrounding community, depriving surrounding residents of their privacy, sunlight, safety and relative quiet?

I40-5

I40-6

3. Page S-25, Impact on Schools: The DEIR states that "Implementation of the University CPU could result in the need for additional fire/rescue, police, school, and library facilities. The location and need for potential future facilities cannot be determined at this time ... " However, if you look at Appendix 12 of your documents, we see a memo from the San Diego Unified School District written six months ago that states that the UC Plan Update should have a location identified for new schools, and it specifically states it should be in the vicinity of Genesee and La Jolla Village Drive. How do you explain this glaring oversight, and what is your solution?

I40-7

4. Funding mechanism: There is only \$44 million in the budget currently for UC improvements. The Plan Update has been presented to UC residents by the city with plenty of colorful and attractive renderings of tree-lined streets and pathways, parks and other community enhancements. Will you properly explain what the funding mechanism will be for all the needed infrastructure, recreational facilities, improvements and services in UC when DIFs are being waived or redirected to other communities?

I40-8

5. In Leo Alo's explanation of the city's "Traffic Analysis", he stated that VMT was the new standard of measuring traffic. However, the VMT data collected by the city was obtained from SANDAG's Series 14 Activity Based Model, ***which is now eight years old***. We have an expert witness who can testify that, under base year conditions, the ***University CPU exceeds the thresholds by being above 85 percent*** of the regional means for both VMT per Capita and VMT per Employee, as well as 90 percent and 126 percent of the Base Year regional means, respectively. By 2050, with the implementation of the UCPU, the VMT is projected to be 60 percent and 85.3 percent, respectively, of the Base year Regional means. **No part of the UCPU may go forward without a current, thorough Traffic Study performed at peak traffic times. This is particularly true for Governor Drive.**

I40-9

6. Nearly 100 percent of the housing demand citywide is for for-sales homes to house entire families, while rental apartments have been far overbuilt. Yet, it appears that the UCPU is being up-zoned entirely for more high-rise apartments rather than single-family or multi-family for-sale homes. Nathen's explanation that many of the apartments could be for-sale condos, but he offered no solution for families with children and pets who need multiple bedrooms and readily accessible yards or other outdoor recreational space. If the city's goal is to provide more housing for the people who work in UC and won't have to commute long distances, then are you assuming that UC's workforce is entirely young, single and childless?

I40-10

7. There was no proper answer given to the question of how Complete Communities Housing Solutions plays into the overall UCPU and how it's expected to add to the overall housing density, impact traffic, further burden existing infrastructure, and skew the number of DU/AC on the Plan Update's density map. If CCHS is not under the purview of the Planning Department, as Nathen stated, then how is this being tracked and calculated? Who's keeping score?

I40-11

8. There was not adequate explanation as to how the Plan Update will ensure there is enough retail to serve the residents of UC. If UC residents are forced to drive to Clairemont or Del Mar to do their shopping, does that not defeat the city's goal of cutting down VMT?

I40-12

9. There was no response to the point made about SANDAG's Series 15 population projection of there being a mere 65,000 additional people in all of San Diego between 2022 and 2050, which means the UCPU aims to add 40 times the housing units needed in UC alone!! How can the city justify this?

I40-13

#### **Additional Questions That Need Answers**

10. Explain where the 1.8 recreation centers missing from the UCPU will go, and what mitigation efforts have been done. Explain how the one new recreation center the city has proposed at the Shiley Eye Center at Scripps Torrey Pines could possibly serve nearby residents when there are no residences in that area.

I40-14

11. Explain how the two additional parks that the city says will be added can possibly function as neighborhood/community parks when they are nothing more than small strips of land away from residences and could not possibly accommodate a game of soccer, baseball, or other activities. The Draft EIR states that the city cannot ensure it will build any more recreational facilities, so where do you imagine people will have any outdoor recreational areas at all when it adds 65,000+ more people?

I40-15

12. The Draft UC Community Plan had "Community Goals". The city's revised Plan Update eliminates all those goals and only lists "City of San Diego Goals." Why?

I40-16

13. The Draft EIR discusses current fire station placement but does not say where new fire stations will be build to serve the added population in UC. Explain how this is being addressed.

I40-17

14. UC is already short of police coverage and we are already far behind city targets. Why have additional police force or stations not been offered? And what has the official response been from the Police Department?

I40-18

15. In the Community Engagement document, no mention is made of the petition submitted by UC PEEPS in March 2023 with close to 2,200 signatures objecting to the city's proposed plans; in fact, we received no response from city officials about that petition whatsoever. No mention is made of the three large-scale protests against the city's high-density housing plans held in UC and across the city. No mention is made of the thousands of letters submitted by community residents to city officials opposing their Plan Update. No mention was made of the extensive media coverage generated against the city's proposed Plan Update. Why was this not included in the Community Engagement document?

I40-19

I, along with many other members of the UC community, await your responses.

Sincerely,

Bonnie Kutch  
Resident & Property-Tax Paying Homeowner, University City



Bonnie Kutch | University City Peeps | [www.ucpeeps.org](http://www.ucpeeps.org) | 619.299.1010

**I40: Response to Barbara Gellman Comment Letter**

**I40-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I40-2:** The comment is an introduction to the comment letter and the commenter's general concerns.

**I40-3:** See response to comment I58-2 under comment letter I58.

**I40-4:** See response to comment O13-5 under comment letter O13.

**I40-5:** See response to comment I58-4 under comment letter I58.

**I40-6:** See response to comment I58-5 under comment letter I58.

**I40-7:** See response to comment O13-4 under comment letter O13.

**I40-8:** See response to comment I58-7 under comment letter I58.

**I40-9:** See response to comment O13-2 under comment letter O13.

**I40-10:** See response to comment I58-9 under comment letter I58.

**I40-11:** See response to comment I58-10 under comment letter I58.

**I40-12:** See response to comment I58-11 under comment letter I58.

**I40-13:** See response to comment I58-12 under comment letter I58.

**I40-14:** See response to comment I58-13 under comment letter I58.

**I40-15:** See response to comment I58-14 under comment letter I58.

**I40-16:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I40-17:** See response to comment I13-5 under comment letter I13.

**I40-18:** See response to comment I13-17 under comment letter I13.

**I40-19:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I41 - Sue Gilmore

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Governor Road  
**Date:** Tuesday, April 30, 2024 9:05:12 AM

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**From:** Sue Gilmore <sueheather@sbcglobal.net>  
**Sent:** Sunday, April 28, 2024 12:11 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Governor Road

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To Whom It May Concern: Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant. III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not. IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative. V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching

I41-1

I41-2

I41-3

I41-4

I41-5

I41-6



amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update. VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts : The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I41-6 cont.

I41-7

I41-8

S. Gilmor

Sent from my iPhone

**I41: Responses to Sue Gilmore Comment Letter**

**I41-1:** See response to comment O13-1 under comment letter O13.

**I41-2:** See response to comment O13-2 under comment letter O13.

**I41-3:** See response to comment O13-3 under comment letter O13.

**I41-4:** See response to comment O13-4 under comment letter O13.

**I41-5:** See response to comment O13-5 under comment letter O13.

**I41-6:** See response to comment O13-6 under comment letter O13.

**I41-7:** See response to comment O13-7 under comment letter O13.

**I41-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I42 - Frederick Gorris

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 8:56:07 AM

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**From:** Frederick Gorris <f122147@aol.com>  
**Sent:** Friday, April 26, 2024 1:22 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** CouncilMember Kent Lee <KentLee@sandiego.gov>; universitycitypeeps@gmail.com;  
CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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To Those It May Concerns:

The following were considered when supporting the issues below:

1. The areas combined are TWO different climates and need separate Impact Studies reflecting the unique climates I42-1
2. With the population more than doubling, stating “No new schools...” is contradictory without considering environmental impact of traffic in charter school neighborhoods to accommodate the population increase proposal. I42-2
3. DEIR should consider the near doubling of fire and police vehicles to accommodate proposed housing increase. I42-3
4. Scripts Ranch lessons learned should be used to address the community safety for emergency egress IVO of the significant doubling of population less than a 10 mile radius. I42-4

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. I42-5

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to I42-6

I42-7

ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence since the population is projected to more than double. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I42-7  
cont.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

I42-8

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

I42-9

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I42-10

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I42-11

I42-12

Sincerely,

Frederick D. Gorris  
UC resident

**I42: Response to Frederick Gorris Comment Letter**

**I42-1:** See response to comment O13-6 under comment letter O13.

**I42-2:** See response to comment O13-4 under comment letter O13.

**I42-3:** See response to comments I13-3 and I13-5 under comment letter I13.

**I42-4:** See response to comment O13-3 under comment letter O13.

**I42-5:** See response to comment O13-1 under comment letter O13.

**I42-6:** See response to comment O13-2 under comment letter O13.

**I42-7:** See response to comment O13-3 under comment letter O13.

**I42-8:** See response to comment O13-4 under comment letter O13.

**I42-9:** See response to comment O13-5 under comment letter O13.

**I42-10:** See response to comment O13-6 under comment letter O13.

**I42-11:** See response to comment O13-7 under comment letter O13.

**I42-12:** Comment noted. The Complete Communities program is not a part of the scope of the project analyzed in the Draft Program Environmental Impact Report (PEIR) and the environmental impacts of the Complete Communities program were addressed in Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I43 - Kristin Graham

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: Objections to the City's recent Environmental Impact Report  
**Date:** Tuesday, April 30, 2024 8:54:10 AM

---

**From:** K Graham <turi@ix.netcom.com>  
**Sent:** Friday, April 26, 2024 12:28 PM  
**To:** CouncilMember Kent Lee <KentLee@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; tomlins@sandiego.gov  
**Cc:** K Graham <turi@ix.netcom.com>  
**Subject:** [EXTERNAL] Objections to the City's recent Environmental Impact Report

**\*\*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 Kent Lee, Mayor Todd Gloria, Nathen Causman, Suchitra Lukes & Coby Tomlins,**

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I43-1

### **Governor Drive Lane Reductions**

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I43-2

I43-3

I43-4

### **Emergency Ingress/Egress**

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I43-5

### **New High-Rise Apartments Planned for Genesee and Nobel Drive**

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315

I43-6

“luxury” apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

I43-6  
cont.

### **Vons & Sprouts Centers New Height and Sharply Higher Density Allowances**

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von’s shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

I43-7

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout’s shopping plaza. The Sprout’s shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

### **Planning Deficiencies in Parks**

Under the City’s ‘Master Plan’, the UC area is already short on publicly accessible parks – not “greenways” or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

I43-8

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents’ input, and intentionally erodes single-family neighborhoods.

I43-9

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

I43-10

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

I43-11

Kristin Graham  
Cambridge Terrace



**I40: Response to Barbara Gellman Comment Letter**

**I40-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I40-2:** The comment is an introduction to the comment letter and the commenter's general concerns.

**I40-3:** See response to comment I58-2 under comment letter I58.

**I40-4:** See response to comment O13-5 under comment letter O13.

**I40-5:** See response to comment I58-4 under comment letter I58.

**I40-6:** See response to comment I58-5 under comment letter I58.

**I40-7:** See response to comment O13-4 under comment letter O13.

**I40-8:** See response to comment I58-7 under comment letter I58.

**I40-9:** See response to comment O13-2 under comment letter O13.

**I40-10:** See response to comment I58-9 under comment letter I58.

**I40-11:** See response to comment I58-10 under comment letter I58.

**I40-12:** See response to comment I58-11 under comment letter I58.

**I40-13:** See response to comment I58-12 under comment letter I58.

**I40-14:** See response to comment I58-13 under comment letter I58.

**I40-15:** See response to comment I58-14 under comment letter I58.

**I40-16:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I40-17:** See response to comment I13-5 under comment letter I13.

**I40-18:** See response to comment I13-17 under comment letter I13.

**I40-19:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I44 - Harry Griswold

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:21:19 AM

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**From:** Harry Griswold <griswold@san.rr.com>  
**Sent:** Monday, April 29, 2024 1:07 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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To Those in Decision-Making Positions:

These are my comments about the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I44-1

I44-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I44-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

I44-4

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

I44-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I44-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I44-7

I44-8

Most Sincerely,

Harry Griswold, concerned resident

5556 Stresemann St  
San Diego, CA 92122

**I44: Responses to Harry Griswold Comment Letter**

**I44-1:** See response to comment O13-1 under comment letter O13.

**I44-2:** See response to comment O13-2 under comment letter O13.

**I44-3:** See response to comment O13-3 under comment letter O13.

**I44-4:** See response to comment O13-4 under comment letter O13.

**I44-5:** See response to comment O13-5 under comment letter O13.

**I44-6:** See response to comment O13-6 under comment letter O13.

**I44-7:** See response to comment O13-7 under comment letter O13.

**I44-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I45 - Michelle Gross

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] peir comment uc: airport cautions  
**Date:** Tuesday, April 30, 2024 9:29:59 AM

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**From:** MichelleK Gross <michellekgross@gmail.com>  
**Sent:** Monday, April 29, 2024 10:01 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] peir comment uc: airport cautions

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Be aware that the Miramar airbase includes Governor Drive as part of its extended runway for emergency use.

This airport is not under FAA jurisdiction, so is exempt from its regulations on low altitude flights, which include the Blue Angels.

[https://en.wikipedia.org/wiki/Marine\\_Corps\\_Air\\_Station\\_Miramar#:~:text=On%208%20December%202008%2C%20four,the%20coast%20of%20San%20Diego](https://en.wikipedia.org/wiki/Marine_Corps_Air_Station_Miramar#:~:text=On%208%20December%202008%2C%20four,the%20coast%20of%20San%20Diego).

<https://www.sandiegouniontribune.com/military/sd-me-blueangels-crash-20160915-story.html>

<https://www.sandiegouniontribune.com/military/sd-me-blueangels-crash-20160915-story.html> See map with flight corridor

I45-1

**I45: Response to Michelle Gross Comment Letter**

**I45-1:** The Marine Corps Air Station Miramar Airport Land Use Compatibility Plan (ALUCP), the land use planning document used to promote compatibility between airports and the land uses that surround them, does not identify Governor Drive to be an extended runway. This comment about airport safety has been noted. See Section 4.10.4 Issue 2(j) of the Draft Program Environmental Impact Report for a discussion of the project's compatibility with ALUCPs.

**Comment Letter I46 - S. Halevy**

(page 1 -3)



## Comment Letter I46 - S. Halevy

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Thoughts on Review of the University City Community Plan Update and EIR - — Nextdoor  
**Date:** Tuesday, April 16, 2024 10:36:22 AM

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**From:** S Halevy <shalevy1@gmail.com>  
**Sent:** Monday, April 8, 2024 8:14 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Thoughts on Review of the University City Community Plan Update and EIR - — Nextdoor

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Check out this post on Nextdoor: [https://nextdoor.com/p/YM3Mxrm65kbd?utm\\_source=share&extras=NTA0ODMzNg%3D%3D&utm\\_campaign=1712589119864](https://nextdoor.com/p/YM3Mxrm65kbd?utm_source=share&extras=NTA0ODMzNg%3D%3D&utm_campaign=1712589119864)

What a shame! You are pushing your plan down the throat of the residents

I46-1

**I46: Response to S. Halevy Comment Letter**

**I46-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I47 - Daina Hartin

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative - Resident Feedback  
**Date:** Friday, April 26, 2024 10:51:58 AM

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**From:** Daina Hartin <dainahartin@yahoo.com>  
**Sent:** Friday, April 26, 2024 9:31 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative - Resident Feedback

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To Whom It May Concern:

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I47-1

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an

I47-2

informational document to inform the general public of the significant environmental effect of a project.

I47-2  
cont.

2. The City’s failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

I47-3

3. The City’s failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.

I47-4

4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the “community-preferred alternative” (Scenario B) in the City’s last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn’t feasible.

I47-5

5. Finally, the City’s conclusion that the High Density Alternative was the environmentally superior alternative isn’t supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City’s own conclusion states, “No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project.” (Section 8.2.3, underline added.)

I47-6

The City should revise the DPEIR to address these issues.

147-7

Thank you for your consideration.

Daina Hartin

**I47: Responses to Daina Hartin Comment Letter**

**I47-1:** The comment is an introduction to the letter. No response is required.

**I47-2:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I47-3:** See response to comment I11-3 under comment letter I11.

**I47-4:** See response to comment I11-4 under comment letter I11.

**I47-5:** See response to comment I11-5 under comment letter I11.

**I47-6:** See response to comment I11-6 under comment letter I11.

**I47-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I48 - James Hering

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Hillcrest bike project  
**Date:** Thursday, April 25, 2024 8:09:56 AM

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-----Original Message-----

From: Jim Hering <jimhering@gmail.com>  
Sent: Tuesday, April 23, 2024 11:24 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Subject: [EXTERNAL] Hillcrest bike project

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I live in Bankers Hill and regularly ride from there to IB and Mission Bay. A safe bike route is absolutely necessary in order to ride that route. Ending the safe route at Dive St. leaves a gap in the safe route that is not acceptable. The safe bike route needs to extend further West in order to provide access to the Beaches from downtown, Hillcrest, and Bankers Hill.

James Hering  
2604 5th Ave.  
San Diego  
Sent from my iPhone  
Mobil: +1-559-289-7838

I48-1

**I48: Response to James Hering Comment Letter**

**I48-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.



## Comment Letter I49 - Edmund Hintz

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Thursday, April 25, 2024 8:11:14 AM

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-----Original Message-----

From: Edmund Hintz <ed@hintz.org>  
Sent: Wednesday, April 24, 2024 3:50 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Cc: Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
Subject: [EXTERNAL] Comments to University Community Plan Update Draft EIR

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

To Whom It May Concern:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I49-1

I49-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I49-3

III. School Requirements from the San Diego School District Must Be Met.

The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I49-4

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I49-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I49-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts:

The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate.

The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I49-7

I49-8

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Regards,

Ed Hintz  
ed@hintz.org  
6949 Fisk Ave  
San Diego, CA, 92122

**I49: Responses to Edmund Hintz Comment Letter**

**I49-1:** See response to comment O13-1 under comment letter O13.

**I49-2:** See response to comment O13-2 under comment letter O13.

**I49-3:** See response to comment O13-3 under comment letter O13.

**I49-4:** See response to comment O13-4 under comment letter O13.

**I49-5:** See response to comment O13-5 under comment letter O13.

**I49-6:** See response to comment O13-6 under comment letter O13.

**I49-7:** See response to comment O13-7 under comment letter O13.

**I49-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I50 - Kenway and Jeanne Hoey Comment Letter

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 8:58:18 AM

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**From:** Jeanne Hoey <jhoey1@san.rr.com>  
**Sent:** Friday, April 26, 2024 8:11 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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### To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I50-1

I50-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I50-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR

I50-4

states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

I50-4 cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

I50-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I50-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I50-7

I50-8

Sincerely,  
Kenway & Jeanne Hoey/6141 Agee St.

**I50: Responses to Kenway and Jeanne Hoey Comment Letter**

**I50-1:** See response to comment O13-1 under comment letter O13.

**I50-2:** See response to comment O13-2 under comment letter O13.

**I50-3:** See response to comment O13-3 under comment letter O13.

**I50-4:** See response to comment O13-4 under comment letter O13.

**I50-5:** See response to comment O13-5 under comment letter O13.

**I50-6:** See response to comment O13-6 under comment letter O13.

**I50-7:** See response to comment O13-7 under comment letter O13.

**I50-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I51 - Angie Jones

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: Comments on DPEIR for UC Community Plan Update  
**Date:** Tuesday, April 30, 2024 9:06:05 AM

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**From:** Angie Grosland Jones <angiegrosland@hotmail.com>  
**Sent:** Sunday, April 28, 2024 9:46 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Comments on DPEIR for UC Community Plan Update

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To Whom It May Concern:

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I51-1

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project.

I51-2

The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

I51-3

The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.

I51-4

The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn't feasible.

I51-5

Finally, the City’s conclusion that the High Density Alternative was the environmentally superior alternative isn’t supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City’s own conclusion states, “No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project.” (Section 8.2.3, underline added.)

I51-6

The City should revise the DPEIR to address these issues.

I51-7

Angie G. Jones

University City resident  
92122



**I51: Responses to Angie Grosland Jones Comment Letter**

**I51-1:** The comment is an introduction to the letter. No response is required.

**I51-2:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I51-3:** See response to comment I11-3 under comment letter I11.

**I51-4:** See response to comment I11-4 under comment letter I11.

**I51-5:** See response to comment I11-5 under comment letter I11.

**I51-6:** See response to comment I11-6 under comment letter I11.

**I51-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I52 - Neeta & Prashant Katak

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:11:08 AM

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**From:** Neeta Prashant <pnkfamily@yahoo.com>  
**Sent:** Sunday, April 28, 2024 2:25 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoelaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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To the UC planning committee and San Diego city officials:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I52-1

I52-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I52-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the

I52-4

University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I52-4  
cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I52-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I52-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental and Safety Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I52-7

I52-8

Sincerely,

Neeta & Prashant Kantak  
3262 Millikin Avenue, San Diego, CA 92122  
Tel: 858-638-7595

**I52: Responses to Neeta and Prashant Kantak Comment Letter**

**I52-1:** See response to comment O13-1 under comment letter O13.

**I52-2:** See response to comment O13-2 under comment letter O13.

**I52-3:** See response to comment O13-3 under comment letter O13.

**I52-4:** See response to comment O13-4 under comment letter O13.

**I52-5:** See response to comment O13-5 under comment letter O13.

**I52-6:** See response to comment O13-6 under comment letter O13.

**I52-7:** See response to comment O13-7 under comment letter O13.

**I52-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I53 - Linda Kaplan

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update -- Draft EIR  
**Date:** Tuesday, April 30, 2024 8:58:39 AM

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**From:** Linda Kaplan <lakaplan4@gmail.com>  
**Sent:** Saturday, April 27, 2024 9:14 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** University City Peeps <universitycitypeeps@gmail.com>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update -- Draft EIR

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To Whom It May Concern:

Below are my comments and objections to several parts of the City of San Diego's University Community Plan Update Draft EIR (DEIR) as several of them are legally deficient:

I. Changes to Governor Drive: Converting Governor Drive from a four-lane Major Arterial to two-lanes may actually fail the legal test because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. **No changes to Governor Drive can be made without a current Traffic Analysis and VMT performed at peak hour traffic times.**

I53-1

II. Emergency Access/Ingress:

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as it's proximity to MCAS Miramar, just to name two factors. **The City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.** Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I53-2

III. School Requirements from the San Diego School District Must Be Met: The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. **Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.**

I53-3

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. **The DEIR needs to be revised to include the community's preferred alternative.**

I53-4

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. **The DEIR should be separated into three separate EIRs for each proposed plan update.**

I53-5

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. **Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.**

I53-6

I53-7

**I hope that this time around the City does seriously welcome thoughtful input and inclusion from residents!**

I53-8

Linda Kaplan  
4337 Nobel Drive  
San Diego CA 92122

**I53: Responses to Linda Kaplan Comment Letter**

**I53-1:** The comment is an introduction to the letter. See response to comments O13-1 and O13-2 under comment letter O13.

**I53-2:** See response to comments O13-2 and O13-3 under comment letter O13.

**I53-3:** See response to comment O13-4 under comment letter O13.

**I53-4:** See response to comment O13-5 under comment letter O13.

**I53-5:** See response to comment O13-6 under comment letter O13.

**I53-6:** See response to comment O13-7 under comment letter O13.

**I53-7:** See response to comment O13-8 under comment letter O13.

**I53-8:** Comment noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I54 - Brian Keliher

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University City Plan  
**Date:** Wednesday, April 3, 2024 8:27:18 AM

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**From:** Brian Keliher <brianklegal@gmail.com>  
**Sent:** Tuesday, April 2, 2024 9:36 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] University City Plan

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Greetings,

As long-time residents of North University City we have serious concerns about the proposed Urban Village high 3 rating for the corner of Genesee and Nobel.

We understand more housing is needed. We also know high rises are popping up all along Genesee, from Nobel to La Jolla Village Drive. Parking in our neighborhood, near Decoro, is already tight, and traffic, during rush hour, is extremely congested.

We encourage a slight density downgrade, to an Urban Village high 1 or 2 rating. This would represent reasonable and responsible growth.

Thank you,  
Brian

PS Please note that UCSD, too, will be adding a considerable number of on campus housing units through 2035.  
<https://urbanland.uli.org/uscsds-student-housing-project-to-offer-below-market-rate-rental-options#:~:text=By%202025%2C%20the%20university%20will,rates%20by%20the%20year%202035>.

--  
Brian Keliher  
Attorney at Law  
8285 Avenida Navidad, Unit 1  
San Diego, CA 92122  
619-607-7006

CONFIDENTIALITY NOTICE: this Email is protected by the Electronic Communications Privacy Act, 18 U.S.C. Sections 2510-2511 and is legally privileged and is intended solely for the individual

I54-1

I54-2



and/or entity to whom it is addressed and is protected by the attorney-client or work product privileges or contains inside information, and unauthorized use is prohibited. If you have received this message in error, please notify the sender by replying to this email and then delete it from your computer. Do not copy or disclose it to anyone else. If you properly received this e-mail as a client, co-counsel or retained expert of ours, you should maintain its contents in confidence in order to preserve the attorney-client privilege or work product privilege that may be available to protect confidentiality.

**I54: Response to Brian Keliher Comment Letter**

**I54-1:** The comment about the density of the housing has been noted. The proposed mix of higher-density housing and retail for the University Community Plan Update is meant to support the City of San Diego's General Plan and Climate Action Plan goals while also meeting the State's Regional Housing Need Allocation for the City of San Diego. Focusing on building higher-density housing in urban areas, especially near transit hubs, would give community members the opportunity to take alternative modes of transportation.

In regard to traffic, it should be noted that CEQA no longer uses congestion and parking levels as thresholds for significant impacts. Since the passage of Senate Bill 743 in 2018, CEQA Guidelines Section 15064.3 no longer uses traffic counts, auto delays, levels of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts.

**I54-2:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I55 - Joseph Keller

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Governor Dr  
**Date:** Tuesday, April 30, 2024 9:05:24 AM

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-----Original Message-----

From: Joseph Keller <kellerconst@sbcglobal.net>  
Sent: Sunday, April 28, 2024 7:23 AM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Subject: [EXTERNAL] Governor Dr

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Just when I thought you idiots were done with the bike lane lunacy, you want to destroy Governor Dr for us. You prove again how you are destroying San Diego.

I55-1

**I55: Response to Joseph Keller Comment Letter**

**I55-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I56 - Earl Kline

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 8:55:34 AM

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**From:** Galloway, Tait <TGalloway@sandiego.gov>  
**Sent:** Friday, April 26, 2024 12:58 PM  
**To:** PLN University Community Plan Update <planuniversity@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** FW: Comments to University Community Plan Update Draft EIR

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To Whom It May Concern:

Below are my comments on the City of San Diego's University Community Plan Update Draft EIR (DEIR):

In a short distance on Governor Drive, there is The Marketplace , Spreckels Elementary, Fort Field Little League baseball field, Standley Recreation Center, Swanson Memorial Pool, Standley Aquatic Center, Jim Carl Field, Standley Middle School, All Saints Lutheran Church, Chabad Center of University City, University Square, Chase Bank, University Community Library, Curie Elementary. University City High School is just off Governor.

I56-1

All these facilities attract groups and families who drive in their cars. All lanes of Governor are frequently full.

People come from all over San Diego for some of the sports events.

It is not reasonable to expect large groups of people to ride bicycles.

There aren't enough buses to replace the cars.

There are many older people in the community who depend on cars to go shopping. They couldn't ride bicycles if they wanted to.

Please keep Governor Drive as it is.

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I56-2

I56-3

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an

I56-4

analysis, the DEIR cannot conclude the impact will be less than significant.

I56-4 cont.

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

I56-5

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

I56-6

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I56-7

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I56-8

I56-9

Sincerely,

Earl Kline  
5873 Scripps ST  
San Diego  
CA  
92122

**I56: Responses to Earl Kline Comment Letter**

**I56-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

**I56-2:** See response to comment O13-1 under comment letter O13.

**I56-3:** See response to comment O13-2 under comment letter O13.

**I56-4:** See response to comment O13-3 under comment letter O13.

**I56-5:** See response to comment O13-4 under comment letter O13.

**I56-6:** See response to comment O13-5 under comment letter O13.

**I56-7:** See response to comment O13-6 under comment letter O13.

**I56-8:** See response to comment O13-7 under comment letter O13.

**I56-9:** See response to comment O13-8 under comment letter O13.

## Comment Letter I57 - Michael Kozma

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Michael Kozma - DPEIR Comments for University Community Plan  
**Date:** Tuesday, April 30, 2024 9:12:32 AM

---

**From:** Michael Kozma <mmichaelkozma@gmail.com>  
**Sent:** Sunday, April 28, 2024 9:01 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Michael Kozma - DPEIR Comments for University Community Plan

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

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My name is Michael Kozma, I am a resident of University City, and I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I57-1

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project.
2. The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate,

I57-2

I57-3



specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

**I57-3  
cont.**

3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.
4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated an alternative that they admitted wasn't feasible.
5. Finally, the City's conclusion that the High Density Alternative was the environmentally superior alternative isn't supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City's own conclusion states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Section 8.2.3, underline added.)

**I57-4**

**I57-5**

**I57-6**

The City should conduct a DPEIR for the University Community Plan specifically, that analyzes environmental impacts assuming the full build-out of the proposed UCP, that uses a new traffic study of the region, and that is more accessible to the public for review.

**I57-7**

Thank you for your consideration, and I would like to reiterate my support for the more formal and extensive comments submitted by Help Save UC on April 25th,

**I57-8**

2024.

| 157-8 cont.

Michael Kozma.

**I57: Response to Michael Kozma Comment Letter**

**I57-1:** The comment is an introduction to the letter. No response is required.

**I57-2:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I57-3:** See response to comment I11-3 under comment letter I11.

**I57-4:** See response to comment I11-4 under comment letter I11.

**I57-5:** See response to comment I11-5 under comment letter I11.

**I57-6:** See response to comment I11-6 under comment letter I11.

**I57-7:** See response to comments O13-2 and O13-6 under comment letter O13. Also see response to comment I11-3 under comment letter I11.

**I57-8:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I58 - Bonnie Kutch

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting  
**Date:** Tuesday, April 16, 2024 10:33:47 AM  
**Attachments:** [UC Rally Logo.png](#)

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**From:** Bonnie Kutch <bkutch@kutchco.com>  
**Sent:** Saturday, April 13, 2024 3:02 PM  
**To:** Lukes, Suchitra <SLukes@san Diego.gov>; Causman, Nathen <NCausman@san Diego.gov>; Alo, Leo <LAlo@san Diego.gov>; Tomlins, Coby <CTomlins@san Diego.gov>; Vonblum, Heidi <VonblumH@san Diego.gov>; Galloway, Tait <TGalloway@san Diego.gov>; CouncilMember Kent Lee <KentLee@san Diego.gov>; Gloria, Todd <MayorToddGloria@san Diego.gov>; Ackerman-Avila, Christopher <CAckermanAvi@san Diego.gov>; PLN\_PlanningCEQA <planningceqa@san Diego.gov>; PLN University Community Plan Update <planuniversity@san Diego.gov>  
**Cc:** Chris Nielsen <cn@adsc-xray.com>; Andy Wiese <awiese@sdsu.edu>; Andrea Contreras <andrea@sddirtlaw.com>; Help Save UC <helpsaveuc@gmail.com>  
**Subject:** [EXTERNAL] Requesting Answers to Questions Staff Were Unable to Answer at 4/9/24 UCPG Meeting

**\*\*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 City of San Diego Officials:

During the April 9th University City Planning Group meeting I attended in person, Suchi Lukes and Nathen Causman gave a 40-minute Zoom presentation of the city's revised University Community Plan Update and Draft EIR. Eight other city officials participated via Zoom. Suchi and Nathen gave a summary of the documents we had already reviewed when they were made available March 14th. These documents called for considerable clarification and substantiating, which we had expected city staff would be prepared to do.

Following city staff's presentation, members from the live audience and Zoom participants were given time to ask questions. However, Suchi, Nathen, Leo Alo, Coby Tomlin and consultants from Kyser Marston Associates were unable to answer the majority of our questions. On behalf of the residents of University City who took the time and care to attend this meeting and pose our well-thought-out questions, I am requesting answers to each and every question below, in writing, by a date that is certain to give the community time to properly evaluate those answers, and ask our follow-up questions to those answers.

**THIS EMAIL IS TO TO PUT YOU ON NOTICE THAT WE WANT THE APRPIL 30TH DEADLINE EXTENDED BECAUSE THE CITY WAS UNPREPARED TO ADDRESS THE PUBLIC'S QUESTIONS, MAKING THE MEETING A WASTE OF THE PUBLIC'S TIME AND MONEY AND SEVERELY CUTTING INTO THE SHORT 45-DAY REVIEW PERIOD WE WERE ALLOWED.**

I58-1

I58-2

## Questions That Still Need Answers:

1. Why was the Community Scenario in the city's revised UC Plan Update not included in the Draft EIR? Why would the Planning Department revive the "very high" Scenario 1 when it was discarded in July 2023? This makes no sense, and we need this question answered.

I58-3

2. Why were the Sprouts and Vons shopping centers in south UC up-zoned to CC-3-8? Sprouts is not an existing TPA and likely never will be with MTS's budget problems; why would you consider adding as many as 572 housing units there? And how can you justify adding another 373 at Vons for a total of 945 housing units along Governor Drive, our only ingress/egress into south UC, when that artery is already heavily congested? And why would you up-zone for 100 feet high at both centers when that height would be so far out of scale with the surrounding community, depriving surrounding residents of their privacy, sunlight, safety and relative quiet?

I58-4

I58-5

3. Page S-25, Impact on Schools: The DEIR states that "Implementation of the University CPU could result in the need for additional fire/rescue, police, school, and library facilities. The location and need for potential future facilities cannot be determined at this time ... " However, if you look at Appendix 12 of your documents, we see a memo from the San Diego Unified School District written six months ago that states that the UC Plan Update should have a location identified for new schools, and it specifically states it should be in the vicinity of Genesee and La Jolla Village Drive. How do you explain this glaring oversight, and what is your solution?

I58-6

4. Funding mechanism: There is only \$44 million in the budget currently for UC improvements. The Plan Update has been presented to UC residents by the city with plenty of colorful and attractive renderings of tree-lined streets and pathways, parks and other community enhancements. Will you properly explain what the funding mechanism will be for all the needed infrastructure, recreational facilities, improvements and services in UC when DIFs are being waived or redirected to other communities?

I58-7

5. In Leo Alo's explanation of the city's "Traffic Analysis", he stated that VMT was the new standard of measuring traffic. However, the VMT data collected by the city was obtained from SANDAG's Series 14 Activity Based Model, **which is now eight years old**. We have an expert witness who can testify that, under base year conditions, the **University CPU exceeds the thresholds by being above 85 percent** of the regional means for both VMT per Capita and VMT per Employee, as well as 90 percent and 126 percent of the Base Year regional means, respectively. By 2050, with the implementation of the UCPU, the VMT is projected to be 60 percent and 85.3 percent, respectively, of the Base year Regional means. **No part of the UCPU may go forward without a current, thorough Traffic Study performed at peak traffic times. This is particularly true for Governor Drive.**

I58-8

6. Nearly 100 percent of the housing demand citywide is for for-sales homes to house entire families, while rental apartments have been far overbuilt. Yet, it appears that the UCPU is being up-zoned entirely for more high-rise apartments rather than single-family or multi-family for-sale

I58-9

homes. Nathen’s explanation that many of the apartments could be for-sale condos, but he offered no solution for families with children and pets who need multiple bedrooms and readily accessible yards or other outdoor recreational space. If the city’s goal is to provide more housing for the people who work in UC and won’t have to commute long distances, then are you assuming that UC’s workforce is entirely young, single and childless?

I58-9

7. There was no proper answer given to the question of how Complete Communities Housing Solutions plays into the overall UCPU and how it’s expected to add to the overall housing density, impact traffic, further burden existing infrastructure, and skew the number of DU/AC on the Plan Update’s density map. If CCHS is not under the purview of the Planning Department, as Nathen stated, then how is this being tracked and calculated? Who’s keeping score?

I58-10

8. There was not adequate explanation as to how the Plan Update will ensure there is enough retail to serve the residents of UC. If UC residents are forced to drive to Clairemont or Del Mar to do their shopping, does that not defeat the city’s goal of cutting down VMT?

I58-11

9. There was no response to the point made about SANDAG’s Series 15 population projection of there being a mere 65,000 additional people in all of San Diego between 2022 and 2050, which means the UCPU aims to add 40 times the housing units needed in UC alone!! How can the city justify this?

I58-12

#### **Additional Questions That Need Answers**

10. Explain where the 1.8 recreation centers missing from the UCPU will go, and what mitigation efforts have been done. Explain how the one new recreation center the city has proposed at the Shiley Eye Center at Scripps Torrey Pines could possibly serve nearby residents when there are no residences in that area.

I58-13

11. Explain how the two additional parks that the city says will be added can possibly function as neighborhood/community parks when they are nothing more than small strips of land away from residences and could not possibly accommodate a game of soccer, baseball, or other activities. The Draft EIR states that the city cannot ensure it will build any more recreational facilities, so where do you imagine people will have any outdoor recreational areas at all when it adds 65,000+ more people?

I58-14

12. The Draft UC Community Plan had “Community Goals”. The city’s revised Plan Update eliminates all those goals and only lists “City of San Diego Goals.” Why?

I58-15

13. The Draft EIR discusses current fire station placement but does not say where new fire stations will be build to serve the added population in UC. Explain how this is being addressed.

I58-16

14. UC is already short of police coverage and we are already far behind city targets. Why have additional police force or stations not been offered? And what has the official response been from the Police Department?

I58-17

15. In the Community Engagement document, no mention is made of the petition submitted by UC PEEPS in March 2023 with close to 2,200 signatures objecting to the city’s proposed plans; in fact, we received no response from city officials about that petition whatsoever. No mention is made of the three large-scale protests against the city’s high-density housing plans held in UC and across the city. No mention is made of the thousands of letters submitted by community residents to city officials opposing their Plan Update. No mention was made of the extensive media coverage generated against the city’s proposed Plan Update. Why was this not included in the Community Engagement document?

I, along with many other members of the UC community, await your responses.

Sincerely,

Bonnie Kutch  
Resident & Property-Tax Paying Homeowner, University City



Bonnie Kutch | University City Peeps | [www.ucpeeps.org](http://www.ucpeeps.org) |619.299.1010

**I58: Response to Bonnie Kutch Comment Letter**

**I58-1:** The comment is an introduction to the comment letter and the commenter's general concerns.

**I58-2:** This comment has been noted. The City of San Diego is taking into account all of the comments, questions, and concerns related to the proposed project by all individuals, organizations, and agencies during the 45-day public review period.

**I58-3:** See response to comment O13-5 under comment letter O13.

**I58-4:** See response to comment I8-7 under comment letter I8 in regards to the concern about rezoning two shopping centers along Regents Road (the Sprouts shopping center at Regents Road and Governor Drive and the Vons Shopping Center at Genesee Avenue and Governor Drive).

Transportation impacts are analyzed in Section 4.14 of the Draft PEIR. Since the passage of Senate Bill (SB) 743 in 2018, CEQA Guidelines Section 15064.3 no longer uses auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Vehicle Miles Traveled (VMT) is the metric for determining potential transportation impacts under CEQA. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020. Per California Public Resources Code Section 21099, parking and congestion concerns are not a part of the environmental review process. Therefore, the comments about congestion are noted, but as they are not part of the environmental review process, no further response is necessary.

**I58-5:** Aesthetic impacts, including those related to the scale and bulk of future development in accordance with the University CPU, are discussed in Section 4.1.4 of the Draft PEIR. While privacy is not part of environmental review, this concern has been noted. Aesthetic impacts are considered to be significant at the program-level of review for projects that are not within a Transit Priority Area (TPA). Likewise, impacts related to public services (e.g. schools, police and fire stations, and libraries) in Section 4.12.4 of the Draft PEIR, and noise in Section 4.11.4 of the Draft PEIR were found to be significant at a program-level of review. Individual development projects requiring discretionary review would be required to assess aesthetic, public services, and noise impacts. Also, see response to comment I8-7 under comment letter I8.

**I58-6:** See response to comment O13-4 under comment letter O13.

**I58-7:** See response to comment I13-3 under comment letter I13 and response to comment O11-22 under comment letter O11 regarding the concern for funding public service and infrastructure.

Further, developers would be required to pay Citywide Park Development Impact Fees (DIFs), which could go towards the development and maintenance of parks and recreational facilities within the University CPU area, or provide public parks consistent with the San Diego Municipal Code (SDMC) Section 142.0640(b)(8)(A-F), as detailed in Section 4.13.2.2c of the Draft PEIR. Future discretionary development projects proposed in accordance with the University CPU would also be required to determine potential impacts to park and recreational facilities and demonstrate consistency with the



University CPU and the City's Parks Master Plan policies which would support provision of parks in the future.

**I58-8:** See response to comment O13-2 under comment letter O13.

**I58-9:** See response to comment O15-5 under comment letter O15. The existing single-family homes in the University CPU area would remain as they are as there are no proposed changes to the number of single-family housing units (see Table 3-5 in the Draft PEIR).

Additionally, the proposed University CPU contains policies regarding enhancements that make multi-family housing appropriate for a wide range of personal needs, including those of families with children. See specifically University CPU Plan policies 1.1(I) and 1.2(A-H).

Focusing on building higher-density housing in urban areas, especially those near transit hubs, would give community members the opportunity to use alternative modes of transportation.

**I58-10:** Comment noted. The Complete Communities program is not a part of the scope of the project analyzed in the Draft PEIR and the environmental impacts of the Complete Communities program were addressed in Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003). The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I58-11:** The commenter is concerned that the project would not provide enough retail for the residents in University City. As described in Table 3-4 of the Draft PEIR, the proposed University CPU would allow for approximately 6,236,000 additional square feet of retail space over the existing approximately 1,721,000 square feet. The increase in retail square footage is consistent with the following project objective:

Provide options for services and amenities, such as shopping and grocery stores, public spaces, and parks and recreation facilities closer to homes so that most daily needs can be met through a short walk, bike, or transit ride.

Providing retail and other amenity services in the form of mixed-use villages is also a goal of the City's City of Villages strategy, which is implemented as part of the General Plan and which is proposed in the University CPU (see Section 4.10 of the Draft PEIR). Any future project-level discretionary development projects would be required to undergo environmental review that would require a demonstration of consistency with the City's General Plan policies regarding land use. Additionally, within the University CPU's Community Plan Implementation Overlay Zone (CPIOZ)-Type A area, development with a residential use on a property designated community village would be required to comply with Supplemental Development Regulation (SDR)-H.1 which requires the development to maintain space for commercial services and retail sales uses such as food, beverage, and /or grocery use.

Reducing VMT is an overall goal of the City's Climate Action Plan (CAP), the Blueprint SD Initiative, and both the University CPU and the Hillcrest Focused Plan Amendment (FPA). Providing opportunities for retail land uses in proximity to existing and proposed housing is one of the proposed strategies to help the City meet its greenhouse gas (GHG) goals.

**I58-12:** The commenter raises a question about the San Diego Association of Government's (SANDAG's) forecasted population growth of San Diego between 2022 and 2050. It is not clear whether the commenter means the City of San Diego or the County of San Diego. The most recent population projection from SANDAG is the Series 14 projection; the Series 15 Forecast is still in a draft state and is not an appropriate tool to use. For the City of San Diego, this model projects an increase in population of 222,124 people from 2016 to 2050 (SANDAG Forecast Reports, 2022). The projected population increase for University between 2020 and 2050 would be approximately 65,360 (population projections for the University CPU are found in Section 4.13.1.1.c). See response to comment O15-5 under comment letter O15 regarding the proposed density in the University CPU. The comment has been noted by the City. As it does not raise a specific concern about the adequacy of the environmental analysis of the Draft PEIR, no further comment is required.

**I58-13:** See response to comment I13-11 under comment letter I13.

**I58-14:** See response to comment I13-12 under comment letter I13.

**I58-15:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I58-16:** See response to comment I13-5 under comment letter I13.

**I58-17:** See response to comment I13-17 under comment letter I13.

**I58-18:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

# Comment Letter I59 - Christina Laurin

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL]  
**Date:** Thursday, April 25, 2024 1:27:52 PM  
**Attachments:** [~WRD0002.jpg](#)

**From:** Christina Laurin <claurin619@gmail.com>  
**Sent:** Thursday, April 25, 2024 12:54 PM  
**To:** CouncilMember Kent Lee <KentLee@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>; ncausman@sandiego.cov; Lukes, Suchitra <SLukes@sandiego.gov>; tomlins@sandiego.gov  
**Subject:** [EXTERNAL]

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Dear representatives

As a University City resident I am contacting you to express my objections regarding several areas of the City’s recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the ‘Housing Action Plan’ part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I59-1

## Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic “models” were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls “complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I59-2

I59-3

I59-4

## Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I59-5

## New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

I59-6

### Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

I59-7

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

### Planning Deficiencies in Parks

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

I59-8

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

I59-9

**The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.**

I59-10

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

I59-11

Christina Laurin  
8285 Avenida Navidad, Unit 1  
San Diego, C 92122  
Cambridge Terrace Resident

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**Christina Laurin Error! Filename not specified.**

C. Laurin Arts, LLC

Graphic Art/Web Design

619.277.3783 **Error! Filename not specified.**

<http://www.claurin.com>

**I59: Response to Christina Laurin Comment Letter**

**I59-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted and no response required.

**I59-2:** See response to comment I8-2 under comment letter I8.

**I59-3:** See response to comment I8-3 under comment letter I8.

**I59-4:** See response to comment I8-4 under comment letter I8.

**I59-5:** See response to comment I8-5 under comment letter I8.

**I59-6:** See response to comment I8-6 under comment letter I8.

**I59-7:** See response to comment I8-7 under comment letter I8.

**I59-8:** See response to comment I8-8 under comment letter I8.

**I59-9:** The comment generally addresses overall concerns with the proposed University Community Plan Update. It does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is necessary.

**I59-10:** The comment is about a previous project that is not a part of the project evaluated in the Draft PEIR. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

**I59-11:** The comment has been noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I60 - Andrea Lehman

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:07:17 AM

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**From:** Andrea Lehman <adlehman@att.net>  
**Sent:** Sunday, April 28, 2024 10:46 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I60-1

I60-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I60-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

I60-4

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA

I60-5

requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I60-5 cont.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I60-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I60-7

I60-8

Sincerely,  
Andrea Lehman  
92122 Homeowner since 2008  
Mother of three local schoolchildren



**I60: Responses to Andrea Lehman Comment Letter**

**I60-1:** See response to comment O13-1 under comment letter O13.

**I60-2:** See response to comment O13-2 under comment letter O13.

**I60-3:** See response to comment O13-3 under comment letter O13.

**I60-4:** See response to comment O13-4 under comment letter O13.

**I60-5:** See response to comment O13-5 under comment letter O13.

**I60-6:** See response to comment O13-6 under comment letter O13.

**I60-7:** See response to comment O13-7 under comment letter O13.

**I60-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I61 - Dan Linder

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Stop reduction of Governor dr Lanes  
**Date:** Tuesday, April 30, 2024 9:27:21 AM

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-----Original Message-----

From: Dan Linder <dlinder999@gmail.com>  
Sent: Monday, April 29, 2024 6:20 PM  
To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
Cc: Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
Subject: [EXTERNAL] Stop reduction of Governor dr Lanes

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To Whom It May Concern:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I61-1

I61-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I61-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I61-4

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I61-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the

I61-6

decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I61-6  
cont.

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts : The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I61-7

I61-8

Dan Linder  
6239 Radcliffe dr.  
San Diego, CA 92122

**I61: Responses to Dan Linder Comment Letter**

**I61-1:** See response to comment O13-1 under comment letter O13.

**I61-2:** See response to comment O13-2 under comment letter O13.

**I61-3:** See response to comment O13-3 under comment letter O13.

**I61-4:** See response to comment O13-4 under comment letter O13.

**I61-5:** See response to comment O13-5 under comment letter O13.

**I61-6:** See response to comment O13-6 under comment letter O13.

**I61-7:** See response to comment O13-7 under comment letter O13.

**I61-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I62 - Sandy Lippe

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University City overbuilding is underwhelming  
**Date:** Tuesday, April 30, 2024 9:31:12 AM

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-----Original Message-----

From: Sandy Lippe <[sandylippe@gmail.com](mailto:sandylippe@gmail.com)>  
Sent: Monday, April 29, 2024 10:33 PM  
To: PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
Cc: CouncilMember Joe LaCava <[JoeLaCava@sandiego.gov](mailto:JoeLaCava@sandiego.gov)>  
Subject: [EXTERNAL] University City overbuilding is underwhelming

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Dear Joe and CEQA Planning Group,

I am hoping you will speak up for University City in regard to the misguided over planning. You know that we have U C folks who worked hard to make this community one of the best kept secrets in San Diego even though La Jolla name is all over North U.C. Check the U.T. sometime. If there is a murder or rape, it happens in University City. If it is a new opening of a high end store or hotel. It is La Jolla.

You no longer represent U.C. on the Council since our community was moved from District I to 6.  
Help us out, Joe, the way you did before the change, but I will save that for another day

Why make it into a city instead of the close knit community.? We are not selfish. We worked hard to make this a hometown in San Diego.

Mayor Gloria is not like Councilman Todd who fought against Mayor Sanders when he found closing the libraries an easy fix for the financial crisis in 2009. Councilman Todd fought hard for the libraries and he and others won. What happened?

I thought the public brought ideas to their council representatives to help communities instead of demanding whatever the mayor esntd.

Please reconsider and do the right thing for University City.

Warm regards,

Sandy Lippe

A resident of U.C. since 1975 and a retired, long time volunteer with no pension..

Sandy Lippe

858-945-2387

Sent from my iPhone

I62-1

**I62: Response to Sandy Lippe Comment Letter**

**I62-1:** Comment noted. The comment does not pertain to the adequacy of the Draft Program Environmental Impact Report. No further response is necessary.

## Comment Letter I63 - Eric Lowenhaupt

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] UC Plan Update Comments  
**Date:** Tuesday, April 30, 2024 9:23:33 AM

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**From:** Eric Lowenhaupt <[ericl@san.rr.com](mailto:ericl@san.rr.com)>  
**Sent:** Monday, April 29, 2024 3:42 PM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Subject:** [EXTERNAL] UC Plan Update Comments

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I am opposed to the University Community Plan in general and specifically to its proposed changes to Governor Drive and the zoning changes that permit accessory dwelling units and the proposed changes to the Vons and Sprouts shopping centers.

I63-1

Sincerely,

Eric Lowenhaupt  
[ericl@san.rr.com](mailto:ericl@san.rr.com)

I have reviewed the Plan PDF and the six supporting documents provided at <https://www.planuniversity.org/> and identified a number of issues including but not limited to:

1. The plan has the flavor of a velvet glove marketing advertisement supporting a predetermined course of action, not a well-considered evaluation of possible options and their consequences. Worse, it does not appear to take the interests and concerns of current residents into account.
2. The plan does not appear to consider why people choose to live in University City (UC); rather it assumes people live near where they work.
  - a. UC is a community of mostly longtime residents, not transients. The plan contains no analysis of why people choose to live in UC or whether the proposed changes will detrimentally impact their chosen lifestyle.
  - b. There is no analysis of how many working people who live in UC work in UC. Nor is there any consideration of how many people who work in UC live elsewhere.
  - c. In the 37 years I have lived in UC, I have held seven different jobs at 11 different work locations, none of which were in UC. Likewise, my late wife, who worked full time, never worked in UC. Further, few of my neighbors work in UC.
  - d. One of the UC advantages, at least west of Genesee and alluded to in Figure 33 – Heat Exposure Index – but not explained, is the summertime cooling breezes caused by the compounding effects of the ocean and Mt. Soledad. The plan does not consider whether the proposed zoning changes will introduce an Urban Heat Island effect that neutralizes Nature’s cooling.
3. The Plan fallaciously assumes people will walk, ride bicycles, or take public transportation

I63-2

I63-3

I63-4

I63-5

I63-6

when traveling to work, shopping, or other destinations:

- a. The plan needs to consider and quantify why people drive vehicles rather than use alternatives. For example, many jobs require use of a personal vehicle.
  - b. California has already implemented bicycle lane laws. Yet there is no notable increase in the use of bicycles.
    - i. The most likely explanation is not the lack of buffering from vehicular traffic but rather the old adage that time is money. The average bicycle speed (per Google) is ~12 MPH. Non-freeway traffic is two to four times as fast.
    - ii. Most purchases made at grocery, department, and hardware stores are not easily transported on bicycles (or by walking or riding buses).
  - c. The cost of housing in UC is a major indicator that the people living in UC belong to the professional working class. As such they are generally expected to wear appropriate work attire that is not compatible with walking or bicycling to work on hot or rainy days.
  - d. The Plan levies a burdensome “time tax” on residents by attempting to impose the use of walking, riding bicycles or using public transit. There is no way that driving a personal vehicle compares timewise to walking to a bus stop, waiting for the bus, then waiting through the multiple pickup stops for other riders, waiting at transit route changes, and finally walking the remaining distance to ones work location. Time is a precious to families with much of it consumed by necessary activities of getting dressed, feeding kids, preparing lunches, work, school, etc. etc. Imposing increased travel time either by mandating use of public transit or by restricting vehicular road access will increase the general level of stress, anxiety and anger with fairly predictable results.
  - e. The plan grossly inflates vehicular transit time to justify public transit:
    - i. Page 63 of the March 2024 Draft Mobility Technical Report erroneously states “It can take anywhere from 17.7 to 25.3 minutes to travel by vehicle across the length of the corridor [Governor Drive].” On a Wednesday at 12:20 in the afternoon, I drove the entire ~2.5 mile length from 805 to Stresemann in moderate traffic in 6 minutes and 27 seconds while adhering to posted speed limits and stopping at yellow and red lights.
    - ii. Page 63 then falsely concludes “The results indicate that taking transit is a comparable option to driving a vehicle...” This morning it took my son 17 minutes to walk to the nearest bus stop on Governor. In seventeen minutes, I can generally drive anywhere in the UC planning area.
4. The Plan identifies a number of new parks but lacks evidence they will be used. Worse, it does not address maintenance costs.
  5. The Plan imposes a higher population density but does not address the inevitable increase in crime. This is especially important as walking, bicycling, or use of public transit, especially in off-hours, increases ones vulnerability to criminal activity and is thus a major deterrent to using alternate modes of transportation.
  6. The Plan states a policy of “Maintain[ing] sufficient fire-rescue and police services to meet demands of continued growth and development...” but does not attempt to extrapolate the costs of added police and fire protection required by an increased population density or more

**I63-6  
cont.**

**I63-7**

**I63-8**

**I63-9**

**I63-10**

**I63-11**



- importantly a change in population makeup.
7. The University Community Plan and Local Coastal Plan (March 2024) states on page 157 that HEPA filters can attenuate vehicular air pollution. This is false and harmful information: HEPA filters are effective against particulate matter larger than 0.3 microns, not gases such as CO<sub>2</sub>, carbon monoxide, nitrous oxides, sulfur dioxide, or VOCs. **I63-11  
cont.**
  8. The Plan contains far too many non sequitur and/or generalization fallacies such as “Governor Drive will be improved with traffic calming and buffered bike lanes so that residents can safely access key facilities in the area, including the various schools, recreation centers, and the University Community Branch Library.” There is no supporting evidence that the changes to Governor will increase utilization of these resources or improve safety of access. **I63-12**
  9. The University Community Plan Update – Draft Mobility Technical Report (March 2024) contains 84 references to Hillcrest and significant amounts of Hillcrest data. Why? Hillcrest is not in the University Planning area as identified in Figure 1-1 on page 5 of the Plan update. **I63-13**
  10. Page 8-1 (Draft Mobility Technical Report (March 2024)) discusses Intelligent Transportation Systems (ITS) and identifies four roads to have coordinated traffic signals. Why aren’t Governor, Nobel, and other roads included? Vehicular CO<sub>2</sub> emissions are a direct function of fuel efficiency which is adversely impacted by stop and go traffic as evidenced by the difference in highway and city MPG. If, as one of the Plan’s stated goals is to reduce CO<sub>2</sub>, then it seems imperative to determine the amount of CO<sub>2</sub> reduction that could be achieved by implementing ITS on all roads with multiple traffic lights before attempting to modify citizen behavior. **I63-14**
  11. The proposed changes to Governor Drive appear to include average weekday peak usage data but do not address the occasional high volumes that inevitably occur. More importantly, given that I frequently see or hear complaints about traffic on Governor on Nextdoor.com and elsewhere, it seems ridiculous to propose “traffic calming” measures that can only make traffic conditions worse by restricting traffic flow. **I63-15**
  12. The Plan frequently uses the term “traffic calming” measures but does not address whether these measures can be traffic enraging under average peak or extraordinary peak conditions. I have been stuck on Governor through multiple light changes at the Genesee intersection due to parents picking up their children at Standley Middle School. **I63-16**
  13. Further, the Plan does not discuss the impact of the Governor changes in the event of an emergency requiring an evacuation. For South University, the only evacuation routes are Genesee north and 805 if 52 is blocked by fire. What if there is a train derailment that releases toxic gas in Rose Canyon? Does the plan permit authorities to completely block traffic on one side of Governor while temporarily making the other side two-way? **I63-17**
  14. One of the problems I frequently face while driving on Governor are slowpokes doing 15 or 20 MPH in a 35 MPH zone. Currently, I can pass them. Under the Plan I will be stuck fuming. **I63-18**
  15. The water distribution capacity under the proposed plan is vaguely addressed on page 167 of the University Community Plan and Local Coastal Plan (March 2024) by the statement “Significant infrastructure is not required to serve the potential buildout of the Community Plan. However, as individual development projects are undertaken, it is anticipated that site specific studies will be required....” Given the Plan includes rezoning to provide more living space, this is an abdication of planning responsibility as the current system almost certainly has capacity limits. **I63-19**
  16. The plan identifies tree planting and the various species to be used. Who will pay for the **I63-20**

trees and who will maintain them? Also, the Jacaranda tree is an extremely messy tree whose flower “nectar” ruined the finish on one of my cars.

**I63-21  
cont.  
I63-22**

17. The Plan does not appear to have obtained any input from Sprouts or Vons on the proposed zoning changes. If either or both close, it will force people to drive further for groceries.

18. The Plan calls for tree plantings, more parks, street facing stores, plazas, etc., etc., but it does not address who will pay for the changes. Further, it does not assess whether the policy mandates will adversely affect stores already pinched financially by shoplifting and minimum wage hikes. If the stores own the publically accessible open space, it is non-revenue generating square footage.

**I63-23**

19. Parking is a major issue in UC. Many of the homes built in the 60’s and 70’s are small and lack basements and attics. Garages are used for storage, hobby activities, or are even converted into living space. Allowing multiple units on a parcel of land will only increase street parking and make driving more dangerous.

**I63-24**

**I63: Response to Eric Lowenhaupt Comment Letter**

**I63-1:** The comment is an introduction to the commenter's main concerns as described in the comment letter.

**I63-2:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I63-3:** This comment is about the scope of the University Community Plan Update (CPU) and does not raise an issue related to the adequacy of the Draft PEIR. No further response is required.

**I63-4:** This comment is about the scope of the University CPU and does not raise an issue related to the adequacy of the Draft PEIR. No further response is required.

**I63-5:** This comment does not raise an issue related to the adequacy of the Draft PEIR. Heat island effect—the increase in air temperature experienced in urbanized areas—is not an issue that is required to be studied under CEQA. It should be noted, however, that the University CPU includes a discussion of best practices for alleviating the effects of urban areas on air temperature, including planting street trees, promoting urban greening, and using cool pavements per Policy 7.8(A). These efforts can help reduce urban heat islands while cooling zones and resilience hubs can provide respite from the heat as proposed in Policy 7.8(B)-(D).

**I63-6:** This comment is about individual preferences for modes of transportation and does not raise an issue related to the adequacy of the Draft PEIR. A goal of the University CPU is to provide opportunities for alternative modes of transportation to be used through the planning of mobility infrastructure and the provision of more housing in proximity to employment opportunities. An overarching goal of the Blueprint SD Initiative, University CPU, and Hillcrest Focused Plan Amendment (FPA) is to further the implementation of the City's General Plan, Bicycle Master Plan, and Climate Action Plan (CAP) and support a mode shift from single occupancy vehicles to alternative mobility options such as walking/rolling, biking, and transit. The University CPU directly supports the City's General Plan policies to encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking/rolling (Policy CE-F.6); and encourage large residential, mixed-use, and employment development to have site designs and on-site amenities that support alternative modes of transportation (Policy ME-G.6). Additionally, the University CPU would directly support implementation of the City's CAP Strategy 3 goals that support mode shift through the University CPU's land use strategy and through mobility investments and programs that address travel behavior.

**I63-7:** This comment is about the Draft Mobility Technical Report, which was a document prepared to inform mobility decisions for the University CPU, but is not a part of the University CPU and was not analyzed in the Draft PEIR. The transportation analysis in the Draft PEIR is based on the Vehicle Miles Traveled (VMT) Analysis (Appendix J) prepared for the Blueprint SD Initiative, University CPU, and Hillcrest FPA. Transportation impacts are addressed in Section 4.14 of the Draft PEIR.

**I63-8:** Comment noted.

**I63-9:** As discussed in Section 4.13 of the Draft PEIR, implementation of the University CPU could increase the demand for parks and recreational facilities and could require the construction and/or expansion of parks and recreational facilities in the University CPU area. The City's Parks Master Plan (PMP) established a new park standard, known as the Recreational Value-Based Park Standard, which establishes a point value to represent recreational opportunities within population-based parks to assess the need for upgrades and new park facilities. As future development is proposed, individual private developments would be required to either pay Citywide Park DIFs or provide public parks consistent with SDMC Section 142.0640(b)(8)(A-F), as detailed in Section 4.13.2.2c. Funding sources for ongoing maintenance of public parks are discussed in the PMP (2021) and the Citywide Park Development Impact Fee Nexus Study (2021).

**I63-10:** Crime is not a part of CEQA analysis; however, the potential impact to police service impacts is addressed in Section 4.12.4, Issue 1(b), of the Draft PEIR.

**I63-11:** The impacts on police and fire services are discussed in Section 4.12.4 in the Draft PEIR. The Draft PEIR acknowledges that the proposed project has significant impacts related to public services (e.g., fire, police, library, and school services). Because this is a program-level environmental analysis, the specific locations, sizing, and capacity of future public service development projects are not known at this time. The San Diego Police Department and the San Diego Fire Department would be consulted for future project-level development projects and their input for the need for new services would be incorporated into future project designs and/or mitigation measures, as applicable.

**I63-12:** This comment is about the scope of the University CPU and does not raise an issue related to the adequacy of the Draft PEIR. No response is necessary. Air quality impacts are discussed in Section 4.2.4 of the Draft PEIR.

**I63-13:** See response to comment O13-1 under comment letter O13.

**I63-14:** This comment is about Appendix I of the Draft Mobility Technical Report, which was a document prepared to inform mobility decisions for the Draft University CPU, but is not part of the University CPU and was not analyzed in the Draft PEIR. The traffic assessment of the Draft PEIR is based on the VMT Analysis (Appendix J) prepared for the Blueprint SD Initiative, University CPU, and Hillcrest FPA. Transportation impacts are addressed in Section 4.14 of the Draft PEIR.

**I63-15:** This comment is about the Draft Mobility Technical Report, which was a document prepared to inform mobility decisions for the Draft University CPU, but is not part of the University CPU, and was not analyzed in the Draft PEIR. The traffic assessment of the Draft PEIR is based on the VMT Analysis (Appendix J) prepared for the Blueprint SD Initiative, University CPU, and Hillcrest FPA. Transportation impacts are addressed in Section 4.14 of the Draft PEIR. In regard to the comments on air pollution, see Section 4.2.4 of the Draft PEIR.

**I63-16:** Transportation impacts are discussed in Section 4.14, Transportation, of the Draft PEIR. Since the passage of Senate Bill 743 in 2018, CEQA Guidelines Section 15064.3 no longer uses parking, auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. VMT is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3,

statewide application of the new VMT metric was required as of July 1, 2020. With the implementation of this new threshold, parking and traffic congestion concerns are issues that are not required to be studied as a part of the environmental review process. See response to comment O13-1 under comment letter O13 regarding the proposed changes to Governor Drive.

**I63-17:** This comment about Governor Drive has been noted. See response to comment O13-1 under comment letter O13.

**I63-18:** See response to comment O13-3 under comment letter O13.

**I63-19:** This comment is noted.

**I63-20:** As discussed in Section 4.16.4 Issue 1(c) of the Draft PEIR, the potable water distribution system is continually upgraded and repaired on an ongoing basis through the City's Capital Improvements Program. These improvements are determined based on continuous monitoring by the City's Engineering & Capital Project's Engineering Division and improvements are provided to the water system as needs are identified. As future development is implemented at the project-level, consistent with the University CPU, each individual project would be required to evaluate the physical impacts of development, including impacts associated with new or expanded water distribution facilities.

**I63-21:** This comment is about the scope of the University CPU and does not raise an issue related to the adequacy of the Draft PEIR. No response is necessary. It should be noted that tree plantings are provided and maintained by the City of San Diego's Street Tree Division.

**I63-22:** This comment is about the scope of the University CPU and does not raise an issue related to the adequacy of the Draft PEIR. The proposed land designation of these sites as Community Village Med-3 and the rezoning of the shopping center at Regents Road and Governor Drive (the Sprouts shopping center) and the one at Genesee Avenue and Governor Drive (the Vons shopping center) to (Commercial—Community) CC-3-8 would not prevent either grocery store from remaining onsite. This zoning is for mixed commercial and residential use. As described in the University CPU, the Community Village Med-3 land use designation allows for commercial, office, and multi-family residential uses, including mixed-use with office or residential space above retail space, with an emphasis on employment uses. Also, see response to comment I8-7 under comment letter I8.

**I63-23:** For trees, see response to comment I63-21. For parks, see the discussion in Section 4.13 of the Draft PEIR. This comment is about the scope of the University CPU and does not raise an issue related to the adequacy of the Draft PEIR. No further response is necessary.

**I63-24:** See response to comment I63-I6.

## Comment Letter I64 - Zdravko Lukic

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] comments to the City of San Diego's University Community Plan  
**Date:** Tuesday, April 30, 2024 9:11:46 AM

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**From:** Zdravko Lukic <zdravko.lukich@gmail.com>  
**Sent:** Sunday, April 28, 2024 8:24 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] comments to the City of San Diego's University Community Plan

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

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To Whom It May Concern: Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. **I64-1**

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant. **I64-2**

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not. **I64-3**

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative. **I64-4**

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a **I64-5**

**I64-6**

program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update. VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts : The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I64-6  
cont.

I64-7

I64-8

Thank you for the consideration. As a large family we are strongly affected by these unnecessary changes to our community given that we need a quick and fast access to our schools and work places.

I64-9

Sincerely,  
Zdravko Lukic  
Santa Cocepcion Huerta Olivares

Address: 6682 Red Deer St, San Diego, 92122

**I64: Responses to Zdravko Lukic Comment Letter**

**I64-1:** See response to comment O13-1 under comment letter O13.

**I64-2:** See response to comment O13-2 under comment letter O13.

**I64-3:** See response to comment O13-3 under comment letter O13.

**I64-4:** See response to comment O13-4 under comment letter O13.

**I64-5:** See response to comment O13-5 under comment letter O13.

**I64-6:** See response to comment O13-6 under comment letter O13.

**I64-7:** See response to comment O13-7 under comment letter O13.

**I64-8:** See response to comment O13-8 under comment letter O13.

**I64-9:** Comment noted.



## Comment Letter I65 - Alan Lutze

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 8:41:38 AM

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**From:** Alan Lutze <a\_lutze@yahoo.com>  
**Sent:** Friday, April 26, 2024 10:30 AM  
**To:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com; PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I65-1

I65-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I65-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed.

I65-4

In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

I65-4 cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

I65-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I65-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts : The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I65-7

I65-8

Sincerely  
Alan Lutze  
6421 Dennison St  
San Diego, CA. 92122

**I65: Responses to Alan Lutze Comment Letter**

**I65-1:** See response to comment O13-1 under comment letter O13.

**I65-2:** See response to comment O13-2 under comment letter O13.

**I65-3:** See response to comment O13-3 under comment letter O13.

**I65-4:** See response to comment O13-4 under comment letter O13.

**I65-5:** See response to comment O13-5 under comment letter O13.

**I65-6:** See response to comment O13-6 under comment letter O13.

**I65-7:** See response to comment O13-7 under comment letter O13.

**I65-8:** See response to comment O13-8 under comment letter O13.

**Comment Letter I66 - Mark and Meleen Michalek**

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Quit trying to destroy UC with overreaching Community Plan DEIR  
**Date:** Tuesday, April 30, 2024 9:15:36 AM

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**From:** michalek1@aol.com <michalek1@aol.com>  
**Sent:** Monday, April 29, 2024 8:47 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>  
**Subject:** [EXTERNAL] Quit trying to destroy UC with overreaching Community Plan DEIR

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To Whom It May Concern:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I66-1

I66-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I66-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the

I66-4

school district’s memorandum was incorporated into the DEIR, but this statement was not.

I66-4 cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

I66-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I66-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts : The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I66-7

I66-8

Mark and Meleen Michalek  
2958 Renault Street, San Diego, CA 92122

**I66: Responses to Mark and Meleen Michalek Comment Letter**

**I66-1:** See response to comment O13-1 under comment letter O13.

**I66-2:** See response to comment O13-2 under comment letter O13.

**I66-3:** See response to comment O13-3 under comment letter O13.

**I66-4:** See response to comment O13-4 under comment letter O13.

**I66-5:** See response to comment O13-5 under comment letter O13.

**I66-6:** See response to comment O13-6 under comment letter O13.

**I66-7:** See response to comment O13-7 under comment letter O13.

**I66-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I67 - Robert Morrison

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University City PEIR Comments  
**Date:** Tuesday, April 16, 2024 9:04:57 AM

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**From:** Bob Morrison <rfmorrison@jps.net>  
**Sent:** Sunday, April 14, 2024 6:17 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] University City PEIR Comments

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Dear Sirs/Madames,

I have been a resident of South University City for over 40 years. As a result, I have seen major change in our community. It has grown from a new residential area that our realtor called 'North County' to in essence a stand-alone city with its own shopping, residences, business, educational system (primary school to PhD), etc. If it had been maintained as a residential area only with the supporting elementary shopping areas, I can see why the NIMBYs would question the subject proposal. It hasn't stayed as a residential area and, thus, needs to grow and continue to support what it has become. The time to have stopped progress in this direction was in the early to middle 1970s before that growth started. Now, we need to evolve to become a better, more concentrated city within a city. The PEIR seems to me to be a reasonable way to get this done.

I67-1

In addition, South University City isn't an area of only individual family homes today. We already have condominiums and apartments in the Eastern portion of University City. In addition, my area of the city is filled with group homes of 5-8 (the 8 is not appropriate but is done.) students and young professionals. I can nearly throw a stone and hit 4 of those group homes from my home. While UCSD is building many new units to house students, those new units won't come close to housing all of today's needs in addition those that the UCSD student growth projections will require. I would bet that the number of group homes in South University City will continue to grow to meet the demand AND make a lot of money for the owners.

I67-2

I support the subject PEIR.

R. F. Morrison

Robert Morrison, PhD

6137 Syracuse Way

San Diego, CA 92122

<[rfmorrison@jps.net](mailto:rfmorrison@jps.net)>

(858) 455-0649



**I67: Responses to Robert Morrison Comment Letter**

**I67-1:** Comment noted. The comment is in general support of the Draft Program Environmental Impact Report (PEIR) and does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I67-2:** Please refer to response to comment I67-1.

## Comment Letter I68 - Emilee Mullen

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University Community Plan  
**Date:** Monday, April 22, 2024 8:40:47 AM

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-----Original Message-----

From: Emilee Mullen <[emileelynn@gmail.com](mailto:emileelynn@gmail.com)>  
Sent: Sunday, April 21, 2024 5:54 PM  
To: PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
Subject: [EXTERNAL] University Community Plan

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Good afternoon,

I am a UCSD graduate and a longtime former resident of University City, and I would like to voice my support for the draft UC Community Plan - in particular the high density housing near the existing Blue Line.

Housing affordability is a critical issue for most younger San Diegans and those thinking of starting a family. Please retain these plans to increase housing in the area.

Regards,  
Emilee Mullen

I68-1

**I68: Response to Emilee Mullen Comment Letter**

**I68-1:** Comment noted. The comment is in general support of the proposed University Community Plan Update and does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I69 - Marion Nebiker

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University City Plan Update  
**Date:** Tuesday, April 30, 2024 9:15:07 AM

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**From:** mnebiker@att.net <mnebiker@att.net>  
**Sent:** Monday, April 29, 2024 8:10 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] University City Plan Update

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The concept of reducing Governor Drive from four lanes to two lanes while increasing population in the area is not only unpractical, it is irresponsible. When was the last time anyone from the planning department or city council drove on Governor Drive when one of the three schools located on Governor Drive let out. And if the proposed development of the two shopping centers into high rise residence units, the traffic will only increase and residents will have to drive further for services.

I69-1

I69-2

Marion Nebiker

**I69: Response to Marion Nebiker Comment Letter**

**I69-1:** Comment noted. This comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I69-2:** Comment noted. The rezoning of the shopping center at Regents Road and Governor Drive (the Sprouts shopping center) and the one at Genesee Avenue and Governor Drive (the Vons shopping center) to Commercial-Community (CC)-3-8 would not prevent either grocery store from remaining onsite. The CC-3-8 zone permits community-serving commercial services, retail uses, and residential uses and, as described in the University Community Plan Update, the Community Village Medium-3 land use designation allows for commercial, office, and multi-family residential uses, including mixed-use with office or residential space above retail space, with an emphasis on employment uses. This comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I70 - Rita Newell

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] UC two lanes  
**Date:** Tuesday, April 30, 2024 9:16:00 AM

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-----Original Message-----

From: Rita Newell <[ritanewell13@yahoo.com](mailto:ritanewell13@yahoo.com)>  
Sent: Monday, April 29, 2024 8:37 AM  
To: PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
Subject: [EXTERNAL] UC two lanes

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I can't believe you are trying to make the only main road in University City, Governors Drive, a two lane road. Do you know when asked at a meeting with Planing Committee representatives what will happen when Emergency vehicles need to drive down Governors Drive the answer was, they will drive in the bike lanes. Was that meant to be a joke? Rita Newell. 2619 Angell Ave, SD 92122

I70-1

**I70: Response to Rita Newell Comment Letter**

**I70-1:** See response to comment O13-1 and O13-3 under comment letter O13.

## Comment Letter I71 - Alain Noncovich

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Concerns Regarding City's Environmental Impact Report and Housing Development Plans  
**Date:** Tuesday, April 30, 2024 9:20:22 AM

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**From:** Alain Noncovich <noncovich@gmail.com>  
**Sent:** Monday, April 29, 2024 12:19 PM  
**To:** CouncilMember Kent Lee <KentLee@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; tomlins@sandiego.gov  
**Subject:** [EXTERNAL] Concerns Regarding City's Environmental Impact Report and Housing Development Plans

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Dear Representatives,

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I71-1

### Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I71-2

I71-3

I71-4

### Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I71-5

### New High-Rise Apartments Planned for Genesee and Nobel Drive

I71-6



Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

I71-6  
cont.

### **Vons & Sprouts Centers New Height and Sharply Higher Density Allowances**

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

I71-7

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

### **Planning Deficiencies in Parks**

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

I71-8

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

I71-9

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

I71-10

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

I71-11

--

Alain Noncovich - member of HOA Cambridge Terrace Owners Association

**I71: Response to Alain Noncovich Comment Letter**

**I71-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted and no further response is required.

**I71-2:** See response to comment I8-2 under comment letter I8.

**I71-3:** See response to comment I8-3 under comment letter I8.

**I71-4:** See response to comment I8-4 under comment letter I8.

**I71-5:** See response to comment I8-5 under comment letter I8.

**I71-6:** See response to comment I8-6 under comment letter I8.

**I71-7:** See response to comment I8-7 under comment letter I8.

**I71-8:** See response to comment I8-8 under comment letter I8.

**I71-9:** The comment generally addresses overall concerns with the proposed University Community Plan Update. It does not address the adequacy of the environmental analysis in the Draft PEIR. The concerns have been noted; no further response is necessary.

**I71-10:** The comment is about a previous project that is not a part of the project evaluated in the Draft PEIR. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

**I71-11:** The comment has been noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I72 - Noncovich Family

**From:** [Ash-Reynolds\\_Tara](mailto:Ash-Reynolds_Tara) on behalf of [PLN\\_PlanningCEQA](mailto:PLN_PlanningCEQA)  
**To:** [Lombrozo\\_Ari](mailto:Lombrozo_Ari)  
**Subject:** FW: [EXTERNAL] City Planning: Please Consider How It Will Impact Us!!  
**Date:** Thursday, April 25, 2024 1:26:33 PM

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**From:** Kay <kaysandiego@gmail.com>  
**Sent:** Thursday, April 25, 2024 11:49 AM  
**To:** CouncilMember Kent Lee <KentLee@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>; ncausman@sandiego.gov; Lukes, Suchitra <SLukes@sandiego.gov>; tomlins@sandiego.gov  
**Subject:** [EXTERNAL] City Planning: Please Consider How It Will Impact Us!!

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Good afternoon,

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I72-1

### Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I72-2

I72-3

I72-4

### Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I72-5

### New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

172-6

### **Vons & Sprouts Centers New Height and Sharply Higher Density Allowances**

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

172-7

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

### **Planning Deficiencies in Parks**

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

172-8

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

172-9

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

172-10

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

172-11

Best regards,

The Noncovich Family

**I72: Response to the Noncovich Family Comment Letter**

**I72-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted and no further response is required.

**I72-2:** See response to comment I8-2 under comment letter I8.

**I72-3:** See response to comment I8-3 under comment letter I8.

**I72-4:** See response to comment I8-4 under comment letter I8.

**I72-5:** See response to comment I8-5 under comment letter I8.

**I72-6:** See response to comment I8-6 under comment letter I8.

**I72-7:** See response to comment I8-7 under comment letter I8.

**I72-8:** See response to comment I8-8 under comment letter I8.

**I72-9:** The comment generally addresses overall concerns with the proposed University Community Plan Update. It does not address the adequacy of the environmental analysis in the Draft PEIR. The concerns have been noted; no further response is necessary.

**I72-10:** The comment is about a previous project that is not a part of the project evaluated in the Draft PEIR. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

**I72-11:** The comment has been noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I73 - John Perna

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Thursday, April 25, 2024 3:52:29 PM

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**From:** John Perna <johnjperna@gmail.com>  
**Sent:** Thursday, April 25, 2024 2:46 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I73-1

I73-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I73-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area

I73-4



for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

173-4  
cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

173-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

173-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

173-7

173-8

Sincerely,

John J. Perna Resident of UC since 1976  
5865 Dirac St.  
San Diego, CA 92122

**I73: Responses to John Perna Comment Letter**

**I73-1:** See response to comment O13-1 under comment letter O13.

**I73-2:** See response to comment O13-2 under comment letter O13.

**I73-3:** See response to comment O13-3 under comment letter O13.

**I73-4:** See response to comment O13-4 under comment letter O13.

**I73-5:** See response to comment O13-5 under comment letter O13.

**I73-6:** See response to comment O13-6 under comment letter O13.

**I73-7:** See response to comment O13-7 under comment letter O13.

**I73-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I74 - Marlene and Tom Petrie

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: critical comments DEIR & re-zoning  
**Date:** Tuesday, April 30, 2024 9:11:33 AM

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**From:** M Petrie <[mara12rose@hotmail.com](mailto:mara12rose@hotmail.com)>  
**Sent:** Sunday, April 28, 2024 6:05 PM  
**To:** [PLN\\_PlanningCEQA <planningceqa@sandiego.gov>](mailto:planningceqa@sandiego.gov)  
**Cc:** Gloria, Todd <[MayorToddGloria@sandiego.gov](mailto:MayorToddGloria@sandiego.gov)>; CouncilMember Joe LaCava <[JoeLaCava@sandiego.gov](mailto:JoeLaCava@sandiego.gov)>; CouncilMember Kent Lee <[KentLee@sandiego.gov](mailto:KentLee@sandiego.gov)>; M Petrie <[mara12rose@hotmail.com](mailto:mara12rose@hotmail.com)>  
**Subject:** [EXTERNAL] Fw: critical comments DEIR & re-zoning

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**From:** M Petrie <[mara12rose@hotmail.com](mailto:mara12rose@hotmail.com)>  
**Sent:** Sunday, April 21, 2024 2:40 PM  
**To:** [planuniversity@sandiego.gov](mailto:planuniversity@sandiego.gov) <[planuniversity@sandiego.gov](mailto:planuniversity@sandiego.gov)>  
**Cc:** [awiese@sdsu.edu](mailto:awiese@sdsu.edu) <[awiese@sdsu.edu](mailto:awiese@sdsu.edu)>; M Petrie <[mara12rose@hotmail.com](mailto:mara12rose@hotmail.com)>  
**Subject:** critical comments DEIR & re-zoning

This comment concerns the parcel of land called La Jolla Colony shopping center in North UC. We live across the street from the shopping center. We strongly believe that a rezoning of this commercial neighborhood (CN) shopping center to CC-38 would lead to irreparable harm and unfavorable consequences to the neighborhood, and we find the DEIR is clearly deficient in addressing concerns.

I74-1

(1) Rezoning to this level would lead to major traffic, congestion, and parking problems for everyone involved, and this is not addressed. As it is, finding street parking along Regents Road is difficult, particularly during evening hours.

I74-2

(2) The impact of noise is not even addressed in this DEIR, because the document says they do not know what they are, other than to say the noise impacts will be significant (e.g., pp.50-51, section 4.11). So this part of the EIR is clearly deficient. And once the noise impact is finally resolved, what mitigation will be provided for noise attenuation to the surrounding low density residences? Some of the residences surrounding the shopping center were built before Title 24 (e.g., RM-1-1 buildings on the east side of Regents Rd).

I74-3

So, once the city evaluates the noise impact, the city would have to do mitigation on these buildings to ameliorate the enhanced noise due to traffic, bus, and much higher density. This is not even discussed, but it obviously is required to complete the EIR. For example, would mitigation include double pane windows and HVAC systems?

**I74-3 cont.**

(3) Because most of the residences surrounding the shopping center are 2 stories with the lowest multi-family densities, the allowance of 100 foot high buildings in CC-38 is completely out of character with the surrounding residences.

**I74-4**

(4) This area of North UC is supposed to have density decreasing from Nobel south to Rose Canyon. The proposed CC-38 is clearly not compatible with that scenario.

**I74-5**

Marlene & Tom Petrie  
residents of North UC

**I74: Response to Marlene and Tom Petrie Comment Letter**

**I74-1:** This comment is an introduction to the letter. The comment is in regard to the University Community Plan Update (CPU) and does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I74-2:** Transportation impacts discussed in Section 4.14, Transportation, of the Draft PEIR. Since the passage of Senate Bill (SB) 743 in 2018, CEQA Guidelines Section 15064.3 no longer uses auto delay, parking, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Vehicle Miles Traveled (VMT) is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020. With the implementation of this new threshold, parking and traffic congestion concerns are issues that are not required to be studied as a part of the environmental review process. Also, see response to comments O13-1 and O13-2 under comment letter O13.

**I74-3:** The noise-related impacts of the proposed project are discussed in Section 4.11.5.1 of the Draft PEIR. Ambient noise levels, such as those related to construction, the residential-commercial interface, and traffic, are considered to be significant in the PEIR because, at a program level, the assessment takes into consideration the potential environmental impacts of the buildout of the Blueprint SD Initiative, University CPU and Hillcrest Focused Plan Amendment (FPA); however, the specific size and location of future development projects in accordance with these planning frameworks is not known at this time. Construction and ambient noise are regulated by Sections 59.5.0404 and 59.5.0401 et seq. of the San Diego Municipal Code. Future projects would be required to comply with these regulations, and additional mitigation measures would be required for projects that exceed the noise levels identified in this Draft PEIR.

**I74-4:** Aesthetic impacts are discussed in Section 4.1.4, Issues 3 and 4, of the Draft PEIR. As described in the analysis, aesthetic impacts of infill projects in transit priority areas (TPA) shall not be considered significant per Section 21099(d)(1) of the California Public Resources Code. The La Jolla Colony shopping center is in a TPA.

**I74-5:** Comment noted. The comment is in regard to the University CPU and does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I75 - Nina Podhorsky

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:04:20 AM

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**From:** nina ruderman <nruderman2002@yahoo.com>  
**Sent:** Saturday, April 27, 2024 8:19 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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To Whom It May Concern:

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I75-1

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant

I75-2

environmental effect of a project.

I75-2 cont.

2. The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.
3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.
4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the "community-preferred alternative" (Scenario B) in the City's last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn't feasible.
5. Finally, the City's conclusion that the High Density Alternative was the environmentally superior alternative isn't supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City's own conclusion states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Section 8.2.3, underline added.)

I75-3

I75-4

I75-5

I75-6

The City should revise the DPEIR to address these issues.

| 175-6 cont.

Nina Podhorsky

University City

Sent from my iPhone



**I75: Responses to Nina Podhorsky Comment Letter**

**I75-1:** The comment is an introduction to the letter. No response is required.

**I75-2:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I75-3:** See response to comment I11-3 under comment letter I11.

**I75-4:** See response to comment I11-4 under comment letter I11.

**I75-5:** See response to comment I11-5 under comment letter I11.

**I75-6:** See response to comment I11-6 under comment letter I11.

**I75-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I76 - Scott Preece

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 8:41:27 AM

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**From:** Scott Preece <[scottlpreece@gmail.com](mailto:scottlpreece@gmail.com)>  
**Sent:** Friday, April 26, 2024 10:04 AM  
**To:** CouncilMember Kent Lee <[KentLee@sandiego.gov](mailto:KentLee@sandiego.gov)>; Galloway, Tait <[TGalloway@sandiego.gov](mailto:TGalloway@sandiego.gov)>; Tomlins, Coby <[CTomlins@sandiego.gov](mailto:CTomlins@sandiego.gov)>; Lukes, Suchitra <[SLukes@sandiego.gov](mailto:SLukes@sandiego.gov)>; Causman, Nathen <[NCausman@sandiego.gov](mailto:NCausman@sandiego.gov)>; CouncilMember Joe LaCava <[JoelaCava@sandiego.gov](mailto:JoelaCava@sandiego.gov)>; [universitycitypeeps@gmail.com](mailto:universitycitypeeps@gmail.com); [PLN\\_PlanningCEQA](mailto:PLN_PlanningCEQA) <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>; Gloria, Todd <[MayorToddGloria@sandiego.gov](mailto:MayorToddGloria@sandiego.gov)>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I76-1

I76-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I76-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to

I76-4

explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

176-4 cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

176-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

176-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

176-7

176-8

Sincerely,  
Scott Preece  
University City Resident

**I76: Responses to Scott Preece Comment Letter**

**I76-1:** See response to comment O13-1 under comment letter O13.

**I76-2:** See response to comment O13-2 under comment letter O13.

**I76-3:** See response to comment O13-3 under comment letter O13.

**I76-4:** See response to comment O13-4 under comment letter O13.

**I76-5:** See response to comment O13-5 under comment letter O13.

**I76-6:** See response to comment O13-6 under comment letter O13.

**I76-7:** See response to comment O13-7 under comment letter O13.

**I76-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I77 Vladimir Radomirovic

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on the Draft Program Environmental Impact Report (DPEIR)  
**Date:** Tuesday, April 30, 2024 8:42:23 AM

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**From:** Vladimir Radomirovic <[vradomir@yahoo.com](mailto:vradomir@yahoo.com)>  
**Sent:** Friday, April 26, 2024 11:00 AM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** Gloria, Todd <[MayorToddGloria@sandiego.gov](mailto:MayorToddGloria@sandiego.gov)>; CouncilMember Joe LaCava <[JoelaCava@sandiego.gov](mailto:JoelaCava@sandiego.gov)>; CouncilMember Kent Lee <[KentLee@sandiego.gov](mailto:KentLee@sandiego.gov)>  
**Subject:** [EXTERNAL] Comments on the Draft Program Environmental Impact Report (DPEIR)

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Hi

I am the resident of UC community and would like to express full support for the comment of the "Help Save UC" group.

I77-1

The amount and quality of work City of San Diego put into the EIR and Plans, as well as quality of answers provided in meetings with City officials was extremely low. No concerns were addressed and no readiness for compromise shown, completely opposing well researched, patiently explained arguments from the South UC residents. When almost 100% residents are opposing your plans, you should stop and think about it.

I77-2

There are of course other methods of communication with the City of San Diego which I guess we'll be forced to resort to if our inputs are continuously ignored.

I77-3

General thoughts I sent in previous email:

Population of California and the City of San Diego is shrinking year over year. No need for over developing at this point

<https://ktla.com/news/california/new-census-estimates-show-which-california-counties-are-losing-residents/> (just an example, plus many other sources)

I77-4

- Businesses in and around UC are having layoffs (big ones like Illumina, Qualcomm) and reducing staff, cancelling leases in the area.

I77-5

- Plan does not take care of **Affordable Housing**. Having Affordable Housing percentage below 10% is ridiculous and shows real background of the City initiative - **helping Investors, not students or low income residents.**

I77-6

- Reducing Governor Dr to two lanes is an actual crime. We will have to bring in Fire Department into picture, you are planning to block single evacuation rout of the neighborhood. We have a canyon nearby and fire hazard is real (and imminent).

I77-7

- How can you plan to add a lot of residents on Governor Dr while reduce it to two lanes at the same time? It's already congested during school drop-off and pick-up times. I cannot make left turn from Radcliffe dr to Governor dr sometimes for 15 minutes due to Standley Middle of UCHS crowds.

I77-8

- No requests from residents were accepted in new up zoning proposal (Vons and Sprouts malls).

I77-9

Adding formal comments below.

Thanks  
Vladimir Radomirovic

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I77-10

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project.
2. The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.
3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate.
4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density

I77-11

I77-12

I77-13

I77-14

Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the “community-preferred alternative” (Scenario B) in the City’s last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn’t feasible.

I77-14  
cont.

5. Finally, the City’s conclusion that the High Density Alternative was the environmentally superior alternative isn’t supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City’s own conclusion states, “No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project.” (Section 8.2.3, underline added.)

I77-15

The City should revise the DPEIR to address these issues.

I77-16

**I77: Response to Vladimir Radomirovic Comment Letter**

**I77-1:** This comment is an introduction to the comment letter. No response is necessary.

**I77-2:** Comment noted. The comment does not raise a specific issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I77-3:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I77-4:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I77-5:** Comment noted. The comment does not raise a specific issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

**I77-6:** See response to comment O15-18 under comment letter O15 for a discussion of the University's Community Plan Update's compliance with the City's Affordable Housing Regulations (Chapter 14, Article 2, Division 13 of the San Diego Municipal Code).

**I77-7:** See response to comment O13-3 under comment letter O13 for a discussion of emergency access on Governor Drive.

**I77-8:** See response to comment O13-1 under comment letter O13.

**I77-9:** Comment noted.

**I77-10:** The comment is an introduction to the letter. No response is required.

**I77-11:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11-3.

**I77-12:** See response to comment I11-3 under comment letter I11.

**I77-13:** See response to comment I11-4 under comment letter I11.

**I77-14:** See response to comment I11-5 under comment letter I11.

**I77-15:** See response to comment I11-6 under comment letter I11.

**I77-16:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.



## Comment Letter I78 - David Ramirez

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:18:59 AM

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**From:** David Ramirez <dpramirez@sbcglobal.net>  
**Sent:** Monday, April 29, 2024 11:33 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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---

**Subject:** Comments to University Community Plan Update Draft EIR

I am a current resident of University City and have lived here for over 24 years. I have become a part of this community and have supported all groups and schools that make this community a wonderful place to live in. I am concerned that the changes being proposed within the University Community Plan Update Draft EIR will not improve the community but they will make it a much less desirable and safe area to live in.

I78-1

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

**I. No Changes Should Be Made to Governor Drive.** Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up

I78-2

I78-3

their children attending all three schools and when events are held at Standley Park.

178-3  
cont.

**II. Emergency Access to South UC Must Be Maintained.** The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

178-4

**III. School Requirements from the San Diego School District Must Be Met.** The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

178-5

**IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis.** CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and those alternative increase density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

178-6

**V. The City Should Prepare a DEIR Specific to the University CPU.** Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the

178-7

Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

178-7  
cont.

**VI. The DEIR Should Evaluate the Full Spectrum of Environmental**

**Impacts:** The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally, it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

178-8

178-9

Sincerely,

David Ramirez  
4533 Huggins Street  
San Diego, Ca 92122  
(858) 457-1023

**I78: Responses to David Ramirez Comment Letter**

**I78-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report. The comment is noted, and no further response is required.

**I78-2:** See response to comment O13-1 under comment letter O13.

**I78-3:** See response to comment O13-2 under comment letter O13.

**I78-4:** See response to comment O13-3 under comment letter O13.

**I78-5:** See response to comment O13-4 under comment letter O13.

**I78-6:** See response to comment O13-5 under comment letter O13.

**I78-7:** See response to comment O13-6 under comment letter O13.

**I78-8:** See response to comment O13-7 under comment letter O13.

**I78-9:** See response to comment O13-8 under comment letter O13.

## Comment Letter I79 - Deborah Ramirez

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University Community Plan Comments  
**Date:** Tuesday, April 30, 2024 9:12:55 AM

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**From:** Debbie Ramirez <debaram@sbcglobal.net>  
**Sent:** Sunday, April 28, 2024 10:45 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>  
**Subject:** [EXTERNAL] University Community Plan Comments

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To Whom It May Concern:

I am submitting comments on the University Community Plan Update. I support all of the comments submitted by Help Save UC and I especially want to highlight the following:

1. The height limit for any future development at the UC Marketplace (the Sprouts shopping center on Governor Drive) must be 40 feet with a setback of 30 feet from adjacent properties.
2. The height limit for any future development at the University Square (the Vons shopping center on Governor Drive) must be 50 feet with a setback of 30 feet from adjacent properties.
3. The density at the UC Marketplace must be 29 dwelling units/acre and the density at the UC Marketplace must be 54 dwelling units/acre.
4. For the four commercial properties (gas stations) on the corner of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl's Jr. properties located on the south side of Governor Drive, east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and

I79-1

I79-2

I79-3

I79-4

I79-5

offices/retail), these properties must have a maximum density of 29 dwelling units/acre, the current height limits must be retained, and setbacks must be 30 feet from adjacent properties.

179-5 cont.

5. Development on any property designated “Community Village” in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community serving retail, food, beverage, and grocery use.

179-6

Sincerely,

Deborah Ramirez  
4533 Huggins Street  
San Diego, Ca 92122

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments To Revised University Community Plan Update  
**Date:** Tuesday, April 30, 2024 9:18:11 AM

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**From:** Deb <debaram@sbcglobal.net>  
**Sent:** Monday, April 29, 2024 10:48 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>  
**Subject:** [EXTERNAL] Comments To Revised University Community Plan Update

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To Whom It May Concern:

I am a current resident of University City and have lived here for 24 years. I have become a part of this community and have supported all groups and schools that make this community a wonderful place to live in. I am concerned that the changes being proposed within the University Community Plan Update will not improve the community but they will make it a much less desirable and unsafe area to live in.

179-7

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

- The City Should Reduce the Proposed Housing Density By at Least Half.** The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon

179-8

179-9

179-10

emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

I79-10  
cont.

I79-11

I79-12

**II. Governor Drive Should Not Be Reduced to Two Lanes to**

**Accommodate Bike Lanes.** The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

I79-13

I79-14

**III. The Proposed Up-zoning of the South UC Shopping Centers Should**

**be Lowered.** The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

I79-15

**IV. Customer Parking Should be Maintained at South UC Shopping**

**Centers.** The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University

I79-16



CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

179-16 cont.

**V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers.** University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

179-17

**VI. More Solutions are Needed for Larger, Usable Park Space.** The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

179-18

**VII. The City's Argument that People will Give up their Cars is Unfounded.** There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

179-19

179-20

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

179-21

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

179-22

**VII. The University CPU Needs to Address Fire & Safety.** While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent \$30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

179-23

**VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires.** Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

179-24

**IX. Housing Affordability Must Be a High Priority.** Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

179-25

**X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community**

**Enhancements.** A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

179-26

Sincerely,

Deborah Ramirez  
4533 Huggins Street  
San Diego, Ca 92122

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments To Revised University Community Plan Update  
**Date:** Tuesday, April 30, 2024 9:18:23 AM

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**From:** Deb <debaram@sbcglobal.net>  
**Sent:** Monday, April 29, 2024 11:01 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>  
**Subject:** [EXTERNAL] Comments To Revised University Community Plan Update

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## **Subject: Comments to Revised University Community Plan Update**

To Whom It May Concern:

I am a current resident of University City and have lived here for 24 years. I have become a part of this community and have supported all groups and schools that make this community a wonderful place to live in. I am concerned that the changes being proposed within the University Community Plan Update will not improve the community but they will make it a much less desirable and unsafe area to live in.

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

- The City Should Reduce the Proposed Housing Density By at Least Half.** The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than

**179-27**

spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

**II. Governor Drive Should Not Be Reduced to Two Lanes to**

**Accommodate Bike Lanes.** The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

179-27  
cont.

**III. The Proposed Up-zoning of the South UC Shopping Centers Should**

**be Lowered.** The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

#### **IV. Customer Parking Should be Maintained at South UC Shopping**

**Centers.** The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

#### **V. The City Needs to Find Sounder Solutions to Providing Additional**

**Recreation Centers.** University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

#### **VI. More Solutions are Needed for Larger, Usable Park Space.**

The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

#### **VII. The City's Argument that People will Give up their Cars is**

**Unfounded.** There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides,

179-27  
cont.

MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

**VII. The University CPU Needs to Address Fire & Safety.** While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent \$30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

**VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires.** Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

**IX. Housing Affordability Must Be a High Priority.** Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs

179-27  
cont.

to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

**X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community**

**Enhancements.** A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

I79-27 cont.

Sincerely,

Deborah Ramirez  
4533 Huggins Street  
San Diego, Ca 92122



**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:13:08 AM

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**From:** Debbie Ramirez <debaram@sbcglobal.net>  
**Sent:** Sunday, April 28, 2024 10:53 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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

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**Subject:** Comments to University Community Plan Update Draft EIR

To Whom It May Concern:

I am a current resident of University City and have lived here for 24 years. I have become a part of this community and have supported all groups and schools that make this community a wonderful place to live in. I am concerned that the changes being proposed within the University Community Plan Update Draft EIR will not improve the community but they will make it a much less desirable and safe area to live in.

179-28

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

**I. No Changes Should Be Made to Governor Drive.** Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up

179-29

179-30

their children attending all three schools and when events are held at Standley Park.

179-30 cont.

**II. Emergency Access to South UC Must Be Maintained.** The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

179-31

**III. School Requirements from the San Diego School District Must Be Met.** The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

179-32

**IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis.** CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

179-33

**V. The City Should Prepare a DEIR Specific to the University CPU.** Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local

179-34

coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

179-34 cont.

**VI. The DEIR Should Evaluate the Full Spectrum of Environmental**

**Impacts:** The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

179-35

179-36

Sincerely,

Deborah Ramirez  
4533 Huggins Street  
San Diego, Ca 92122

**I79: Response to Deborah Ramirez Comment Letter**

**I79-1:** The comment introduces the comment letter; no response is necessary.

**I79-2:** This comment about the shopping center at Governor Drive and Regents Road has been noted. As this is a comment about the University Community Plan Update (CPU), and not about the adequacy of the Draft Program Environmental Impact Report (PEIR), no response is necessary.

**I79-3:** This comment about the shopping center at Governor Drive and Genesee Avenue has been noted. As this is a comment about the University CPU, and not about the adequacy of the Draft PEIR, no response is necessary.

**I79-4:** This comment about the shopping center at Governor Drive and Regents Road has been noted. As this is a comment about the University CPU, and not about the adequacy of the Draft PEIR, no response is necessary.

**I79-5:** These comments about properties around the intersection of Governor Drive and Regents Road and the intersection of Governor Drive and Genesee Avenue have been noted. As this is a comment about the University CPU, and not about the adequacy of the Draft PEIR, no response is necessary.

**I79-6:** This comment about areas designated as Community Village in the University CPU is noted. As this is a comment about the University CPU, and not about the adequacy of the Draft PEIR, no response is necessary.

**I79-7:** The comment introduces the comment letter; no response is necessary.

**I79-8:** See response to comment I13-2 under comment letter I13.

**I79-9:** See response to comment I13-3 under comment letter I13.

**I79-10:** See response to comment I13-4 under comment letter I13.

**I79-11:** See response to comment I13-5 under comment letter I13.

**I79-12:** Comment noted.

**I79-13:** See response to comments O13-1 and O13-2 under comment letter O13.

**I79-14:** See response to comment I13-8 under comment letter I13.

**I79-15:** See response to comment I13-9 under comment letter I13.

**I79-16:** See response to comment I13-10 under comment letter I13.

**I79-17:** See response to comment I13-11 under comment letter I13.

**I79-18:** See response to comment I13-12 under comment letter I13.

**I79-19:** See response to comment I13-13 under comment letter I13.

**I79-20:** See response to comment I13-14 under comment letter I13.

**I79-21:** See response to comment I13-15 under comment letter I13.

**I79-22:** See response to comment I13-16 under comment letter I13.

**I79-23:** See response to comment I13-17 under comment letter I13.

**I79-24:** See response to comment I13-18 under comment letter I13.

**I79-25:** See response to comment I13-19 under comment letter I13.

**I79-26:** See response to comment I13-20 under comment letter I13.

**I79-27:** These comments are duplicates of comments I79-7 through I79-26.

**I79-28:** The comment introduces the comment letter; no response is necessary.

**I79-29:** See response to comment O13-1 under comment letter O13.

**I79-30:** See response to comment O13-2 under comment letter O13

**I79-31:** See response to comment O13-3 under comment letter O13.

**I79-32:** See response to comment O13-4 under comment letter O13.

**I79-33:** See response to comment O13-5 under comment letter O13.

**I79-34:** See response to comment O13-6 under comment letter O13.

**I79-35:** See response to comment O13-7 under comment letter O13.

**I79-36:** See response to comment O13-8 under comment letter O13.

## Comment Letter I80 - Lu Rehling

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Objection to draft PEIR for proposed Hillcrest FPA  
**Date:** Tuesday, April 30, 2024 9:27:41 AM  
**Attachments:** [CEQAobjectionPEIR\\_HillcrestFPA.pdf](#)

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**From:** Lu Rehling <lurehling@gmail.com>  
**Sent:** Monday, April 29, 2024 7:20 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Objection to draft PEIR for proposed Hillcrest FPA

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

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CEQA Policy & Review:

Please see the attached objection to the draft PEIR for the proposed Hillcrest FPA.

I80-1

Thank you.

-----  
Lu Rehling  
3510 Park Boulevard  
San Diego, CA 92103  
650-208-8678 (cell)  
[LuRehling@gmail.com](mailto:LuRehling@gmail.com)  
-----

CEQA Policy & Review  
City Planning Department  
City of San Diego  
PlanningCEQA@sandiego.gov

29 April 2024

RE: Objection to draft PEIR for proposed Hillcrest FPA

I object to the draft Program Environmental Impact Report ("PEIR") provided by the City Planning Department of the City of San Diego for its Hillcrest Focused Plan Amendment to the Uptown Community Plan ("Hillcrest FPA").

**The project does not, as required under CEQA, have a clear and stable project description.**

The justification for that claim is that the draft PEIR project description is

- Inaccurate**
- Misleading**
- Inconsistent with other public official representations of the project**

180-2

**INACCURATE:** The draft PEIR identifies only "the Hillcrest and the Medical Complex neighborhoods" as subject to redesignation. However, the proposed Hillcrest FPA area also includes part of the University Heights neighborhood, which the draft PEIR inaccurately fails to identify as affected by the redesignation. However, as confirmed by the President of the University Heights Community Association, the southern boundary of that neighborhood is Lincoln Avenue. The City Planning Department is well aware of this neighborhood boundary, because it was at issue in planning for the Normal Street Promenade project that was approved in 2020.

180-3

**IMPACT:** The proposed Hillcrest FPA rezones the area of University Heights that lies north of Lincoln and west of Park Blvd from maximum 109 DU/AC to maximum 218 DU/AC, allowing a potential doubling of allowable building density and, as result, building heights also could be taller.

**AWARENESS:** The proposed Hillcrest FPA project description in the draft PEIR does not alert residents, businesses, property owners, and other stakeholders in the University Heights neighborhood of a major environmental impact of this project on their neighborhood.

180-4

**MISLEADING:** The proposed Hillcrest FPA title, "Hillcrest Focused Plan Amendment to the Uptown Community Plan," is misleading because it suggests that the amendment would apply only to an ill-defined "focus" area, limited to 380 acres. However, in reality, the proposed amendment would affect all of Uptown, which is 2700 acres, per the draft PEIR. In the proposed Hillcrest FPA here are many proposed revisions to all elements of the Uptown Community Plan that are not restricted only to Hillcrest. This is why, after the City Planning Department published its initial discussion draft of the Hillcrest FPA, the CPG for Uptown, Uptown Planners, requested that the title be changed. However, the City Planning Department effectively refused that request by ignoring it and publishing the second draft with the same Hillcrest FPA title.

The misleading Hillcrest FPA title does not reflect that an amendment to the Uptown Community Plan inevitably affects all of the adjoining neighborhoods in the community. The fact is that Uptown consists of six distinct neighborhoods, including, in addition to Hillcrest, not only the Medical Complex and University Heights (not named in the title even though directly impacted by redesignations) but also Bankers Hill, Middletown, and Mission Hills.

180-5

**IMPACT:** All neighborhoods in Uptown would be affected by the major changes in density proposed for the proposed Hillcrest FPA project area, which could turn Uptown into another downtown with dramatic increases in traffic, reduced parking, increased heat zones with radiating effects, reduced tree canopy,



heavier demands upon utilities infrastructure, parks, emergency services, etc. All of those long-term potential impacts are in addition to the relatively short-term but potentially massive environmental costs of demolition and new construction affecting air quality, noise, vehicle access, etc. The proposed Hillcrest FPA project also includes important changes to policies affecting the entire community, such as regarding transit priorities, architectural guidelines for setbacks, promenade widths, recycling collection, etc., all of which have environmental impacts.

180-5  
cont.

In addition, because the neighborhoods of Uptown adjoin one another, changes could affect environmental sustainability for the entire community in other ways. For example, residents of Bankers Hill do not have a major grocery store in their neighborhood, so they mostly grocery shop in Hillcrest, an activity not always easily conducted without a car, especially for those elderly, disabled, or with families. Therefore, increased congestion and searches for parking in Hillcrest would affect Bankers Hill residents' driving habits, which, in turn, would affect air quality. Similarly, residents in Mission Hills and Middletown rely on Washington Avenue as a major artery, but proposed north-south one-way couplets and associated changes on Hillcrest streets, combined with the problematic plan for public transportation and emergency vehicles servicing the Medical Complex neighborhood sharing a single lane in heavy traffic conditions, would increase congestion on that already overburdened artery, with potentially severe negative environmental (as well as health and safety) effects.

180-6

**AWARENESS:** The project title does not alert residents, businesses, property owners, and other stakeholders in the five neighborhoods of Uptown that are not Hillcrest of a major environmental impact of this project in their neighborhoods.

180-7

**INCONSISTENT WITH OTHER PUBLIC OFFICIAL REPRESENTATIONS OF THE PROJECT:** The draft PEIR is not consistent with the statement on the City Planning Department's Plan Hillcrest website that represents the proposed Hillcrest FPA project as one "building on the Uptown Community Plan policy framework," without even mentioning the "increases to the planned residential density and non-residential development capacity" identified in the draft PEIR. Instead, the website's project description identifies the need to "address housing costs," without noting that the proposed means to do so would be to increase density (and to do so without any commitment to affordable housing). The website introduction also elevates the goal of celebrating "unique identity" and honoring a "legacy of place," not noting that the proposed Hillcrest FPA would instead add 17,000 housing units (which could replace unprotected historic buildings and drastically modify neighborhood character) at great environmental expense for demolition and construction. The marketing language that has been used to define the proposed Hillcrest FPA since the project was first introduced to the public in 2019 does not include the words "density" and "zoning" that are essential to the project description in the draft PEIR.

180-8

Similarly, the proposed Hillcrest FPA also does not describe the increases to planned residential density in the introductory "Community Profile" section. In fact, that section is internally inconsistent: The description for Hillcrest as it currently stands adds the words "high density," as if the new high density height limits that the proposed plan includes already were in place, without indicating that the existing plan's definition of high density (and therefore the tallest existing buildings in Hillcrest) are half or less the height than would be allowed under the Hillcrest FPA. However, the description of the Medical Complex states the current reality that it has higher "development intensities" than Hillcrest, including the tallest structures in the community, which would not be true were the Hillcrest FPA approved. Similarly, University Heights is correctly described as predominantly "low rise" residential with just a small number of three-story commercial buildings, with no indication that the Hillcrest FPA's new higher density zoning would allow massively taller mixed-use structures than presently permitted.

180-9

**IMPACT:** The shift in language and emphasis from official representations of the project outside of the draft PEIR to the official language and emphasis in the draft PEIR project description is both confusing and deceptive. Given that the draft PEIR already is inaccurate and misleading in its own language only adds to



the confusion, as does the fact that the draft PEIR incorrectly states that the proposed Hillcrest FPA's planned land uses "follow a similar pattern to the planned uses" of the existing Uptown Community Plan.

I80-9  
cont.

**AWARENESS:** Most residents, owners, businesses, and other community stakeholders introduced to the project by official representations on the proposed Hillcrest FPA website and in the proposed Hillcrest FPA draft itself might not anticipate the major proposed changes to population density, building heights, mobility, etc. and therefore might not recognize how much the proposed Hillcrest FPA would change the existing community plan, with important environmental consequences at stake.

I80-10

**For all of these reasons, the draft PEIR for the Hillcrest FPA does NOT meet CEQA requirements for a clear and stable project description.** Of course, because the Hillcrest FPA violates CEQA, it must be rejected.

I80-11

Thank you for your consideration of my objection,



Lu Rehling  
Hillcrest resident  
Former board member of the Uptown CPG, Uptown Planners  
Former member of the Uptown Planners ad hoc Plan Hillcrest Committee

3510 Park Blvd  
San Diego, CA 92103  
650-208-8678  
LuRehling@gmail.com

**180: Responses to Lu Rehling Comment Letter**

**180-1:** This comment introduces the email attachment.

**180-2:** This comment is an introduction to the letter and the commenter's general concerns. This comment does not address the adequacy of the Program Environmental Impact Report (PEIR). No response is necessary.

**180-3:** This comment about the boundary line of University Heights community has been noted. The Hillcrest FPA boundary is described in Chapter 2.1.1.2 and shown in Figure 2-3 of the PEIR. Further, Figure 2-4 of the PEIR identifies the adopted land uses within the Hillcrest FPA area, which include residential-medium high, residential-high, community commercial, office commercial, and institutional uses.

**180-4:** Consistent with CEQA Statute Section 21091, the Draft PEIR disclosed the significant environmental impacts of the proposed project and was made available to the public on March 14, 2024, for a 45-day public review period. In addition, the City of San Diego has provided multiple opportunities for the public to engage in the planning process for the Hillcrest FPA since April 2020, including a dedicated website ([planhillcrest.org](http://planhillcrest.org)). Chapter 3.4 of the Draft PEIR includes a description of the Hillcrest FPA boundary and a specific reference to Figure 2-3.

**180-5:** The proposed land use and policy changes are implemented in the 380-acre Hillcrest FPA area which is identified in Figure 2-4 of the Draft PEIR. The environmental assessment in the Draft PEIR covers the project area, which would be these 380 acres and not the entire Uptown Community Plan area. As noted by the commenter, development in accordance with the Hillcrest FPA could affect conditions outside the plan boundaries. As discretionary projects within the Hillcrest FPA will be proposed in the future, impacts that might affect the larger community, such as those related to public services, transportation, noise, and air quality, would be assessed on a project-by-project basis. These assessments would take into account adjacent land uses and projected local and regional growth; mitigation for significant impacts not addressed in the PEIR would be provided as appropriate and if necessary. As a comprehensive, long-term plan for physical development, the proposed Hillcrest FPA is designed to manage and address growth in a manner that is consistent with the City's General Plan and Climate Action Plan.

**180-6:** The transportation impacts of the project are discussed in Chapter 4.14 of the Draft PEIR. Since the passage of Senate Bill (SB) 743 in 2018, CEQA Guidelines Section 15064.3 no longer uses auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. Vehicle Miles Traveled (VMT) is the metric by which transportation impacts under CEQA are measured. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric was required as of July 1, 2020. With the implementation of this new threshold, parking and traffic congestion concerns are issues that are not required to be studied as a part of the environmental review process which will address VMT impacts, if any; no further response is necessary.

See Chapter 4.2.4 Issue 3(b) and Cumulative Analysis of the Draft PEIR in regard to the concern about air quality impacts related to traffic (i.e., mobile sources).

**I80-7:** See response to comment I80-3 and I80-4.

**I80-8:** The comment on the comparison of the Draft PEIR's project description to the information on the Plan Hillcrest website has been noted. Specifically, the commenter raises a concern regarding the adequacy of the website's description of the Hillcrest FPA proposed land use changes. The Draft PEIR's purpose is to inform decision-makers and the public of the potential significant environmental impacts of the project. Chapter 3.5.3 of the Draft PEIR provides a detailed description of the proposed increases to the planned residential density and non-residential development capacity within the Hillcrest FPA; including a comparison with the existing Uptown CPU of the proposed changes as shown in Table 3-1 and Table 3-2. Regarding affordable housing, the Hillcrest FPA would provide affordable housing in order to meet the City's regional housing needs allocation for low- and very-low-income housing in compliance with the City's Inclusionary Affordable Housing Regulations (San Diego Municipal Code (SDMC) Chapter 14, Article 2, Division 13).

Regarding the potential impacts to the historic district, the Hillcrest Historic District Supplemental Development Regulations (SDRs) are designed to protect the significant historic character-defining features – namely the storefronts and the 1–3 story pedestrian scale along the streetscape – while allowing for new development within the district (see the discussion in Chapter 4.4.4, Issue 1, of the Draft PEIR). The proposed SDRs provide design regulations for contributing and non-contributing resources as identified in the Hillcrest Historic District nomination and by the Historical Resources Board (HRB) when designated. Specifically, SDR-C.1 provides regulations for contributing resources, which are resources identified in the Hillcrest Historic District nomination and designated as such by the HRB and are properties within the district that contribute to the architectural, historical, and/or cultural/LGBTQ+ significance of the historic district. Regulations apply to contributing resources that require: (1) existing building facades along the street wall(s) to be retained and preserved, (2) exterior materials and features associated with the architectural, historical, and/or cultural/LGBTQ+ significance of a contributing resource to be retained in their current location/appearance or restored to their historic location/appearance based on historical documentation, and (3) additions and new construction to comply with the building height and tower massing regulations in SDR-C.3 and SDR-C.4. In the event that a proposed development project is unable to comply with the SDRs, a Site Development Permit would be required pursuant to SDMC Section 126.0502.

**I80-9:** The comment about the updates to the Uptown Community Plan have been noted. In the Draft PEIR, the existing conditions of the Hillcrest FPA area within the Uptown Community Plan area are described in Chapter 2.1.1.2 (Regional Location), 2.2.2 (Geography and Topography), and 2.4.2 (Existing Land Use). The descriptions of the existing conditions of the Hillcrest FPA area, which can be found in Chapter 4.1.1.2(b) (Structure and Built Form) of the Draft PEIR, do not vary from the description found in the Community Profile section of the Hillcrest FPA.

Figure 2-4 of the Draft PEIR identifies the Hillcrest FPA area adopted land uses, which include residential-medium high, residential-high, community commercial, office commercial, and institutional uses. The proposed land uses and policy framework are in Chapter 3.5.2 of the Draft PEIR; these are based on the proposed changes in the draft Hillcrest FPA. As mentioned in Chapter 3.5.2 of the Draft PEIR, the proposed land uses would “follow a similar pattern to the planned land uses from the 2016 Uptown CPU with increases to the planned residential density and non-residential development capacity.” The statement is not misleading, as the commenter states, as it

clearly explains that the pattern of land uses (i.e., the layout of proposed land uses) would be similar, but the intensities would increase.

**I80-10:** The purpose of CEQA and the Draft PEIR is to inform decision-makers and the public of the environmental impacts of development and planning projects to the public. The Draft PEIR identifies the proposed land uses and policy framework in Chapter 3.5.2 which are based on the proposed changes in the draft Hillcrest FPA. As mentioned in Chapter 3.5.2 of the Draft PEIR, the proposed land uses would “follow a similar pattern to the planned land uses from the 2016 Uptown CPU with increases to the planned residential density and non-residential development capacity.” Consistent with Section 15087 of the CEQA Guidelines, this Draft PEIR has been circulated for public review. The notice of completion of the Draft PEIR was posted on March 14, 2024 for a 45-day public review period.

**I80-11:** Comment noted. See response to comments I80-3, I80-4, and I80-8.

## Comment Letter I81 - Delilah Rivera

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Friday, April 26, 2024 10:51:50 AM

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**From:** Delilah Rivera <felinipepe@gmail.com>  
**Sent:** Friday, April 26, 2024 8:26 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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

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To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I81-1

I81-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I81-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve

I81-4

the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I81-4  
cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I81-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I81-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I81-7

I81-8

Sincerely,

Delilah Rivera  
5313 Bothe Avenue  
San Diego, CA 92122

**I81: Responses to Delilah Rivera Comment Letter**

**I81-1:** See response to comment O13-1 under comment letter O13.

**I81-2:** See response to comment O13-2 under comment letter O13.

**I81-3:** See response to comment O13-3 under comment letter O13.

**I81-4:** See response to comment O13-4 under comment letter O13.

**I81-5:** See response to comment O13-5 under comment letter O13.

**I81-6:** See response to comment O13-6 under comment letter O13.

**I81-7:** See response to comment O13-7 under comment letter O13.

**I81-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I82 - Katie Rodolico

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on the DRAFT blueprint/University/Hillcrest PEIR  
**Date:** Tuesday, April 30, 2024 9:06:34 AM

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**From:** Katie Nelson Rodolico <ktnelson@yahoo.com>  
**Sent:** Sunday, April 28, 2024 10:28 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Burton, Zach <ZBurton@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>  
**Cc:** Louis Rodolico <lourodolico@yahoo.com>  
**Subject:** [EXTERNAL] Comments on the DRAFT blueprint/University/Hillcrest PEIR

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CEQA Department and Elected representatives.

My name is Katie Rodolico. I have served on the University CPU subcommittee, since it's inception, as the representative for the University Community Association. I am a long time UC resident, having lived in the community for over 35 years. I am the University City Community Association (UCCA) recording secretary and UCCA representative to the University CPU subcommittee.. All statements in this comment letter are my own and do not represent UCCA or the University CPUS.

I82-1

Please find my following comments specific to the Draft University Community Plan update.

General: It was unfriendly to combine the Blueprint San Diego, University Community Plan Update, and the Hillcrest Focused plan amendment in the same EIR. Hillcrest and University are completely separate areas with different needs and density goals. Combining these unrelated projects with a citywide project served little purpose except to make it confusing, exceptionally long, and very hard to respond to within the 45 day limit. These projects should have been separately analyzed.

I82-2

General: It was disingenuous for the city to choose the High Density Alternative for the University Plan to analyze as the CEQA alternative. This plan was presented to the community in 2022, and due to response from the community, it was pulled back. From July 2022 to June 2023 the community discussed and worked with two plans in the Discussion draft plan. The proposed project for University and a community preferred project. The community preferred project should have been included in the analysis for CEQA.

I82-3

General: The High Density alternative to the University CPU was not properly analyzed. VMT models were not run according to Leo Alto, Sr. Traffic Engineer (at UCPG meeting in March 2024). The school impact was not looked at. Most of the environmental conclusions were hand-waving statements that either the impacts

I82-4



would be looked at prior to construction, or that the building code would take care of any mitigation. Neither argument acts as analysis. This EIR should be rejected outright for failing to adequately analyze the alternative to the project.	<b>I82-4 cont.</b>
Page S-10, 4.2 Issue 1: Emissions of ozone precursors and VOCs indicate that greenhouse gas is an issue, despite the fact that elsewhere in the document it shows GHG is not an issue. Emissions greater than current land uses.	<b>I82-5</b>
Page S-11, 4.2 Issue 2: Emissions exceeding air quality standards is a big deal. Even after mitigation.	<b>I82-6</b>
Page S-11 4.2 Issue 3: Increasing diesel emissions creating toxic air components, even with mitigation is also a big deal.	<b>I82-7</b>
Page S-11, 4.3: All impacts for biology are significant, even after mitigation. How can the city move forward with the destruction of wetlands, riparian areas, vernal pools, etc.	<b>I82-8</b>
Page S-16, 4.6 Issue 1: The University Plan update calls for significant increases in density in close proximity to the Rose Canyon fault. Identifying the risks after the fact defeats the purpose of an EIR. This should be evaluated before the final draft.	<b>I82-9</b>
Page S-16 4.6 Issue 2: Storm runoff would increase in the University area, causing more erosion. I believe the risk of erosion during heavy storms would be significant.	<b>I82-10</b>
Page S-17 4.7: Issue 1: In section 4.2 (air quality) significant risk for increased emissions and toxic air, including VOC and ozone, yet this section concludes no GHG risk. It can't be both. This plan will INCREASE GHG emissions.	<b>I82-11</b>
Page S-18 4.8 Issue 1: Are diesel emissions considered hazardous. If so, see section 4.2 issue 3 that concludes diesel emissions increase.	<b>I82-12</b>
Page S-19 4.8 Issue 3: The appendix from SDUSD suggests that a school should be placed near La Jolla Village Drive and Genesee. This would be less than .25 miles from Prime industrial land. (We won't mention, here, that there are no plans for the needed elementary school if this plan passes.)	<b>I82-13</b>
Page S-20 issues 2 & 4: Were the gas stations at Genesee and Governor evaluated. They are proposed to be upzoned, but have a history of leaking underground storage tanks. These should be specifically looked at for the final EIR.	<b>I82-14</b>
Page S-20 issue 5: This plan does not evaluate how the lane reductions on Governor Drive would impact emergency response times as well as evacuation routes. This should be looked at, in depth, prior to the final EIR. The mobility report included as an additional document alongside the Draft University Community Plan suggests that Governor Drive lane reductions would result in LOS F for much of Governor drive. This would definitely impact negatively the emergency response times.	<b>I82-15</b>
Page S-21 4.9 Issue 2: This assumes the city will properly maintain the storm water	<b>I82-16</b>

<p>system. Recent events in January 2024 show that neighborhoods can be declared disaster zones because the city fails to maintain the stormwater system and entire neighborhoods flood.</p>	<p>182-16 cont.</p>
<p>Page s-22, 4.10 Issue 2: How can the impacts be less than significant if there are significant impacts identified in the Biology Section, the air quality section, noise section etc.</p>	<p>182-17</p>
<p>Page S-23 4.11, issue 1, C: Traffic will increase, noise will increase yet in other areas of the document it suggests that GHG emissions magically don't increase. How can increased traffic result in lower greenhouse gas emissions?</p>	<p>182-18</p>
<p>Page S-25 4.12, issue 1, University Community Plan Update: change the language to state " Implementation of the University CPU <b>would</b> result in the need for additional fire-rescue, police, school, and library facilities. There is no maybe about this - SDUSD says one more elementary school is needed, libraries are already in need of updates, and increased density in high wildfire areas.</p>	<p>182-19</p>
<p>Page S-26 4.13, Issue 1, University CPU. This plan <b>would</b> result in the need for more parks. Not 'could'. This plan is designed to fail when it comes to recreation.</p>	<p>182-20</p>
<p>Page S-27 4.13, Issue 2, University CPU: Change first sentence to "Implementation of the University CPU <b>would</b> require the construction or expansion of parks..."</p>	<p>182-21</p>
<p>Page S-28 4.14, issue 2: Base assumption is SANDAG buildout which is unlikely. Even with that assumption University CPU VMT is &gt;85%. How in the world can you say GHG will go down under this plan?</p>	<p>182-22</p>
<p>Page S-28, 4.14 Issue 3. University CPU proposed project puts mobility hubs in conflict with bike lanes, sidewalks, etc. Not sure how a city engineer can approve this.</p>	<p>182-23</p>
<p>Page S-28 4.14 Issue 4: The lane reduction on Governor Drive would reduce the egress paths to get to the freeways. This needs more analysis before the final draft. See 4.18 issue 1 - increased wildfire risks. This is a very important issue.</p>	<p>182-24</p>
<p>Page S-33 4.18 Issue 2: The premise is that residents will not own cars and use public transit. How does emergency egress work in a wildfire risk area for those without cars? Do they take a bus or trolley to escape? Change this to significant.</p>	<p>182-25</p>
<p>Page 8-22 Greenhouse Gas Emissions.: How can greenhouse gas emissions go down if VMT for employees in University is &gt;85% Additionally, lane reduction on Governor Drive will result in cars idling, increasing emissions with no miles travelled.</p>	<p>182-26</p>
<p>Page 8-24 Noise: Traffic related noise is a bad impact, but it also suggests increased GHG. (See page 8-22 for contradiction.)</p>	<p>182-27</p>
<p>Page 8-25: Public Services: It is wrong to say the impact of the need for public services is 'the same as the project'. If you are adding density you <b>*WILL*</b> have an</p>	<p>182-28</p>

increase in need for schools, parks, libraries. The impact will be GREATER than the project.

**182-28  
cont.**

Page 8-25: Public Services: It states that the location of public services cannot be determined at this time. This is in conflict with Appendix I-2 that clearly states that a new elementary school will be needed near Genesee and La Jolla Village Drive. (And that's for the project - the need is greater for the high density alternative of the University CPU).

**182-29**

Page 8-25: Recreation. With the increase of density in the HD alternative for the University CPU it is false to state that the impacts would be the same as for the project. Need for parks with the HD alternative would be GREATER than for the project.

**182-30**

Page 8-26: Transportation: The HD alternative for the University CPU includes an increase in density far outside TPA areas in south UC. This combined with the project's proposed lane reduction on Governor Drive would result in significantly higher transportation impacts along the Governor Drive corridor. Increased density and reduced lanes on Governor would also significantly impact emergency first responder times and emergency egress in the case of wildfires, to a greater extent than the project.

**182-31**

Page 8-26: Transportation: Shouldn't the fire marshall be consulted about emergency access prior to upzoning, significantly, areas along the Governor Drive corridor. That should be analyzed under CEQA review, not after the fact. :

**182-32**

Page 8-27: Water Quality: It is ironic that the document suggests that proper practices for construction will result in no risk for storm water issues. The city has a history of NOT maintaining the stormwater system, as seen in the Jan. 2024 flooding in South San Diego resulting in a federal disaster declaration. Increases in density means increase in storm runoff as more area is paved for buildings, driveways, paths, sidewalks, bikelanes, etc. This means more runoff into a storm water system that is not well maintained.

**182-33**

Page 8-27: Utilities. When the Lucera project was built the sewer system could not handle the new housing units and emergency retrofits were done to handle the capacity. The existing sewer system is close to capacity and increased density proposed in the HD alternative of the University CPU will push it past capacity, in volumes greater than the project.

**182-34**

Katie Nelson Rodolico  
5906 Dirac Street  
San Diego 92122

University City Community Association (UCCA) recording secretary  
UCCA representative to the University CPU subcommittee.

All statements in this comment letter are my own and do not represent UCCA or the

Univercity CPUS.

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Draft PEIR comments for Blueprint/University CPU/Hillcrest FPA  
**Date:** Tuesday, April 30, 2024 9:21:08 AM

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**From:** Katie Nelson Rodolico <ktnelson@yahoo.com>  
**Sent:** Monday, April 29, 2024 12:45 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Burton, Zach <ZBurton@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>  
**Subject:** [EXTERNAL] Draft PEIR comments for Blueprint/University CPU/Hillcrest FPA

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## CEQA department

My name is Katie Rodolico. I have been a member of the University CPU subcommittee representing the University City Community Association (UCCA). The following are my views and do not represent UCPG, the University CPUS, nor UCCA.

182-35

The following comments and errata address the appendices and additional documents including the DRAFT PEIR documents;

### Appendix J - VMT

General: No VMT study was done for the HD University CPU alternative. It is hard to consider it as an alternative if VMT models were not run. (Let alone declare it environmentally superior.) Leo Alta, Sr. Traffic Engineer, conceded the VMT models were not run on the HD alternative at the March UCPG meeting.

182-36

General: Can the study be considered valid if it is based on full build out of the SANDAG 2050 plan. In other places the city concedes the 2050 plan is unlikely to be completed.

182-37

Page 4 of Appendix b1 (page 28 of pdf): It is clear, in reading this section, that assumptions caused the modelling to crash. And tweaks were made to avoid the crash. The issue seems to be the disparity between households and dwelling units... the plan refers to du. If the model crashes with assumed good data, so bad data replaces it - the model is not valid.

182-38

Page 2 of Appendix b2 (page 32 of pdf): CEQA documents are supposed to be public. The links to the model runs require a city login to arcgis. I tried a non-city account and was denied access. Today is the last day of comment for the DRAFT PEIR, yet data is not publically available. Does this fail CEQA guidelines?

182-39

Appendix F-4 (page 52 of pdf): Employee VMT remains above 85% and fails.

182-40

Appendix F-6 and F-7 (pages 54-55 of pdf): VMT is failing already without increases in density and will continue to fail.

182-41

Appendix B: University History context:

page 33: The document states that 76 homes were single family. This is erroneous, most of these homes are semi-detached with a common wall at the garage, or side bedrooms. There are only a handful of true single family homes in this development.

182-42

Page 45-46. Document gets the opening dates of Standley Middle School and UCHS wrong. Standley opened in the fall 1976. UCHS opened in Fall 1980.

182-43

Page 50: Prior to the University Community Library opening there was a weekly bookmobile, followed by a storefront librare at Regents and Governor (not Genesee and Governor.)

182-44

General: It should be noted that there was a general theme of Colleges and Universities in the development of this community. This is reflected in early developments such as Pennant Village, Campus Life (the north end of Gullstrand.). Street names were either collegiate (Governor, Regents, etc) or Nobel Prize winners.

182-45

Katie Rodolico

**I82: Response to Katie Rodolico Comment Letter**

**I82-1:** This comment is an introduction to the letter; no response is required.

**I82-2:** See response to comment O13-6 under comment letter O13.

**I82-3:** See response to comment I11-6 under comment letter I11 and response to comment O13-5 under comment letter O13.

**I82-4:** As described in Section 15126.6(a) of the California Environmental Quality Act (CEQA) Guidelines, “there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” The objective of the alternatives section is to provide public agencies with a range of feasible alternatives so that they may differentiate the significance levels of the proposed project with those of the alternative projects. The analysis should include a comparison of the alternative’s potential impacts with those of the proposed project, but the analysis does not need to include an assessment at the same level of detail as that of the proposed project [CEQA Guidelines 15126.6(d)]. Chapter 8 of the Draft Program Environmental Impact Report (PEIR) uses a qualitative review to assess the differences between the project alternatives and determine which would reduce environmental impacts. In regard to comparing vehicle miles traveled (VMT), CEQA relies on VMT to determine transportation impacts. As described in Section 8.2.2(n) of the Draft PEIR, the High Density Alternative would maximize the opportunity for housing and jobs near and within areas with existing and future transit stations and transit stops identified in the San Diego Association of Government’s (SANDAG’s) Regional Plan. As such, VMT would decrease in the long run and the High Density Alternative would feasibly reduce VMT more than the proposed project would. The potential impacts to public services, including schools, associated with the High Density Alternative is discussed in Section 8.2.2(l).

**I82-5:** Issue 1 of the air quality analysis in Section 4.2.4 of the Draft PEIR describes whether or not the project would conflict with the San Diego Regional Air Quality Strategy (RAQS) and the California State Implementation Plan (SIP), the two air quality plans for the San Diego Air Basin. The threshold for significance for this issue is whether the proposed land uses would conflict with the established plans (i.e., have the proposed changes to land use designations and densities been assumed in the air quality plans). The threshold of significance of this issue is not triggered by the presence of pollutants themselves. Issue 2 in Section 4.2.4 of the Draft PEIR addresses this concern. Both Issue 1 and 2 were found to be significant. .

**I82-6:** Issue 2 in Section 4.2.4 of the Draft PEIR, relating to the increase of criteria pollutants, was found to be significant. This comment has been noted.

**I82-7:** Issue 3 in Section 4.2.4 of the Draft PEIR, relating to the exposure of sensitive receptors to substantial pollutant concentrations, was found to be significant .. This comment has been noted.

**I82-8:** Biological impacts related to sensitive species, sensitive habitats, and wetlands would be significant (see Section 4.3.7 of the Draft PEIR). Impacts related to wildlife corridors and nursery sites and conservation planning would be less than significant. This comment has been noted.

**182-9:** As described in Section 4.6.4, Issue 1, future development in fault buffer zones would be required to prepare a site-specific geotechnical investigation that addresses surface fault-rupture hazards consistent with the San Diego Municipal Code (SDMC) Section 145.1803(a)(2). More specifically, Appendix E of the City's Guidelines for Geotechnical Reports indicates that fault studies would be needed for all new development and projects where repurposing existing occupancy and use would occur. Those studies would need to be prepared in accordance with the Alquist-Priolo Earthquake Zoning Act, California Geological Survey Note 49, which requires trenching or borings to evaluate site conditions. The California Building Code requirements state that new buildings cannot be above active faults and setbacks (typically 50 feet) must be provided. These requirements would be implemented during the ministerial level building permit review associated with future development.

**182-10:** As discussed in Section 4.9.4, impacts related to flooding were found to be less than significant. Future projects would be required to comply with the City's drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual, Environmentally Sensitive Land Regulations protecting floodplains, FEMA standards, City's Stormwater Standards Manual, and requirements of the City's MS4 Permit which would ensure development is designed to avoid erosion and siltation resulting from surface runoff, stormwater drainage systems, and flood flows.

**182-11:** As discussed under Issue 1 of Section 4.7.4, quantification of greenhouse gas (GHG) emissions is not required for the project based on the City's CEQA Significance Determination Thresholds (2022). For plan- and policy-level environmental documents, the City Planning Department's guidance document requires environmental documents to address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and Climate Action Plan (CAP). Pursuant to CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan. The City's CAP is a qualified GHG reduction plan based on CEQA Guidelines Section 15183.5(b)(1)(A) through (F).

As detailed in Issue 2 of Section 4.7.4, implementation of the project would be consistent with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions. Therefore, impacts related to GHG emissions under this threshold would be less than significant. The claim that GHG emissions would increase from implementation of the project is not being disputed, but the EIR notes that under the City's required significance thresholds for analysis, the project would support the City in obtaining Citywide GHG emissions reduction targets under the CAP.

Section 4.2.5 of the Draft PEIR does note that implementation of the project would result in emissions of ozone precursors (VOC and NOx) that would be greater than what is accounted for in the RAQs, leading to significant impacts. However, the analysis of GHG emissions focuses on the main GHG contributors, as described in the City's CAP, including carbon dioxide, methane, nitrous oxide, and fluorinated gases.

**182-12:** Diesel-exhaust particulate matter (DPM) emissions are considered in the air quality analysis (see Section 4.2.4 Issue 3 Sensitive Receptors of the Draft PEIR) under the analysis of Toxic Air



Emissions as they are a result of diesel equipment. The significance threshold under Issue 1 Hazardous Materials primarily focuses on the routine use, transport or disposal of common hazardous materials, including but not limited to fuels, lubricants, solvents, etc., which would require proper storage, handling, use, and disposal. Therefore, it is not included in the analysis under Issue 1 Hazardous Materials of Section 4.8.4.

**182-13:** See response to comment O13-4 under comment letter O13.

**182-14:** As noted in Section 4.8.4, Issues 2 and 4, although over 9,800 database records were screened and 48 properties were evaluated, the possibility of undocumented releases within the University CPU area exists. There are no known hazardous materials conditions that would preclude the proposed development anticipated in the CPU area. However, some properties may need to be individually evaluated at the time of redevelopment and may need remedial measures to mitigate potential exposure to hazardous materials present at those properties in compliance with all applicable regulations and industry and code standards related to health hazards from hazardous materials.

**182-15:** See response to comments O13-2 and O13-3 under comment letter O13.

**182-16:** As noted in Section 4.9.4 Issue 2(c), future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest Focused Plan Amendment (FPA), and the University CPU would have the potential to exceed the capacity of existing or planned stormwater drainage facilities. It is acknowledged that if drainage facilities are not adequately designed, built, or properly maintained, the capacity of the existing facilities can be exceeded, resulting in flooding and increased sources of polluted runoff.

The City's Stormwater Department is responsible for actively maintaining and repairing the City's stormwater infrastructure to ensure adequate stormwater conveyance. However, future development would be required to implement requirements for onsite LID BMPs, such as stormwater detention/retention BMPs set forth in the City's Stormwater Standards Manual, and required per the City's MS4 Permit, to minimize impervious areas and, as a result, simultaneously reduce project runoff and the potential transport of pollutants to the City's stormwater drainage systems. Further, as part of the City's Municipal Waterways Maintenance Program (MWMP), stormwater infrastructure maintenance needs are identified through an annual inspection and prioritization process that includes public input and a hydrologic and hydraulic analysis to determine the existing conveyance capacity of the City's stormwater conveyance system. The results of this inspection and prioritization process is shared annually with the Environment Committee of the City Council, as an additional forum to receive public input, and published by the City as a tool to budget, and plan final engineering and environmental compliance, including identification of compensatory wetlands mitigation.

**182-17:** Section 4.10.4 Issue 2 assesses whether the project would cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The analysis under Issue 2 assesses conflicts with these land use plans, policies or regulations and, as detailed in Section 4.10.4, notes that any conflicts would be minimized accordingly through implementation of General Plan Element policies and project-level specific avoidance and mitigation measures. Implementation of Blueprint SD

Initiative, the University CPU, and the Hillcrest FPA would be consistent with the City's overarching policy and regulatory documents including the General Plan and SDMC. Additionally, updates to mobility policies would help achieve consistency with the Regional Plan. The Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would be consistent with applicable environmental goals, objectives, or guidelines of the SANDAG Regional Plan, the General Plan and General Plan Noise Element, Environmentally Sensitive Lands Regulations, California Coastal Act, the MSCP SAP, the VPHCP, CAP, HRR, ALUCPs, and affordable housing regulations.

**I82-18:** As noted in Chapter 4.11.4 of the PEIR, traffic noise levels under the Blueprint SD Initiative, Hillcrest FPA, and University CPU are expected to contribute to additional traffic noise levels in excess of compatible noise levels for specified land uses defined in the City's land use – noise compatibility guidelines. While at a program level of review impacts are considered significant, the project is intended to support a shift from vehicle traffic toward transit, pedestrian, and bicycle. City implementation of the policy framework of the Climate Action plan, the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would support nonvehicular modes, which would support reductions in traffic noise over time. As noted in Chapter 4.14.5.2 of the PEIR, Vehicle Miles Traveled, the University CPU exceeds the VMT thresholds due to base year VMT being above 85 percent of the regional means for both VMT per Capita (Residents) and VMT per Employee (Employment), resulting in a significant VMT impact under the University CPU. Overall, due to the fact that the timing for the completion of all the SANDAG Regional Plan transportation investments cannot be ensured and future project-specific review is required for consistency with the City's Transportation Study Manual, at a program level of review, residential and employment VMT impacts would be significant. As noted in Chapter 4.7.4 of the PEIR, future development throughout the City would be focused in Climate Smart Village Areas, as demonstrated in both the University CPU and Hillcrest FPA, where there is the greatest propensity for non-automotive travel, supporting citywide reductions in VMT. Although VMT would increase from implementation of the project, and result in near-term GHG emissions increases, the project would support the City in obtaining citywide GHG emissions reduction targets under the CAP. The significance of greenhouse gas emissions impacts would thus be less than significant under the significance threshold for Issue 1 of Chapter 4.7.4 (see also response to Comment I82-11). **I82-19:** See response to comment I13-5 under comment letter I13.

**I82-20:** See response to comment I8-8 under comment letter I8.

**I82-21:** See response to comment I8-8 under comment letter I8.

**I82-22:** See response to comment I82-18.

**I82-23:** The mobility hubs proposed within the University CPU area would be designed at the time of proposal and would be designed to avoid, reduce, or mitigate for impacts to existing bike lanes, sidewalks, and roadways. Detailed design would be required to ensure these impacts are avoided. The University CPU does not specifically address site specific impacts associated with the mobility hubs.

**I82-24:** See response to comment O13-3 under comment letter O13.

**I82-25:** See response to comment O13-3 under comment letter O13.

Further, as described in General Plan's Public Facilities, Services, and Safety Element, the San Diego Police Department coordinates the California Department of Transportation, the California Highway Patrol, the San Diego County Sheriff's Department, and other supporting agencies and jurisdictions to identify transportation and evacuation points for the relocation of people to safe areas during major disasters that would require emergency evacuation. Per Policy PF-P.3, the City also develops and maintains current, integrated, and comprehensive Emergency Operations and Disaster Plans on an annual basis, including a comprehensive multi-modal evacuation plan.

**I82-26:** See response to comment I82-18 and response to comment O13-1 under comment letter O13.

**I82-27:** Noise does not correlate with VMT generation. Please see response to I82-18 for an explanation of GHG emissions and the approach to determining a significance determination in the EIR under the City's CEQA Significance Determination Thresholds.

**I82-28:** See response to comment I13-3 and I13-5 under comment letter I13.

**I82-29:** See response to comment O13-4 under comment letter O13.

**I82-30:** As noted in Section 4.13.3, the City's CEQA Significance Determination Thresholds (2022) for this topic area considers the physical deterioration of existing facilities and the assessment of physical impacts associated with the development of new park and recreation facilities. The City's thresholds do not require the assessment of the extent of the need for these services, although it is anticipated that the need for these facilities would increase with development. At the time future facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of parks. However, as the location and need for potential future recreational facilities cannot be determined at this time, it is unknown what specific impacts may occur. This is consistent with the assumptions of the project assessment under these thresholds. Thus, both the project and the High Density Alternative were determined to have significant impact related to recreation.

**I82-31:** The comment asserts that the High Density Alternative combined with the lane reduction on Governor Drive would result in higher transportation impacts. However, this statement is not supported by evidence considering traffic congestion (e.g. level of service) is no longer the metric used to evaluate the significance of impacts. Higher density and reduced vehicle lanes are generally supportive of a shift to transit and non-vehicular travel, which would reduce potential VMT impacts. See response to Comment O13-1 and O13-3 under comment letter O13 regarding potential impacts related to emergency egress. Although the High Density Alternative would increase density, the same emergency response procedures described in responses to Comments O13-1 and O13-3 would be employed. The High-Density Alternative concluded that impacts related to emergency evacuation and response plans would be less than significant, similar to the project.

**I82-32:** The City of San Diego City Planning Department coordinates with Fire-Rescue Department during the development of all planning documents, including the University CPU. As discussed in Chapter 4.18.2.3, the SDFD regularly (on a five-year basis) conducts surveys to identify constrained areas, or areas where residential development of more than 30 units do not have at least two

emergency evacuation routes. These surveys are used by the City to assess and plan for improvements that may be needed to improve fire response. Application of the City's existing fire code would prohibit any future development from exacerbating any existing constraint related to development on a dead-end road as specified in SDMC Section 511.8201(f)(5)(2). Per Section 8.2.2(n), future development allowed under this alternative would be required to comply with all applicable City codes and policies related to emergency access and would be reviewed by the City Fire Marshal to ensure adequate emergency access.

**182-33:** See response to 182-16.

**182-34:** As noted in Section 8.2.2(p), wastewater impacts under the High Density Alternative would be significant, similar to the project. As noted in Chapter 4.16.4 Issue 3, future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would have the potential to result in an increase in demand for wastewater capacity. Increased demand would also occur under the High-Density Alternative. Like the project, the increased demand may result in a need to increase the sizing of existing pipelines and mains for wastewater and require upgrades. These upgrades are administered by the City's E&CP Department and are handled on a project-by-project basis. The City's PUD infrastructure planning includes long range infrastructure planning and upgrades in anticipation of future growth. Due to the project identifying appropriate locations for growth in response to SANDAG growth projections, existing and ongoing PUD planning would capture the anticipated wastewater demand from the project. While wastewater treatment capacity is likely to be addressed by PUD long range planning and infrastructure improvements, future project level evaluation of wastewater capacity would be required as future development is proposed.

**182-35:** This comment is an introduction to the letter; no response is required.

**182-36:** As addressed in Section 8.2.2(n) of the PEIR, implementation of the High Density alternative is anticipated to result in residential development in greater VMT efficient areas (<85 percent of the regional average). The Final PEIR has been revised to include additional discussion as to why the increased densities under the High Density alternative could support higher transit ridership in the long run and decrease citywide VMT per capita compared to the project as this alternative would maximize the opportunity for housing and jobs near existing and future transit stations and stops identified in the SANDAG Regional Plan to support reductions in VMT per capita. The alternative analysis does not require the same level of analysis as that of the project (CEQA Guidelines Section 15126.6.d); therefore, a separate VMT analysis was not prepared each alternative. The EIR includes sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project and includes a matrix (Table 8-1) displaying the major characteristics and significant environmental effects of each alternative.

**182-37:** The study is based on an assumption that the SANDAG 2050 plan would be fully implemented as that is the applicable Regional Plan currently in place. Since full implementation of the SANDAG Regional Plan's transportation investments cannot be ensured, the transportation analysis concludes impacts would be significant. Nonetheless, the VMT Analysis (Appendix J) is valid. As discussed in Appendix J, VMT data was modeled using the SANDAG ABM 2+, Series 14 Regional Model and assumed the Regional Plan's 2023 Amendment transportation network for 2050.

**182-38:** Appendix B-1 within Appendix J includes detailed methodology of how the model inputs were developed. The section referenced by the commenter explains how the proposed dwelling units (DUs) from Blueprint are converted to model inputs usable in SANDAG's client land-use form template. The memo notes that 'form' uses the term 'dwelling units' but for the model it actually reflects households. Typically, dwelling unit is defined as a housing structure (either single family home, multi-family unit or mobile home) while household is an occupied dwelling unit. Therefore, in the model, households can't exceed the number of dwelling units however the land use override procedure replaces households. The section goes into detail on how that model input requirement was addressed while maintaining the proposed number of dwelling units as accurately as possible.

**182-39:** In accordance with CEQA Guidelines Section 15147, the technical data which served as the basis for the VMT analysis in the Draft PEIR was included in Appendix J to the Draft PEIR. The appendix was available for public examination during the 45-day review period and was submitted to the State Clearinghouse to assist in the public review (CEQA Guidelines Section 15147). Appendix B-2 of Appendix J included links to maps that the technical consultant (WSP) provided the City to facilitate review of the model runs. The maps have been added to the appendix.

**182-40:** As discussed in Appendix F-4, page 52 of Appendix J, the purple dashed line indicates the 85<sup>th</sup> percentile of regional per resident/per worker VMT. Table 4-2 on page 12 of Appendix J, presents the Blueprint SD Initiative 2050 employee VMT for the City of San Diego. Under the Blueprint SD Initiative, the City is projected to have VMT per Employee between 13.2 - 14.2, which is 69 - 74 percent, respectively, of the 2016 Base Year regional means. As such, VMT associated with employment land uses would not exceed the 85 percent threshold and would be less than significant assuming full implementation of the Blueprint SD Initiative and the SANDAG 2021 Regional Plan. However, as addressed in Appendix J, at a programmatic level of analysis, full implementation of the Regional Plan's transportation investments cannot be ensured. Therefore, employment VMT impacts were considered significant in the PEIR.

**182-41:** This comment does not raise an issue related to the adequacy of analysis of the Draft PEIR. A key goal of the project is to focus development in areas that will support a mode shift away from single occupancy vehicle modes to other less VMT intensive modes such as walking, bicycling and transit. The project would support the City in achieving CAP goals, specifically mode share goals, by supporting and incentivizing future development within high village propensity areas with a propensity for walking/rolling, bicycling and transit use, supporting citywide VMT efficiency.

**182-42:** This comment doesn't relate to the adequacy of the analysis in the Draft PEIR; however, the following clarifying response is provided. The University Community Plan Historic Context Statement (Appendix B of the PEIR), states that UC Peñasquitos Inc.'s Pennant Village originally contained 76 single-family homes and 32 multi-family units. This statement is part of background details for residential development from 1960-1971 in the University Community and does not reflect existing conditions or affect the adequacy of the analysis.

**182-43:** This comment doesn't relate to the adequacy of the analysis in the Draft PEIR. While no further response is necessary one is provided. Regarding University City High School, page 45 of Appendix B states, "a groundbreaking ceremony occurred on February 3, 1980, and by the end of the year University City had its first high school." Regarding Standley Middle School, page 46 of

Appendix B states, “the middle school’s construction underwent a series of delays until its construction in 1976.”

**182-44:** Comment noted. This comment does not raise an issue related to the adequacy of analysis of the Draft PEIR.

**182-45:** Comment noted. This comment does not raise an issue related to the adequacy of analysis of the Draft PEIR.

# Comment Letter I83 - Louis Rodolico

From: Ash Reynolds, Tara on behalf of PLN\_PlanningCEQA  
 To: Lombroso, Al  
 Subject: FW: [EXTERNAL] SCH No. 2021070359, Comments, Louis Rodolico  
 Date: Tuesday, April 30, 2024 9:20:15 AM  
 Attachments: DEIR Rodolico SCH No. 2021070359 2024-04-29.pdf

From: Louis Rodolico <lourodolico@yahoo.com>  
 Sent: Monday, April 29, 2024 12:00 PM  
 To: PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
 Subject: [EXTERNAL] SCH No. 2021070359, Comments, Louis Rodolico

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

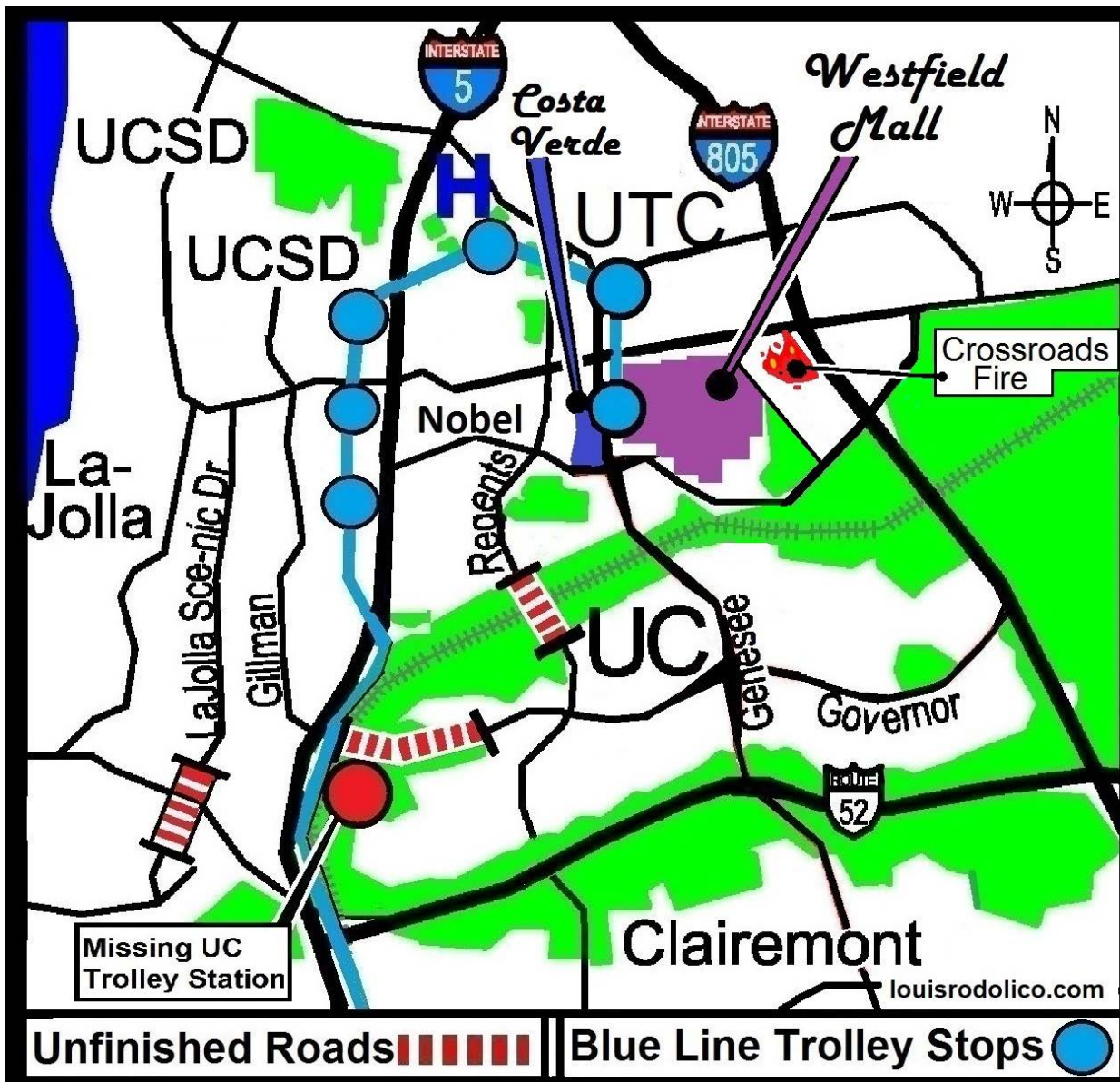
## DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SCH No. 2021070359

BLUEPRINT SD INITIATIVE, HILLCREST FOCUSED PLAN AMENDMENT TO THE UPTOWN COMMUNITY PLAN, AND UNIVERSITY COMMUNITY PLAN AND LOCAL COASTAL PROGRAM UPDATE

Comments: Louis Rodolico April 29, 2024

8.1 Project Alternative Page 8-4 PDF Page 767

The 8.1 project alternative is the same one planning has been pushing for some time. Map PDF page 780. It makes sense to have higher density along main roads like Governor Drive, but only if those roads have been completed and can serve ambulances and conflagration egress. See map of South UC's unfinished roads:



I83-1

Note: only one of the three originally planned roads have been completed. Knowing the overwhelming majority of the community wanted the Regents Road Bridge the Lightner Administration, in service of its clients (not us) did not want to put it on the ballot, which would have been the democratic thing to do. We wonder why democracy is in trouble it is because: shareholders, lobbyists and other special interests are successful in pushing democracy to the side.

In the bridge case a major special interest was Westfield Mall Shareholders who lost their bid in the 1960's to have their mall where 52 and Marian Bear Park are currently located. This would have been a direct pipeline to wealthy La Jolla. Still burning about it, decades later, Westfield paid a half million dollars to get control of the traffic study to remove the Regents Road

I83-2

I83-3

Bridge. [http://www.louisrodolico.com/uploads/7/5/2/2/75221087/djf\\_exhibits.pdf](http://www.louisrodolico.com/uploads/7/5/2/2/75221087/djf_exhibits.pdf)

The more cars Westfield could funnel up Genesee the higher the mall rents. Westfield Operatives conveniently left ambulance service times out of the Bridge EIR. Following that tradition this Draft EIR only mentions Ambulances once with no mention of service times. Open Space is mentioned 99 times, which is completely out of balance. Also planning continues to falsely describe undeveloped land as Open Space. In University this is a de-facto cry for an arsonist/hero to come forward for projects on undeveloped land.

The "E" in CEQA stands for both the natural and human environments but planning has consistently ignored human needs in favor of special interests, like the "At Large" Crossroads Arsonists and their supporters. The City is justifiably afraid of the Crossroads Arsonists. The Friends of Rose Canyon uses the Crossroads Arsonists as a cudgel to threaten the community. This is why we need things on a private government ballot so citizens cannot be intimidated by criminals. The same can be said for the ill-informed and un-studied demand that Governor Drive be reduced to two lanes. Planning should not allow itself to be intimidated, please put it on the ballot.

Allowing democracy to play its part in our city, in the past, would have given planning a complete road system in South UC and a much better argument for the higher density as outlined in 8.1.

Respectfully Submitted

Louis Rodolico

**I83-3**  
**I cont.**  
**I I83-4**  
**I I83-5**  
**I I83-6**  
**I I83-7**



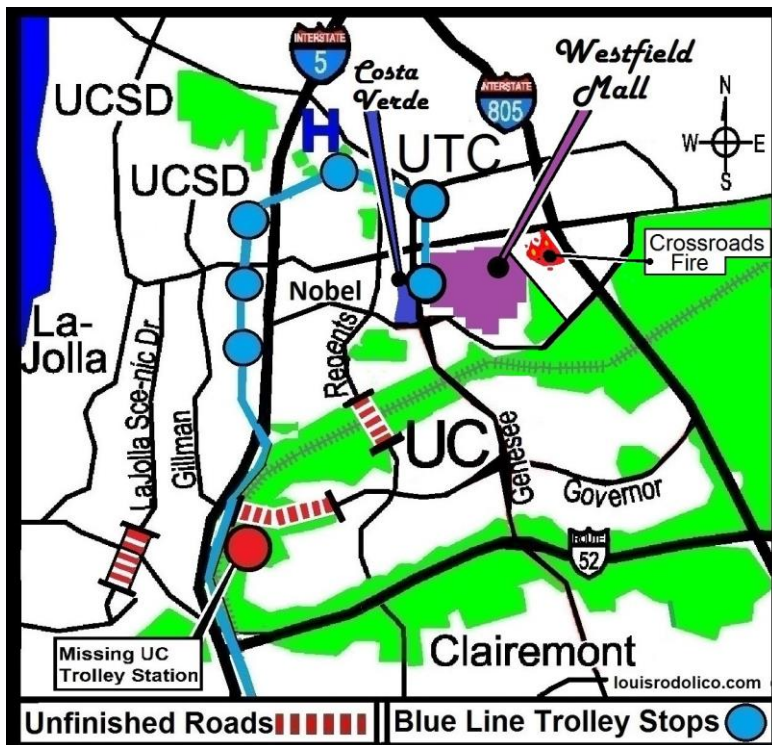
# DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SCH No. 2021070359

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Comments: Louis Rodolico April 29, 2024

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Note: only one of the three originally planned roads have been completed. Knowing the overwhelming majority of the community wanted the Regents Road Bridge the Lightner Administration, in service of its clients (not us) did not want to put it on the ballot, which would have been the democratic thing to do. We wonder why democracy is in trouble it is because: shareholders, lobbyists and other special interests are successful in pushing democracy to the side.

In the bridge case a major special interest was Westfield Mall Shareholders who lost their bid in the 1960's to have their mall where 52 and Marian Bear Park are currently located. This would have been a direct pipeline to wealthy La Jolla. Still burning about it, decades later, Westfield paid a half million dollars to get control of the traffic study to remove the Regents Road Bridge.

[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)

The more cars Westfield could funnel up Genesee the higher the mall rents. Westfield Operatives conveniently left ambulance service times out of the Bridge EIR. Following that tradition this Draft EIR only mentions Ambulances once with no mention of service times. Open Space is mentioned 99 times, which is completely out of balance. Also planning continues to falsely describe undeveloped land as Open Space. In University this is a de-facto cry for an arsonist/hero to come forward for projects on undeveloped land.

The "E" in CEQA stands for both the natural and human environments but planning has consistently ignored human needs in favor of special interests, like the "At Large" Crossroads Arsonists and their supporters. The City is justifiably afraid of the Crossroads Arsonists. The Friends of Rose Canyon uses the Crossroads Arsonists as a cudgel to threaten the community. This is why we need things on a private government ballot so citizens cannot be intimidated by criminals. The same can be said for the ill-informed and un-studied demand that Governor Drive be reduced to two lanes. Planning should not allow itself to be intimidated, please put it on the ballot.

Allowing democracy to play its part in our city, in the past, would have given planning a complete road system in South UC and a much better argument for the higher density as outlined in 8.1.

Respectfully Submitted  
Louis Rodolico

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**I83: Response to Louis Rodolico Comment Letter**

**I83-1:** Comment noted. The roadway expansions highlighted in the commenter's map are not parts of the proposed project. Emergency access is discussed in Section 4.14.4, Issue 4, of the Draft Program Environmental Impact Report (PEIR). Per the analysis, the adequacy of emergency access routes is maintained through project-specific consistency assessments with City of San Diego Fire Prevention Bureau (FPB) Policies A-14-1 (Fire Access Roadways), A-14-9 (Access Roadways: Modified Roadway Surface), and A-14-10 (Fire Apparatus Access Road for Existing Public Streets). Additionally, per FPB Policy A-14-1, the City Fire Marshal must review future development plans.

**I83-2:** Comment noted. The Regents Road Bridge is not a part of the proposed project. The comment does not address the adequacy of the analysis in the Draft PEIR. No further response is required.

**I83-3:** Comment noted. The Regents Road Bridge is not a part of the proposed project. The comment does not address the adequacy of the analysis in the Draft PEIR. No further response is required.

**I83-4:** Response times for police and fire services are measured and analyzed in Section 4.12 of the Draft PEIR. See Tables 4.12-4 for the San Diego Fire Department's performance indicators for 2021. Table 4.12-6 includes the San Diego Police Department's performance indicators for 2022. As determined in Section 4.12.4 Issue 1(a) and (b), future development in accordance with the land use framework of the proposed project, including the University Community Plan Update (CPU), would result in an increase in building square footage and population, which would create a greater demand for police and fire emergency services. As the location and need for potential future facilities cannot be determined at this time, the nature and extent of these impacts is unknown, and impacts related to police and fire services are significant.

**I83-5:** The various types of open space-designated land areas described in Section 3.5.3.1(e) of the Draft PEIR. In the University CPU area, the open space areas are either parks, designated open space, or dedicated open space, as shown on Figure 3-27 of the Draft PEIR, much of which is part of the Multi-Habitat Planning Area, as shown on Figure 3-28 of the Draft PEIR. Lands are designated as open space to help the City reach its goals listed in the Open Space and Conservation chapter of the General Plan [see Section 3.5.3.1(e)].

**I83-6:** As the commenter suggests, the purpose of CEQA is to assess a proposed project's impact on the existing environment, which includes both natural and urban areas. The Draft PEIR assesses the potential impacts of the Blueprint SD Initiative, University CPU, and Hillcrest Focused Plan Amendment on the existing environment. The comment about Governor Drive is noted. The proposed traffic calming and bicycle facility improvements on Governor Drive would implement the City's Mobility Element, Bicycle Master Plan and Climate Action Plan policies that support enhancements to non-vehicular modes, such as bicycles. Changes to the existing roadway design on Governor Drive are intended to calm traffic in order to make the roadway more usable for all modes including bicycles and pedestrians.

**I83-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I84 - Devora Rossi

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEOA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:19:06 AM

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**From:** Devora Rossi <devrossi@yahoo.com>  
**Sent:** Monday, April 29, 2024 11:58 AM  
**To:** PLN\_PlanningCEOA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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

To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

**I. No Changes Should Be Made to Governor Drive.** Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I84-1

I84-2

**II. Emergency Access to South UC Must Be Maintained.** The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I84-3

**III. School Requirements from the San Diego School District Must Be Met.** The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update

I84-4

should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

184-4 Cont.

**IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis.** CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

184-5

**V. The City Should Prepare a DEIR Specific to the University CPU.** Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

184-6

**VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts:** The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

184-7

184-8

Sincerely,

Devora Rossi, University City resident (92122)

**I84: Responses to Devora Rossi Comment Letter**

**I84-1:** See response to comment O13-1 under comment letter O13.

**I84-2:** See response to comment O13-2 under comment letter O13.

**I84-3:** See response to comment O13-3 under comment letter O13.

**I84-4:** See response to comment O13-4 under comment letter O13.

**I84-5:** See response to comment O13-5 under comment letter O13.

**I84-6:** See response to comment O13-6 under comment letter O13.

**I84-7:** See response to comment O13-7 under comment letter O13.

**I84-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I85 - Victoria Aza-Rossi

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:23:09 AM

---

**From:** Victoria Aza-Rossi <victoriazarossi@yahoo.com>  
**Sent:** Monday, April 29, 2024 2:44 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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

To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

- I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. I85-1
- II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant. I85-2
- III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not. I85-3
- I85-4

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

185-5

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185-6

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185-7

185-8

Sincerely,  
Victoria Aza-Rossi/92122



**I85: Responses to Victoria Aza-Rossi Comment Letter**

**I85-1:** See response to comment O13-1 under comment letter O13.

**I85-2:** See response to comment O13-2 under comment letter O13.

**I85-3:** See response to comment O13-3 under comment letter O13.

**I85-4:** See response to comment O13-4 under comment letter O13.

**I85-5:** See response to comment O13-5 under comment letter O13.

**I85-6:** See response to comment O13-6 under comment letter O13.

**I85-7:** See response to comment O13-7 under comment letter O13.

**I85-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I86 - Keala Rusher

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Plan Hillcrest Public Engagement  
**Date:** Tuesday, April 30, 2024 9:31:27 AM

---

**From:** Keala Rusher <kealarusher@gmail.com>  
**Sent:** Monday, April 29, 2024 11:04 PM  
**To:** PLN Hillcrest Focused Amendment <planhillcrest@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@sandiego.gov>; Darsey, Ryan <RDarsey@sandiego.gov>; Latchford, Jordan <JLatchford@sandiego.gov>  
**Subject:** [EXTERNAL] Plan Hillcrest Public Engagement

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Hello, my name is Keala, and I am a concerned resident of Hillcrest.

I86-1

I would like to request a revision to Plan Hillcrest to include safe, all ages and abilities bike infrastructure on West University Avenue.

The Hillcrest Focused Plan Amendment leaves a crucial gap in the regional bikeway network on West University Avenue. With high vehicle volumes posing safety risks, especially near an elementary school, urgent action is needed. We propose extending the one-way configuration from First Avenue to Washington Street, creating space for a protected bikeway. This revision ensures safe mobility for all users and closes the gap in the complete streets network.

I86-2

Additionally, keeping in mind transit needs I would like to request the completion of the Park Boulevard Gap. Park Boulevard contains dedicated transit lanes for much of its length. However, there is a crucial gap between Upas Street and University Avenue. This gap can cause the bus lane network from Balboa Park to El Cajon Boulevard to fail when we need it the most (e.g, December Nights).

I86-3

Lastly please plan Future Bus Lanes on 4th and 5th Avenues: The new plan proposes significantly more density in Hillcrest. When combined with the densifying Bankers Hill, and the existing dense Downtown, residents will need an efficient transit option between the three neighborhoods. RideSD recommends that the City plan for a future in which 4th and 5th Avenues have dedicated transit lanes so that residents have that option.

I86-4

Many thanks for your time and consideration,  
Keala Rusher

**186: Responses to Keala Rusher Comment Letter**

**186-1:** The commenter provides introductory language regarding the content of this comment letter. This comment does not raise an issue related to the adequacy of the analysis contained within the Draft Program Environmental Impact Report (PEIR). No further response is required.

**186-2:** This comment does not raise an issue related to the adequacy of the analysis contained within the PEIR. No further response is required.

**186-3:** This comment does not raise an issue related to the adequacy of the analysis contained within the PEIR. No further response is required.

**186-4:** This comment does not raise an issue related to the adequacy of the analysis contained within the PEIR. No further response is required.

## Comment Letter I87 - Glenda Sacks

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update -- Draft EIR  
**Date:** Tuesday, April 30, 2024 9:12:19 AM

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**From:** Glenda Sacks <glendasacks@gmail.com>  
**Sent:** Sunday, April 28, 2024 8:49 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update -- Draft EIR

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

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### To Whom It May Concern:

Below are my comments and objections to several parts of the City of San Diego's University Community Plan Update Draft EIR (DEIR) as several of them are legally deficient:

I87-1

I. Changes to Governor Drive: Converting Governor Drive from a four-lane Major Arterial to two-lanes may actually fail the legal test because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. **No changes to Governor Drive can be made without a current Traffic Analysis and VMT performed at peak hour traffic times.**

I87-2

#### II. Emergency Access/Ingress:

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as it's proximity to MCAS Miramar, just to name two factors. **The City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.** Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I87-3

III. School Requirements from the San Diego School District Must Be Met: The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. **Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.**

I87-4

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. **The DEIR needs to be revised to include the community's preferred alternative.**

I87-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. **The DEIR should be separated into three separate EIRs for each proposed plan update.**

187-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. **Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing**

187-7

187-8

**187: Responses to Glenda Sacks Comment Letter**

**187-1:** Comment noted.

**187-2:** See response to comments O13-1 and O13-2 under comment letter O13.

**187-3:** See response to comment O13-3 under comment letter O13.

**187-4:** See response to comment O13-4 under comment letter O13.

**187-5:** See response to comment O13-5 under comment letter O13.

**187-6:** See response to comment O13-6 under comment letter O13.

**187-7:** See response to comment O13-7 under comment letter O13.

**187-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I89 - Paul Savage

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] San Diego Density Increase Plan  
**Date:** Tuesday, April 30, 2024 8:54:00 AM

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**From:** Paul Savage <psfireball@gmail.com>  
**Sent:** Friday, April 26, 2024 12:20 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] San Diego Density Increase Plan

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### To Whom It May Concern:

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I88-1

### Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I88-2

I88-3

I88-4

### Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I88-5

### New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces,

I88-6

on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

188-6 cont

### **Vons & Sprouts Centers New Height and Sharply Higher Density Allowances**

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

188-7

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

### **Planning Deficiencies in Parks**

Under the City's 'Master Plan', the UC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

188-8

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents' input, and intentionally erodes single-family neighborhoods.

188-9

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

188-10

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

188-11

Paul Savage - Cambridge Terrace HOA



**I88: Response to Paul Savage Comment Letter**

**I88-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted and no further response is required.

**I88-2:** See response to comment I8-2 under comment letter I8.

**I88-3:** See response to comment I8-3 under comment letter I8.

**I88-4:** See response to comment I8-4 under comment letter I8.

**I88-5:** See response to comment I8-5 under comment letter I8.

**I88-6:** See response to comment I8-6 under comment letter I8.

**I88-7:** See response to comment I8-7 under comment letter I8.

**I88-8:** See response to comment I8-8 under comment letter I8.

**I88-9:** The comment generally addresses overall concerns with the proposed University Community Plan Update. It does not address the adequacy of the environmental analysis in the Draft PEIR. The concerns have been noted; no further response is necessary.

**I88-10:** The comment is about a previous project that is not a part of the project evaluated in the Draft PEIR. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

**I88-11:** The comment has been noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

# Comment Letter I89 - Brendan Shannon

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on University Community Plan Update Draft EIR  
**Date:** Thursday, April 25, 2024 8:12:38 AM

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**From:** Brendan Shannon <brendanrshannon@gmail.com>  
**Sent:** Thursday, April 25, 2024 6:10 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments on University Community Plan Update Draft EIR

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Good morning,

Here are my comments and requested changes:

I. No Changes to Governor Drive: Converting Governor Drive from a four-lane to a two-lane arterial with bike lanes will significantly impact transportation, as shown by the questionable Vehicle Miles Traveled results from the outdated Draft Mobility Technical Report. Any changes should be contingent upon a current Traffic Analysis during peak hours, reflecting actual conditions when schools are active and events occur at Standley Park.

I89-1

II. Emergency Access in South UC: Despite claims of adequate emergency access in the DEIR, reducing Governor Drive to two lanes could compromise emergency response. A detailed analysis of emergency access with the proposed lane reductions is necessary before concluding that impacts are insignificant.

I89-2

III. School Facility Requirements: The DEIR mentions no new schools, yet directs coordination with the San Diego School District to meet future educational needs. However, a critical recommendation for a new school site was omitted from the DEIR, undermining the plan's completeness.

I89-3

IV. Inclusion of Community-Preferred Plan: The DEIR lacks a sufficient range of alternatives for the University CPU, only offering one unfeasible high-density option. CEQA requires a reasonable range, including the community's preferred plan, which should be incorporated into the analysis.

I89-4

V. Separate DEIRs for Each Plan Update: The current DEIR, covering multiple distinct areas and policy updates, is too complex and broad, failing to meet CEQA's informational goals. It should be divided into separate EIRs for each area and plan to ensure clarity and accessibility.

I89-5

VI. Comprehensive Environmental Impact Evaluation: The DEIR inadequately addresses the full spectrum of environmental impacts at full buildout of the University CPU. It should thoroughly analyze impacts on aesthetics, air quality, biological resources, greenhouse gas emissions, noise, public services, recreation, transportation, and wildfire risks, including those under the Complete Communities Housing Solutions program.

I89-6

I89-7

Thank you,

Brendan Shannon

**189: Responses to Brendan Shannon Comment Letter**

**189-1:** See response to comments O13-1 and O13-2 under comment letter O13.

**189-2:** See response to comment O13-3 under comment letter O13.

**189-3:** See response to comment O13-4 under comment letter O13.

**189-4:** See response to comment O13-5 under comment letter O13.

**189-5:** See response to comment O13-6 under comment letter O13.

**189-6:** See response to comment O13-7 under comment letter O13.

**189-7:** See response to comment O13-8 under comment letter O13.

## Comment Letter I90 - Mirian Shnaidman

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:20:37 AM

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**From:** Hola hola <miriansrossi@yahoo.com>  
**Sent:** Monday, April 29, 2024 12:22 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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

To Whom It May Concern:

Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

**I. No Changes Should Be Made to Governor Drive.** Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I90-1

I90-2

**II. Emergency Access to South UC Must Be Maintained.** The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I90-3

**III. School Requirements from the San Diego School District Must Be Met.** The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU,

I90-4

as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I90-4  
cont.

**IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis.** CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I90-5

**V. The City Should Prepare a DEIR Specific to the University CPU.** Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I90-6

**VI. The DEIR Should Evaluate the Full Spectrum of Environmental**

**Impacts:** The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I90-7

I90-8

Sincerely,

Mirian Schnaidman, University City resident (92122)

**I90: Responses to Mirian Schnaidman Comment Letter**

**I90-1:** See response to comment O13-1 under comment letter O13.

**I90-2:** See response to comment O13-2 under comment letter O13.

**I90-3:** See response to comment O13-3 under comment letter O13.

**I90-4:** See response to comment O13-4 under comment letter O13.

**I90-5:** See response to comment O13-5 under comment letter O13.

**I90-6:** See response to comment O13-6 under comment letter O13.

**I90-7:** See response to comment O13-7 under comment letter O13.

**I90-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I91 - Jim Smith

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] City of San Diego's University Community Plan Update Draft EIR (DEIR): Comments  
**Date:** Thursday, April 25, 2024 8:11:45 AM

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**From:** Jim <jim7sd@gmail.com>  
**Sent:** Wednesday, April 24, 2024 5:22 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>  
**Subject:** [EXTERNAL] City of San Diego's University Community Plan Update Draft EIR (DEIR): Comments

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To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. Survey's show bicycle ridership comprises only 4% of the population!

I91-1

I91-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I91-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the

I91-4

University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I91-4  
cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I91-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I91-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I91-7

I91-8

Sincerely,

Jim Smith  
University City resident



**I91 Responses to Jim Smith Comment Letter**

**I91-1:** See response to comment O13-1 under comment letter O13.

**I91-2:** See response to comment O13-2 under comment letter O13.

**I91-3:** See response to comment O13-3 under comment letter O13.

**I91-4:** See response to comment O13-4 under comment letter O13.

**I91-5:** See response to comment O13-5 under comment letter O13.

**I91-6:** See response to comment O13-6 under comment letter O13.

**I91-7:** See response to comment O13-7 under comment letter O13.

**I91-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I92 - Richard Sted and Nancy Klein-Sted

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Response to San Diego's Density Increase Plan  
**Date:** Tuesday, April 30, 2024 8:59:57 AM

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**From:** rsted@san.rr.com <rsted@san.rr.com>  
**Sent:** Saturday, April 27, 2024 11:08 AM  
**To:** Gloria, Todd <MayorToddGloria@sandiego.gov>  
**Cc:** CouncilMember Kent Lee <KentLee@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; 'tomlins@sandiego.gov' <tomlins@sandiego.gov>  
**Subject:** [EXTERNAL] Response to San Diego's Density Increase Plan

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To those noted above:

As University City residents, my wife and I are contacting you to express our objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the "Housing Action Plan" part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I92-1

Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets". It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I92-2

I92-3

I92-4

Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I92-5

New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315

I92-6

"luxury" apartments with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

**I92-6 cont.**

Several years ago, a proposal recommending the completion of the Regents Road Bridge over Rose Canyon was defeated at the ballot box. Given the massive construction of apartments that has taken place both on the UTC mall property and the two major towers completed on the southwest side of La Jolla Village Drive and Genesee, it would seem appropriate to reconsider the Regents Road Bridge completion as a necessary project to alleviate the expected traffic gridlock that would result from the addition of several new high-density projects under consideration.

**I92-7**

#### Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von's shopping plaza on Governor/Genesee to 100 feet or 10 stories with residential units added to those areas. That alone will further impact all kinds of mobility along Governor Drive and onto Genesee as well as to the 805 to the east, and Regents toward the west where a similar plan is on deck for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

**I92-8**

Thank you for your time and consideration. Such initiatives call for planning that balances growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

**I92-9**

Sincerely,

Richard L Sted  
Nancy L Kline-Sted  
Cambridge Terrace Association  
4411 Caminito Sana Unit #1  
San Diego, CA 92122-5415

**I92: Response to Richard Sted and Nancy Kline-Sted Comment Letter**

**I92-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report. The comment has been noted and no further response is required.

**I92-2:** See response to comment I8-2 under comment letter I8.

**I92-3:** See response to comment I8-3 under comment letter I8.

**I92-4:** See response to comment I8-4 under comment letter I8.

**I92-5:** See response to comment I8-5 under comment letter I8.

**I92-6:** See response to comment I8-6 under comment letter I8.

**I92-7:** The comment has been noted.

**I92-8:** See response to comment I8-7 under comment letter I8.

**I92-9:** The comment has been noted.

## Comment Letter I93 - Don Steele

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 8:53:49 AM

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**From:** Don Steele <desteele@aol.com>  
**Sent:** Friday, April 26, 2024 11:58 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; universitycitypeeps@gmail.com  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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### To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I93-1

I93-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I93-3

III. School Requirements from the San Diego School District Must Be Met. The DEIR

I93-4

states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

193-4 cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

193-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

193-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

193-7

193-8

Sincerely,

Donald E Steele  
3436 Millikin Ave.  
San Diego, CA 92122

**I93 Responses to Donald Steele Comment Letter**

**I93-1:** See response to comment O13-1 under comment letter O13.

**I93-2:** See response to comment O13-2 under comment letter O13.

**I93-3:** See response to comment O13-3 under comment letter O13.

**I93-4:** See response to comment O13-4 under comment letter O13.

**I93-5:** See response to comment O13-5 under comment letter O13.

**I93-6:** See response to comment O13-6 under comment letter O13.

**I93-7:** See response to comment O13-7 under comment letter O13.

**I93-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I94 - Becky and Ed Suedkamp

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University Community plan  
**Date:** Friday, April 26, 2024 10:51:22 AM

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**From:** Galloway, Tait <[TGalloway@sandiego.gov](mailto:TGalloway@sandiego.gov)>  
**Sent:** Thursday, April 25, 2024 5:16 PM  
**To:** PLN University Community Plan Update <[planuniversity@sandiego.gov](mailto:planuniversity@sandiego.gov)>; PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Subject:** FW: [EXTERNAL] University Community plan

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**From:** Becky Suedkamp <[becky.suedkamp@gmail.com](mailto:becky.suedkamp@gmail.com)>  
**Sent:** Thursday, April 25, 2024 4:42 PM  
**To:** Gloria, Todd <[MayorToddGloria@sandiego.gov](mailto:MayorToddGloria@sandiego.gov)>  
**Cc:** CouncilMember Kent Lee <[KentLee@sandiego.gov](mailto:KentLee@sandiego.gov)>; Galloway, Tait <[TGalloway@sandiego.gov](mailto:TGalloway@sandiego.gov)>; Tomlins, Coby <[CTomlins@sandiego.gov](mailto:CTomlins@sandiego.gov)>; Lukes, Suchitra <[SLukes@sandiego.gov](mailto:SLukes@sandiego.gov)>; Causman, Nathen <[NCausman@sandiego.gov](mailto:NCausman@sandiego.gov)>; CouncilMember Joe LaCava <[JoeLaCava@sandiego.gov](mailto:JoeLaCava@sandiego.gov)>  
**Subject:** [EXTERNAL] University Community plan

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### To Whom It May Concern:

Below are my comment to the City of San Diego's revised University Community Plan Update (University CPU):

**I. The City Should Reduce the Proposed Housing Density By at Least Half.** The City's proposed plan would add another 30,480 housing units to University City's (UC) existing 26,520 units, and increase the number of residents from 64,206 to a total of 129,566, thus more than doubling the population. This scenario is unwarranted, unsustainable, and representative of exceptionally poor planning. SANDAG's latest Series 15 forecasts that the entire City of San Diego will have just 65,345 more residents by the year 2050; adding that entire population increase to UC alone, rather than spreading it out evenly among all 52 San Diego communities, is nonsensical. The existing infrastructure cannot support such a drastic population increase, and there is no more available land (nor adequate budget) to provide more. With more people will come more carbon emissions from traffic congestion, especially given the community's restricted traffic grid, which defeats the City's Climate Action Plan. Fewer parks, recreational centers, schools, and other public facilities will substantially lower residents' quality of life. With inadequate fire & safety coverage, the community will also suffer more crime and deaths. The City must drastically cut back its density proposal to no more than 15,000 additional housing units.

I94-1

I94-2

I94-3

I94-4

I94-5

I94-6



**II. Governor Drive Should Not Be Reduced to Two Lanes to Accommodate Bike Lanes.** The City relied on an eight-year-old VTM forecast from SANDAG's Series 14 that doesn't accurately reflect the amount of traffic there is on Governor Drive today, particularly during peak hours when parents drop off and pick up their children from the three schools, and when events are underway at Standley Park. No changes to Governor Drive should be made without a current and thorough Traffic Analysis that also takes into consideration the proposed up-zoning at both south UC retail centers and four corners of Genesee Avenue and Governor Drive.

194-7

194-8

**III. The Proposed Up-zoning of the South UC Shopping Centers Should be Lowered.** The City has proposed that the Sprouts and Vons shopping centers be changed to CC-3-8 zoning, with 0-73 dwelling units per acre. This means they could be 100 feet high with mere 10-foot setbacks from adjacent, largely single-family residential properties, and comprise as many as 572 units at the Sprouts center and 373 units at the Vons center. The City doesn't take into consideration that the Sprouts center is not an existing Transit Priority Area, and likely never will be given MTS' budget shortage. The City also does not consider that Governor Drive is already a highly congested main arterial and cannot support additional traffic, nor does it take into account the safety of children attending the three schools and using Standley Park Recreation Center along with the two aquatic centers. The City needs to reduce the height limit zoning at the Sprouts center to 40 feet and the housing density to 0-29 du/ac, and lower the height limit zoning at the Vons center to 50 feet and the housing density to 0-54 du/ac in order to lower the impact on adjacent properties and minimize traffic congestion.

194-9

**IV. Customer Parking Should be Maintained at South UC Shopping Centers.** The current number of commercial parking spaces at each location should be kept available, and residential projects must require at least one residential parking space per dwelling unit. The revised University CPU should contain language that ensures retail shoppers they will have enough free parking when they patronize the centers.

194-10

**V. The City Needs to Find Sounder Solutions to Providing Additional Recreation Centers.** University City's proposed population increase warrants at least 2.8 more recreation centers. However, the City has only proposed there be one new recreation center by converting the Scripps Shiley Center, which sits on city-leased land. This proposed new site is unacceptable since it's located in La Jolla along Torrey Pines Road, too far from any UC residential neighborhoods and the very residents it's supposed to serve.

194-11

**VI. More Solutions are Needed for Larger, Usable Park Space.** The City's revised University CPU proposes only two new park areas, both of which are far away from residential areas and unusable for normal recreational activities such as soccer and baseball. The plan discusses ways that will be sought to create "more places to walk, bike, play and interact with each other," but it doesn't provide sound solutions to accommodate sports nor come close to improving UC's current park deficit and relatively low ranking on the ParkScore Index.

194-12

VII. The City's Argument that People will Give up their Cars is Unfounded. There are no studies that prove the notion that people are willing to take public transit rather than own cars, rendering the City's argument baseless. In addition to residents and UCSD students, such a study would need to take into account all the vehicle traffic that will be generated by new and existing employment centers as well as tourists. South UC's demographics are largely families with young children and pets, as well as seniors; this population cannot readily adapt to walking, biking and using public transit for their daily activities, let alone evacuate in the event of a wildfire or earthquake at the very same time emergency responders are trying to access the emergency.

I94-13

I94-14

San Diego's public transportation system is sorely inadequate and will never serve our population in the manner that public transit serves some other cities that were originally planned for it, such as New York City; besides, MTS does not have the budget to expand San Diego's transit system or make major improvements. Across the city, people are moving toward EVs instead.

I94-15

The City's desperate attempt to imply that public transit is a solution was to make the transit area a full mile from a Transport Priority Area rather than a half mile, when neither is likely to work for family activities, grocery shopping, and various commute patterns to work.

I94-16

VII. The University CPU Needs to Address Fire & Safety. While the revised University CPU shows current fire and police station placement, it does not suggest any new fire or police stations for our area. The City spent \$30 million on a new fire station to accommodate a relatively small population of residents who were opposed to the Regents Road Bridge. There is no analysis of current and projected response times. UC is already behind city targets for fire and safety coverage, and more than doubling our population in UC could make us one of the most vulnerable communities in San Diego. It's imperative the University CPU makes accommodations for these vital services, and that fire safety infrastructure is completed before further density is added.

I94-17

VIII. The University CPU Needs to Take into Account UC's Vulnerability to Wildfires. Approximately 75 percent of UC falls within a Very High Fire Hazard Severity Zone. Yet, there is no discussion in either the revised University CPU nor the DEIR about how the enormous population increase proposed by the City will impact the community nor how it will be addressed. Climate change will only serve to exacerbate the dangers posed by wildfires in the years to come. The University CPU must address this reality and discuss how the City is prepared to respond to the UC community and its residents in the event of a disaster. Fire response infrastructure needs to be put in place before any future development.

I94-18

IX. Housing Affordability Must Be a High Priority. Much of the justification by the City for creating such enormous density in UC is to provide workforce housing for those employed in the area so they don't have to commute from other areas of the City. A goal stated in the University CPU reads, "To provide a housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups,

I94-19

household sizes and compositions, tenure patterns and income levels." Rather than simply stating goals and guidelines, the University CPU needs to describe what conditions it will place on housing project developers in order to ensure that a large percentage of new units will be truly affordable to low- and middle-income households.

I94-19  
cont.

X. The Plan Update Must Detail the Funding Mechanisms to Pay for Needed Infrastructure, Public Facilities and Community Enhancements. A great deal of time and thought were put into the revised University CPU renderings and illustrations to allow viewers the ability to envision what UC might look like in the future. Without monies set aside to pay for any of it, however, the entire Plan is nothing more than a pipe dream.

I94-20

As residents of University City we fully support the revisions listed above

I94-21

Sincerely,

Becky and Ed Suedkamp

**I94: Response to Becky and Ed Suedkamp Comment Letter**

**I94-1:** Comment noted.

**I94-2:** See response to comment I13-2 under comment letter I13.

**I94-3:** See response to comment I13-3 under comment letter I13.

**I94-4:** See response to comment I13-4 under comment letter I13.

**I94-5:** See response to comment I13-5 under comment letter I13.

**I94-6:** Comment noted.

**I94-7:** See response to comments O13-1 and O13-2 under comment letter O13.

**I94-8:** See response to comment I13-8 under comment letter I13.

**I94-9:** See response to comment I8-7 under comment letter I8.

**I94-10:** See response to comment I13-10 under comment letter I13.

**I94-11:** See response to comment I13-11 under comment letter I13.

**I94-12:** See response to comment I13-12 under comment letter I13.

**I94-13:** See response to comment I13-13 under comment letter I13.

**I94-14:** See response to comment I13-14 under comment letter I13.

**I94-15:** See response to comment I13-15 under comment letter I13.

**I94-16:** See response to comment I13-16 under comment letter I13.

**I94-17:** See response to comment I13-17 under comment letter I13.

**I94-18:** See response to comment I13-18 under comment letter I13.

**I94-19:** See response to comment I13-19 under comment letter I13.

**I94-20:** See response to comment I13-20 under comment letter I13.

**I94-21:** Comment noted.

## Comment Letter I95 - Frank Swayze

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University City  
**Date:** Tuesday, April 30, 2024 9:07:56 AM

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**From:** fswayz@aol.com <fswayz@aol.com>  
**Sent:** Sunday, April 28, 2024 1:04 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] University City

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To Whom It May Concern:

As a University City resident, I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report. There are several key concerns, some of which already were rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. The following are some of those concerns:

I95-1

### Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that, while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets." It has been confirmed that the City has not done a comprehensive Traffic Study since 2015, and is basing the Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I95-2

### Emergency Ingress/Egress

Related to the Governor Drive lane reductions when combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time or, worse yet, if residents need to evacuate in the event of a disaster. The area already is in a potential wildfire zone and faces proximity to MCAS Miramar, to name just two factors. Again, the City is legally obligated to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I95-3

### New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing. Such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

I95-4

Vons & Sprouts Centers New Height and Sharply Higher Density Allowances

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights at the Von's shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas. That alone will further impact all f mobility along Governor Drive and onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is envisioned for the Sprout's shopping plaza. The Sprout's shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

195-5

#### Planning Deficiencies in Parks

Under the City's "Master Plan," the UTC area is already short on publicly accessible parks – not "greenways" or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

195-6

In summary, these initiatives ignore the need for a workable and supportive infrastructure. They fail to provide even somewhat affordable housing, disregard existing residents' input, and intentionally erode single-family neighborhoods. The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and contained no parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

195-7

Thank you for your time and consideration. Such initiatives call for planning that balances growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in the decision-making process.

195-8

Sincerely,  
Frank Swayze, Member  
Nobel Terrace Villas de Oro Homeowners Association

**I95: Response to Frank Swayze Comment Letter**

**I95-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted, and no further response is required.

**I95-2:** See response to comments I8-2, I8-3 and I8-4 under comment letter I8.

**I95-3:** See response to comment I8-5 under comment letter I8.

**I95-4:** See response to comment I8-6 under comment letter I8.

**I95-5:** See response to comment I8-7 under comment letter I8.

**I95-6:** See response to comment I8-8 under comment letter I8.

**I95-7:** See response to comments I8-9 and I8-10 under comment letter I8.

**I95-8:** The comment has been noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I96 - Huixian Tang

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Housing Action Plan  
**Date:** Tuesday, April 30, 2024 8:41:50 AM

---

**From:** huixian Tang <huixiant@yahoo.com>  
**Sent:** Friday, April 26, 2024 10:30 AM  
**To:** CouncilMember Kent Lee <KentLee@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>  
**Cc:** tomlins@sandiego.gov; ncausman@sandiego.gov; Lukes, Suchitra <SLukes@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] Housing Action Plan

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Dear Mr. Lee

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I96-1

### Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I96-2

I96-3

I96-4

### Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I96-5

### New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising

I96-6



1,315 “luxury” apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

I96-6  
cont.

### **Vons & Sprouts Centers New Height and Sharply Higher Density Allowances**

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von’s shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

I96-7

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout’s shopping plaza. The Sprout’s shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

### **Planning Deficiencies in Parks**

Under the City’s ‘Master Plan’, the UC area is already short on publicly accessible parks – not “greenways” or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

I96-8

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents’ input, and intentionally erodes single-family neighborhoods.

I96-9

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

I96-10

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

I96-11

Huixian Tang

Cambridge Terrance Owner's Association

**I96: Response to Huixian Tang Comment Letter**

**I96-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted, and no further response is required.

**I96-2:** See response to comment I8-2 under comment letter I8.

**I96-3:** See response to comment I8-3 under comment letter I8.

**I96-4:** See response to comment I8-4 under comment letter I8.

**I96-5:** See response to comment I8-5 under comment letter I8.

**I96-6:** See response to comment I8-6 under comment letter I8.

**I96-7:** See response to comment I8-7 under comment letter I8.

**I96-8:** See response to comment I8-8 under comment letter I8.

**I96-9:** The comment generally addresses overall concerns with the proposed University Community Plan Update. It does not address the adequacy of the environmental analysis in the Draft PEIR. The concerns have been noted; no further response is necessary.

**I96-10:** The comment is about a previous project that is not a part of the project evaluated in the Draft PEIR. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

**I96-11:** The comment has been noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I97 - Tatjana Tomic

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Hillcrest Focused Plan Amendment  
**Date:** Wednesday, April 24, 2024 8:06:44 AM

---

**From:** Tatjana Tomic <tatjanatomic@icloud.com>

**Sent:** Tuesday, April 23, 2024 8:51 PM

**To:** PLN Hillcrest Focused Amendment <planhillcrest@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>; Councilmember Stephen Whitburn <StephenWhitburn@sandiego.gov>; Darsey, Ryan <RDarsey@sandiego.gov>; Latchford, Jordan <JLatchford@sandiego.gov>

**Subject:** [EXTERNAL] Hillcrest Focused Plan Amendment

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To Whom It May Concern:

My name is Tatjana Tomic, a concerned resident and a mother of three. I am here to discuss the importance of revising safe, all ages and abilities bike infrastructure on West University Avenue.

The Hillcrest Focused Plan Amendment leaves a crucial gap in the regional bikeway network on West University Avenue. With high vehicle volumes posing safety risks, especially near an elementary school, urgent action is needed. We propose extending the one-way configuration from First Avenue to Washington Street, creating space for a protected bikeway. This revision ensures safe mobility for all users and closes the gap in the complete streets network.

Thank you for your consideration,

Tatjana

I97-1

**197: Response to Tatjana Tomic Comment Letter**

**197-1:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

**Comment Letter I98 - Diane Voit**

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:05:33 AM

**From:** [dianevoit@gmail.com](mailto:dianevoit@gmail.com) <[dianevoit@gmail.com](mailto:dianevoit@gmail.com)>  
**Sent:** Sunday, April 28, 2024 7:43 AM  
**To:** [PLN\\_PlanningCEQA](mailto:planningceqa@sandiego.gov) <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** Gloria, Todd <[MayorToddGloria@sandiego.gov](mailto:MayorToddGloria@sandiego.gov)>; CouncilMember Kent Lee <[KentLee@sandiego.gov](mailto:KentLee@sandiego.gov)>; Tomlins, Coby <[CTomlins@sandiego.gov](mailto:CTomlins@sandiego.gov)>; Lukes, Suchitra <[SLukes@sandiego.gov](mailto:SLukes@sandiego.gov)>; Galloway, Tait <[TGalloway@sandiego.gov](mailto:TGalloway@sandiego.gov)>; Causman, Nathen <[NCausman@sandiego.gov](mailto:NCausman@sandiego.gov)>; CouncilMember Joe LaCava <[JoeLaCava@sandiego.gov](mailto:JoeLaCava@sandiego.gov)>; [universitycitypeeps@gmail.com](mailto:universitycitypeeps@gmail.com)  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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

To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

**I. No Changes Should Be Made to Governor Drive.** Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I98-1

I98-2

**II. Emergency Access to South UC Must Be Maintained.** The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I98-3

**III. School Requirements from the San Diego School District Must Be Met.** The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve

I98-4

the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

198-4 cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

198-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

198-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

198-7

198-8

Sincerely,

Diane Voit

**I98 Responses to Diane Voit Comment Letter**

**I98-1:** See response to comment O13-1 under comment letter O13.

**I98-2:** See response to comment O13-2 under comment letter O13.

**I98-3:** See response to comment O13-3 under comment letter O13.

**I98-4:** See response to comment O13-4 under comment letter O13.

**I98-5:** See response to comment O13-5 under comment letter O13.

**I98-6:** See response to comment O13-6 under comment letter O13.

**I98-7:** See response to comment O13-7 under comment letter O13.

**I98-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I99 - Kacey Walker

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments on the Draft Program Environmental Impact Report (DPEIR) for the University City Community Plan  
**Date:** Tuesday, April 30, 2024 9:28:26 AM

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**From:** Kacey Walker <katharine.c.walker@gmail.com>  
**Sent:** Monday, April 29, 2024 7:52 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** CouncilMember Kent Lee <KentLee@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; Gloria, Todd <MayorToddGloria@sandiego.gov>  
**Subject:** [EXTERNAL] Comments on the Draft Program Environmental Impact Report (DPEIR) for the University City Community Plan

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I would like to make some comments on the analysis performed for the University Community Plan Update. I99-1

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project. I99-2

2. The City's failure to evaluate the full environmental impacts of the University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. I99-3

3. The City's failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate. I99-4

4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density I99-5



Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the “community-preferred alternative” (Scenario B) in the City’s last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn’t feasible.

**I99-5  
cont.**

5. Finally, the City’s conclusion that the High Density Alternative was the environmentally superior alternative isn’t supported by the evidence. Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City’s own conclusion states, “No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project.”

**I99-6**

The City should revise the DPEIR to address these issues.

**I99-7**

Thank you,  
Kacey Walker

**I99: Responses to Kacey Walker Comment Letter**

**I99-1:** The comment is an introduction to the letter. No response is required.

**I99-2:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I99-3:** See response to comment I11-3 under comment letter I11.

**I99-4:** See response to comment I11-4 under comment letter I11.

**I99-5:** See response to comment I11-5 under comment letter I11.

**I99-6:** See response to comment I11-6 under comment letter I11.

**I99-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.

## Comment Letter I100 - Stephanie Webber

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:11:20 AM

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**From:** Stephanie Webber <[swebber7@gmail.com](mailto:swebber7@gmail.com)>  
**Sent:** Sunday, April 28, 2024 2:58 PM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** Gloria, Todd <[MayorToddGloria@sandiego.gov](mailto:MayorToddGloria@sandiego.gov)>; CouncilMember Kent Lee <[KentLee@sandiego.gov](mailto:KentLee@sandiego.gov)>; Galloway, Tait <[TGalloway@sandiego.gov](mailto:TGalloway@sandiego.gov)>; Tomlins, Coby <[CTomlins@sandiego.gov](mailto:CTomlins@sandiego.gov)>; Lukes, Suchitra <[SLukes@sandiego.gov](mailto:SLukes@sandiego.gov)>; Causman, Nathen <[NCausman@sandiego.gov](mailto:NCausman@sandiego.gov)>; CouncilMember Joe LaCava <[JoeLaCava@sandiego.gov](mailto:JoeLaCava@sandiego.gov)>; [universitycitypeeps@gmail.com](mailto:universitycitypeeps@gmail.com)  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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To Whom It May Concern:

Below are my comment to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

**I. No Changes Should Be Made to Governor Drive.** Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I100-1

I100-2

**II. Emergency Access to South UC Must Be Maintained.** The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I100-3

**III. School Requirements from the San Diego School District Must Be Met.** The DEIR states "No new schools are proposed as part of the University CPU; however, the

I100-4

University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I100-4 cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I100-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I100-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I100-7

I100-8

Sincerely,

Stephanie Webber, resident

5556 Stresemann St  
San Diego, CA 92122

**I100: Responses to Stephanie Webber Comment Letter**

**I100-1:** See response to comment O13-1 under comment letter O13.

**I100-2:** See response to comment O13-2 under comment letter O13.

**I100-3:** See response to comment O13-3 under comment letter O13.

**I100-4:** See response to comment O13-4 under comment letter O13.

**I100-5:** See response to comment O13-5 under comment letter O13.

**I100-6:** See response to comment O13-6 under comment letter O13.

**I100-7:** See response to comment O13-7 under comment letter O13.

**I100-8:** See response to comment O13-8 under comment letter O13.

# Comment Letter I101 - Robert Wiegand

From: Ash Reynolds, Tara on behalf of PLN\_PlanningCEQA  
 To: Lombrozo, Ari  
 Subject: FW: [EXTERNAL] Re: SCH No. 2021070359, Comments, Louis Rodolico  
 Date: Tuesday, April 30, 2024 9:20:58 AM

From: Robert Wiegand <wiegandrobert@aol.com>  
 Sent: Monday, April 29, 2024 12:38 PM  
 To: Louis Rodolico <lourodolico@yahoo.com>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
 Subject: [EXTERNAL] Re: SCH No. 2021070359, Comments, Louis Rodolico

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All true

Sent from the all new AOL app for iOS

On Monday, April 29, 2024, 12:00 PM, Louis Rodolico <lourodolico@yahoo.com> wrote:

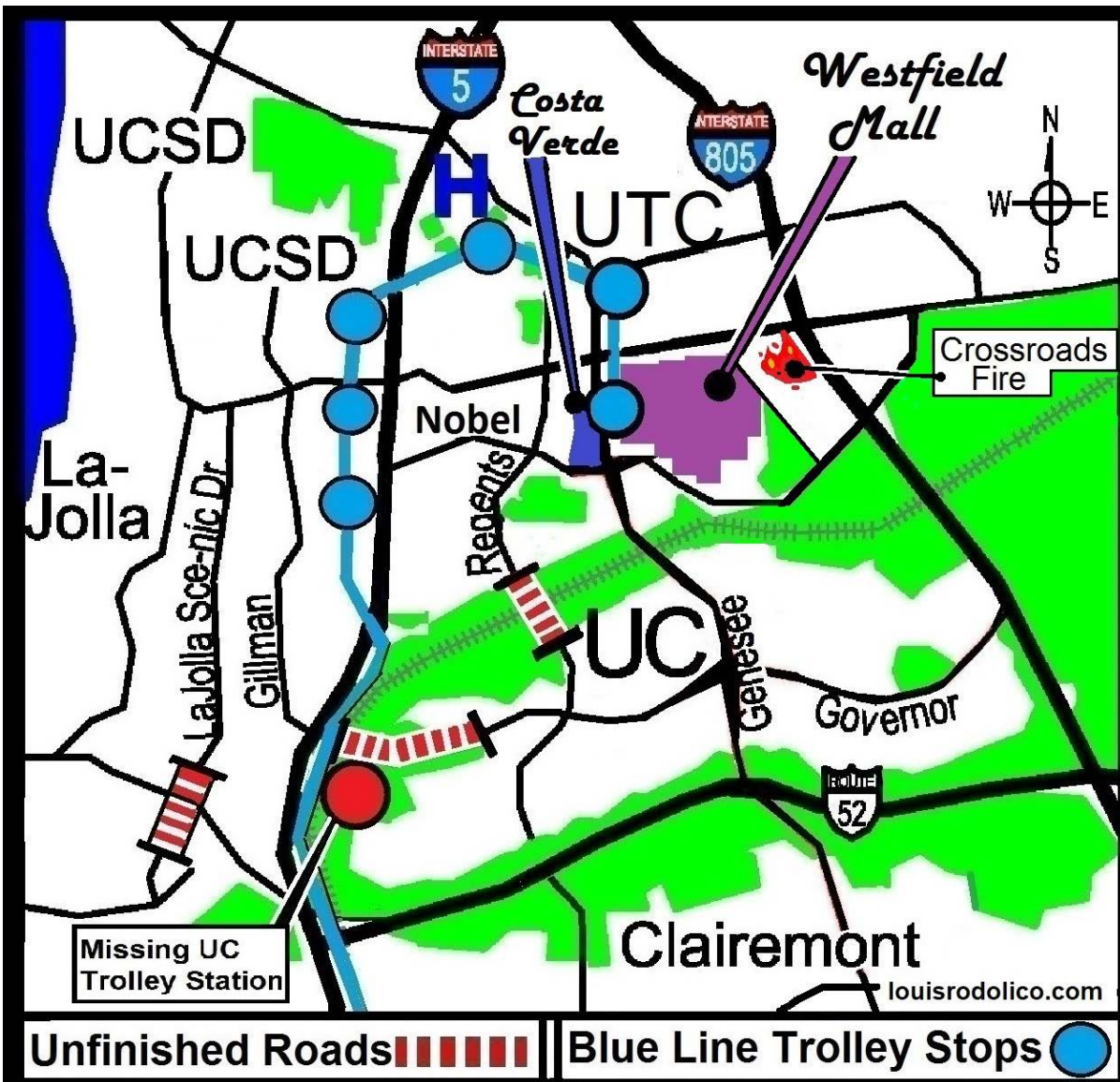
## DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT SCH No. 2021070359

BLUEPRINT SD INITIATIVE, HILLCREST FOCUSED PLAN AMENDMENT TO THE UPTOWN COMMUNITY PLAN, AND UNIVERSITY COMMUNITY PLAN AND LOCAL COASTAL PROGRAM UPDATE

Comments: Louis Rodolico April 29, 2024

8.1 Project Alternative Page 8-4 PDF Page 767

The 8.1 project alternative is the same one planning has been pushing for some time. Map PDF page 780. It makes sense to have higher density along main roads like Governor Drive, but only if those roads have been completed and can serve ambulances and conflagration egress. See map of South UC's unfinished roads:



I101-1

Note: only one of the three originally planned roads have been completed. Knowing the overwhelming majority of the community wanted the Regents Road Bridge the Lightner Administration, in service of its clients (not us) did not want to put it on the ballot, which would have been the democratic thing to do. We wonder why democracy is in trouble it is because: shareholders, lobbyists and other special interests are successful in pushing democracy to the side.

I101-2

In the bridge case a major special interest was Westfield Mall Shareholders who lost their bid in the 1960's to have their mall where 52 and Marian Bear Park are currently located. This would have been a direct pipeline to wealthy La Jolla. Still burning about it, decades later, Westfield paid a half million dollars to get control of the traffic study to remove the Regents Road Bridge. [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)

| I101-3

The more cars Westfield could funnel up Genesee the higher the mall rents. Westfield Operatives conveniently left ambulance service times out of the Bridge EIR. Following that tradition this Draft EIR only mentions Ambulances once with no mention of service times. Open Space is mentioned 99 times, which is completely out of balance. Also planning continues to falsely describe undeveloped land as Open Space. In University this is a de-facto cry for an arsonist/hero to come forward for projects on undeveloped land.

| I101-4  
| I101-5

The "E" in CEQA stands for both the natural and human environments but planning has consistently ignored human needs in favor or fear of special interests, like the "At Large" Crossroads Arsonists and their supporters. The City is justifiably afraid of the Crossroads Arsonists. The Friends of Rose Canyon uses the Crossroads Arsonists as a cudgel to threaten the community. This is why we need things on a private government ballot so citizens cannot be intimidated by criminals. The same can be said for the ill-informed and un-studied demand that Governor Drive be reduced to two lanes. Planning should not allow itself to be intimidated, please put it on the ballot.

| I101-6

Allowing democracy to play its part in our city, in the past, would have given planning a complete road system in South UC and a much better argument for the higher density as outlined in 8.1.

| I101-7

Respectfully Submitted

Louis Rodolico

**I101: Response to Robert Wiegand Comment Letter**

**I101-1:** See response to comment I83-1 under comment letter I83.

**I101-2:** Comment noted. The Regents Road Bridge is not a part of the proposed project.

**I101-3:** Comment noted. The Regents Road Bridge is not a part of the proposed project.

**I101-4:** See response to comment I83-4 under comment letter I83.

**I101-5:** See response to comment I83-5 under comment letter I83.

**I101-6:** See response to comment I83-6 under comment letter I83.

**I101-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report. No further response is required.



## Comment Letter I102 - Andrew Wiese

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University Community Plan D-EIR - Public Comments - Wiese  
**Date:** Tuesday, April 30, 2024 9:21:42 AM  
**Attachments:** [D-EIR UCPlan Comments AWiese 4-26-24\\_pt 1.docx](#)

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**From:** Andrew Wiese <[awiese@sdsu.edu](mailto:awiese@sdsu.edu)>  
**Sent:** Monday, April 29, 2024 1:49 PM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Subject:** [EXTERNAL] University Community Plan D-EIR - Public Comments - Wiese

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To whom it may concern:

Please accept the following comments on the D-EIR for the University Community Plan.

Thank you,

Andrew Wiese  
2936 Gobat Ave  
San Diego (University City)  
92122

I102-1

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University Community Plan D-EIR - Public Comments - Wiese  
**Date:** Tuesday, April 30, 2024 9:21:42 AM  
**Attachments:** [D-EIR UCPlan Comments AWiese 4-26-24 pt 1.docx](#)

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**From:** Andrew Wiese <[awiese@sdsu.edu](mailto:awiese@sdsu.edu)>  
**Sent:** Monday, April 29, 2024 1:49 PM  
**To:** [PLN\\_PlanningCEQA <planningceqa@sandiego.gov>](mailto:planningceqa@sandiego.gov)  
**Subject:** [EXTERNAL] University Community Plan D-EIR - Public Comments - Wiese

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To whom it may concern:

Please accept the following comments on the D-EIR for the University Community Plan.

Thank you,

Andrew Wiese  
2936 Gobat Ave  
San Diego (University City)  
92122

**I102-2**

City of San Diego Planning Department  
9485 Aero Drive, M.S. 413  
San Diego, CA 92123  
E-Mail: [planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)

RE: Draft Comments on Draft Program EIR for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update:

April 26, 2024

To the City Planning Department, City of San Diego,

I102-3

Please accept the following comments.

**1) Errors in UC Plan D-EIR and Biological Resources Report – UCP – RE Open Space Parcels proposed for Dedication.**

There are significant errors in the University Community Plan D-EIR documents (Biological Resources Report) regarding the Open Space parcels proposed for dedication under Charter section 55.

**A). The Biological Resources Report mis-identifies (and omits) a portion of one of the approved parcels.**

I102-4

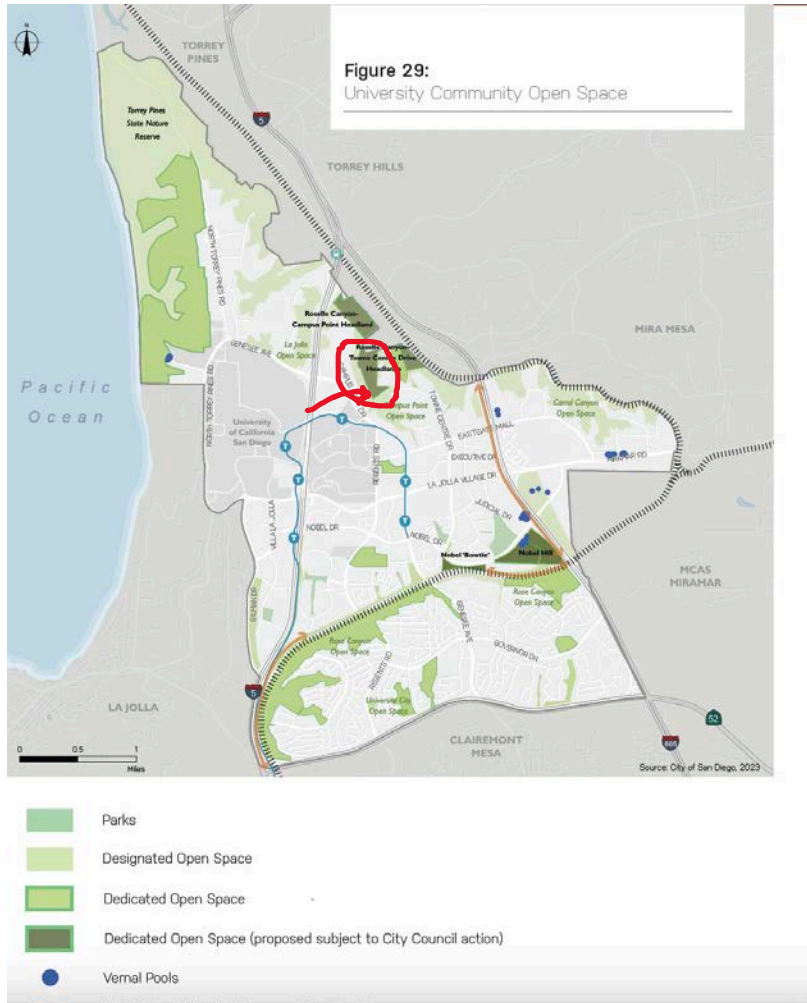
Specifically, **Figure 4**, “Post-Project MHPA and Conserved Lands,” **and Figure 5**, “Open Space to be Dedicated Pursuant to Charter 55,” **are in error.** (see below)

**Figures 4 and 5**, which identify the parcels proposed for Dedication pursuant to Charter section 55, **do not show all of the approved parcel K302 P3.**

Fortunately, the revised **Draft of the University Community Plan** (Figure 29) and The D-EIR, Figure 3-27) correctly identify the proposed parcels (see below).

Please correct the Biological Resources Report so that Figures 4 and 5 are **consistent with the Draft University Community Plan, Figure 29 and Figure 3-27, D-EIR, University Community Plan.**

Figure 29, D-UCPlan, (also Figure 3-27, D-EIR)



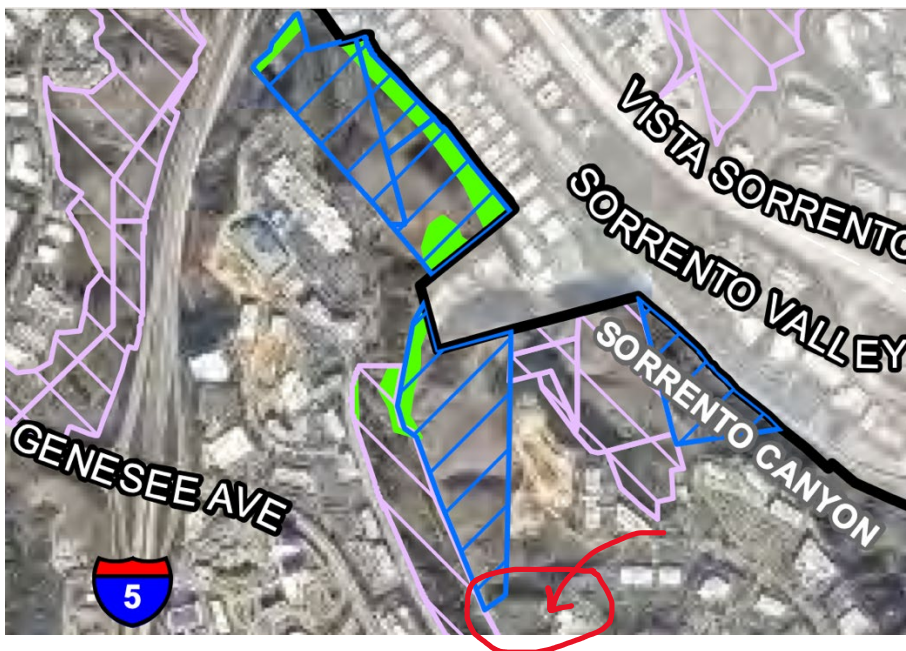
I102-4 cont.

D-UCP Figure 29 (above) and D-EIR Figure 3-27 accurately depict city owned open space parcels proposed for dedication under Charter section 55. Note parcel K302 P3 circled in red.

I102-4 cont.

Biological Resources Report, Figures 4 and 5 (below) omit part of parcel K302 P3. Missing section is circled in red on both figures.

Biological Resources Report, Figure 4. Post-Project MHPA and Conserved Lands,



I102-4 cont.

Figure 5: "Open Space to be Dedicated Pursuant to Charter 55"



I102-4 cont

**B).** In addition, the D-EIR and **Biological Resources Report** mis-state the total acreage proposed for dedication under Charter sec 55.

This appears to follow from the omission of part of one of the parcels (**K302 P3**).

The D-EIR and Biological Resources Report states that the total number of acres proposed for dedication is approximately 160.9 acres (Biological Resources Report, p 8), (D-EIR p 3-64).

The **correct acreage** is approximately **168.79 acres**.

**Note that the parcels are correctly identified** in the Draft UC Plan, see **Figure 29 AND in the D-EIR, Figure 3-27.**

**Correct acreages** are for these parcels are available via the City's City Owned Property tool:

<https://sandiego.maps.arcgis.com/apps/webappviewer/index.html?id=7cace2f50ec7459e84acaa98345c2806>

I102-5



**Recommended Action:**

Please correct the UC Plan D-EIR - Biological Resources Report to reflect these updates (include ALL of parcel K302 P3 and re-calculate total acreage reflecting this correction.

I102-5 cont

**2) Errors in Biological Resources Report – UCP - Open Space Parcels proposed for Dedication.**

- BRR, Figure 6 misidentifies urbanized lands in the University Community as undeveloped canyons.

- BRR, Figures 7a and 7b misidentify urbanized lands in the University Community as sensitive habitat.

I102-6

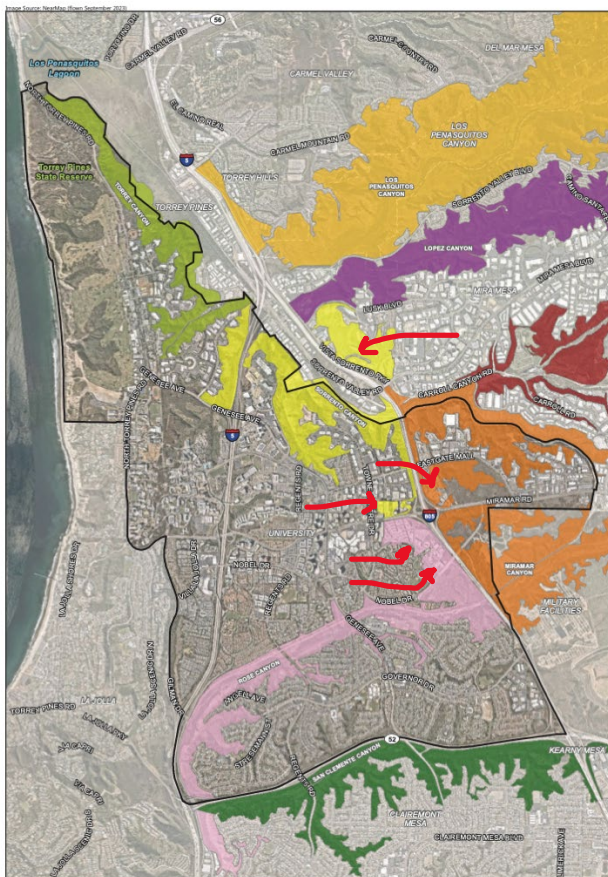


FIGURE 6  
Local Canyons

M:\085577\summon\_gab\4\4\Fig6.mxd 12/28/2023 1:54

i. - Figure 6 (above) **inaccurately identifies urbanized areas as “local canyons.”** See red arrows.

The D-EIR, Biological Resources Report refers to the highlighted portions of Figure 6 as *“undeveloped, urban canyons (i.e., the majority of Rose Canyon, and portions of Miramar Canyon [Figure 6]) and other undeveloped hillsides.”* (BRR, p. 18).

Unfortunately, **several areas identified as “undeveloped urban canyons” are highly urbanized.**

For instance, the figure shows Rose Canyon extending north of Nobel Drive to La Jolla Village Drive west of I-805. This area includes the main campus of Illumina, La Jolla Crossroads apartments, and other areas of housing and industry.

The same error is made with several other “canyons” represented in Figure 6.

Please note that this **level of fundamental inaccuracy calls into question the accuracy of the Biological Resources Report as a whole.**

**Recommended Action:**

Please correct the Biological Resources Report to accurately reflect differences between urbanized and un-urbanized area in the University Community.

ii. - **Figures 7a and 7b, “Vegetation Communities and Land Cover Types,” misidentify urbanized lands** in the University Community as **sensitive habitat.**

Property west of Interstate 805 between Nobel Drive and Eastgate Mall is represented on the map as Diegan Coastal Sage Scrub and Valley and Foothill Grassland, two rare and sensitive habitat types.

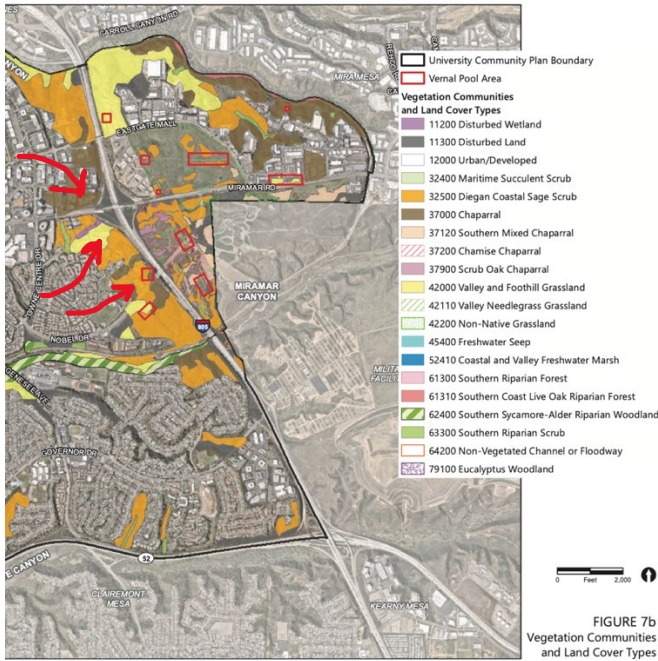
However, these areas are fully developed with urban uses (and have been for between 10-20 years).

*Figure 7b: “Vegetation Communities and Land Cover Types,”*

I102-6  
cont

I102-7





I102-7  
cont

**Recommended Actions:**

- Please update the UC Plan D-EIR, Biological Resources Report to accurately reflect the differences between urbanized lands and sensitive habitat.
- Gross inaccuracy at this level calls into question the accuracy of the Biological Resources Report as a whole.
- These inaccuracies make it difficult to trust the document’s ability to inform decision makers about the foreseeable environmental impacts of the plan, in particular the protection of sensitive habitat.

**3) Canyon Adjacent Development**

MHPA General Management Guidelines govern the City’s management of its MHPA/MSCP lands. Priority 1 guidelines are required to be implemented.

Priority 1 guidelines include Adjacency Management actions

*“That require the city to prevent “illegal intrusions into the MHPA” and also to “Install barriers (e.g., fencing, rocks/boulders, vegetation) and/or signage where necessary to direct public access to appropriate locations.”*

I102-8

Unfortunately, these required actions are contradicted by the plan language describing “Context Sensitive Design Near Open Space” (D-UCP, p 56) and proposed Canyon Adjacent Development policy 2.9 C (p 169).

The Draft University Community Plan states:

*Development with paseos, paths, terraces along the canyon edge has the opportunity to **provide public access** and views points to open space. (D-UCP p 56).*

I102-8

**Recommended action:**

The D-UCPlan and D-EIR should **explicitly recognize** that **public access** to MHPA areas from adjacent private property violates the City’s commitment to the MSCP.

- Again on p. 169, Policy 2.9 C of the Draft-UCPlan states:

*C. Where possible and permitted by governing codes and regulations, developments that are **adjacent to natural open space should provide multi-use trails** for hiking, bicycling, jogging, and other uses **so that residents can access and appreciate the open space.***

I102-9

**Recommended action:**

The D-UCPlan and D-EIR should **explicitly** recognize that **public access** to MHPA areas from adjacent private property violates the City’s commitment to the MSCP. This language belongs in the text on p. 56 and in Policy 2.9C on p. 169.

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] D-EIR UCPlan Comments on Biological Resources Report, part 2 A Wiese  
**Date:** Tuesday, April 30, 2024 9:32:14 AM  
**Attachments:** [D-UCP - DEIR Comments AWiese pt 2 4-29-24.docx](#)

---

**From:** Andrew Wiese <[awiese@sdsu.edu](mailto:awiese@sdsu.edu)>  
**Sent:** Monday, April 29, 2024 11:12 PM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** Chris Nielsen <[cn@adsc-xray.com](mailto:cn@adsc-xray.com)>  
**Subject:** [EXTERNAL] D-EIR UCPlan Comments on Biological Resources Report, part 2 A Wiese

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---

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**RE: Comments on D-EIR - Biological Resources Report, UC Plan Update – Draft Environmental Impact Report**

April 29, 2024

**To the City Planning Department, City of San Diego:**

Please incorporate the attached comments as you prepare revisions to the UC Plan and D-EIR. It is critical that the inadequacies in the Biological Resources Report prepared in support of the D-EIR be corrected to ensure that environmental impacts of the plan are recognized and can be fairly evaluated by public officials, department staff, and resource agencies.

I102-10

Thank you for your attention and for your work!

Best regards,

Andrew Wiese  
University City  
Chair, UC Plan Update-Subcommittee  
UCPG

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9485 Aero Drive, M.S. 413  
San Diego, CA 92123  
E-Mail: [planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)

**RE: Comments on D-EIR - Biological Resources Report, UC Plan Update – Draft Environmental Impact Report**

April 29, 2024

**To the City Planning Department, City of San Diego,**

Please incorporate these comments in revisions to the UC Plan and D-EIR. It is critical that the Biological Resources Report prepared in support of the D-EIR be updated and corrected to ensure that environmental impacts of the plan can be fairly evaluated by public officials and resource agencies.

I102-11

Thank you for your attention and for your work!

Best regards,

Andrew Wiese  
University City  
Chair, UC Plan Update Subcommittee, UCPG

**GENERAL COMMENTS:**

The Busby Biological Resources Report (BRR) states that:

“To inform the UCPU, this biological resources report provides a summary of the existing biological resources within the UCPA and assesses potential impacts to these biological resources that may occur through implementation of the UCPU at a program level of review. This analysis does not include site-specific surveys but outlines **the framework that future site-specific development would be required to follow** to demonstrate consistency with City plans, policies, and regulations relating to biological resources.”

I102-12

- Unfortunately, an informed review of the document reveals that the report is **missing numerous documented observations of sensitive species** in the UC Plan area. Many of these have been documented in previous biological surveys prepared for EIR’s for public agencies, as well as in citizen science applications such as Ebird and iNaturalist.

I102-13

- The report also reflects **a general unfamiliarity with the biological resources in Rose Canyon**, and in particular, it fails to adequately identify resources related to the **vernal pool complex on Nobel Hill south of Nobel Drive**.

I102-14

- Moreover, **Figures 6 and 7a and 7b** of the report **include significant errors**, identifying urbanized parts of the University Community as undeveloped canyons or sensitive habitat (see Wiese, D-EIR UC Plan Comments pt 1, 4-26-24).

I102-15

These oversights call into question the reliability of the report as a whole, and they have direct implications for the assessment of plan impacts to natural resources, including not just *site specific* future proposals for trails, overlooks, mobility elements (such as aerial skyway), canyon adjacent development, and other elements of the plan but the **“framework that future site-specific development would be required to follow”** and in which future site surveys might take place.

I102-16

The D-EIR, Biological Resources Report notes that the document represents:

*“a broad-scale analysis of biological resources within the UCPA.” (BRR, p. 33)*

Unfortunately, these errors indicate that the BRR does not meet even this *minimal* standard.

I102-17

**Please correct these errors in the Final EIR and UC Plan.**

#### **SPECIFIC RECOMMENDATIONS:**

##### **1) Please complete a new and updated biological survey.**

The Final UCPlan and Final EIR should include a new and updated biological survey of the University Community, including accurate habitat surveys, and a thorough review of existing Biological Reports from Approved EIRs, Integrated Natural Resource Management Plans, as well as confirmed research grade observations in public platforms such as Ebird and iNaturalist. See below.

I102-18

##### **2) Please update Figures 6 and 7a-b** to update habitat maps and vegetation types.

In particular, update habitat reported for the finger canyons at the **east end of Rose Canyon Open Space Park** - west of I805, north of University Village Park and south of Rose Creek. This has been identified in previous EIRs to include significant **Scrub Oak Chaparral (Tier I)**, and a significant assemblage of Nuttall’s scrub oak; however, it is shown in the BRR as chaparral, a **Tier III habitat type**. The area also includes unrecognized areas with Wart Stemmed Ceanothus and Summer Holly. See, for example, **Biotechnical Report for Elvira to Morena Double Track Project, 2014 and Addendum, 2015**, SANDAG.

I102-19

This broad scale analysis (inaccurate in the absence of direct observation and surveys of habitat and sensitive species) in this area does not permit accurate evaluation of impacts of the proposed UC Plan, including **proposed connectivity infrastructure** in this area.

I102-20

Please review and **update habitat designations for Rose Creek/Rose Canyon**: 62400 Southern Sycamore Alder Riparian Woodland through the bottom of Rose Creek/Rose Canyon appears

I102-21

erroneous. There are no current observations for Alder (*Alnus rhombifolia*) in this location. Habitat designations such as 62100, Sycamore alluvial woodland and 63320, Southern Willow Scrub appear in other EIRs to describe this habitat area.

I102-21  
cont

### 3) Planned Parks Point Deficit – the UC Plan fails to meet the city’s published recreational value standard.

In section 2.3.7 City of San Diego Parks Master Plan, the Biological Resources Report notes:

“Adopted August 2021, the City Parks Master Plan identifies policies, actions, and partnerships for planning parks, recreation facilities, and programs that create a citywide network of recreational experiences. The plan identifies existing gaps to guide future park development and promotes equity throughout the City.” P. 31

I102-22

Unfortunately, the Draft UCPlan identifies an existing and future “parks points” / recreational value deficit in the Draft University Community Plan.

The D-UCPlan *does not meet* the City’s Recreational Value Standard established in the *Parks Master Plan*.

The D-UCP also **does not meet its stated goal** to:

*“Increase recreational value by keeping pace with population growth through additional investments in existing parks, acquisition of additional available land for parks, and the additional new parks and public spaces as part of new private development projects.” (D-UCPlan, p121)*

Based on staff corrections to the D-UCP announced at the UCPG meeting, April 9, 2024, the planned deficit in recreational value is projected to be ~ **4,100 points at build out, which represents park facilities for ~ 41,000 people**

The published (uncorrected) deficit in the Draft UCP is **5,592 points**, park facilities absent for approximately **56,000 people**. (Table 7, p 213).

The projected “park points” deficit is a red flag that the Draft-UCP land use scenario is **overbuilt**.

Although significant efforts to maximize recreational values have been made by planning staff since the first draft of the Parks and Recreation element was released in May, 2022 (thank you, planners), the deficit has not been closed.

The **planned recreational value deficit is an internal indication** that the **city cannot meet its infrastructure obligations** for the growth proposed in the Draft-UCP – much less in the high-density alternative considered in the D-EIR.

I102-23

The Biological Resources Report of the D-EIR states that the Parks Master Plan Recreational Value Standard is “an outcome-based measure.” (BRR, p 32)

I102-24

The outcome of the current plan is a deficit in facilities for tens of thousands of people over the coming decades.

I102-24  
cont

The UC Plan and Final EIR should provide a plan for parks and recreational value that can be met for this diverse and growing community.

**In light of these facts, the city should make the following specific revisions to the UC Plan and Final EIR:**

- The Final EIR should carefully evaluate the University Community Planning Group Supported Land Use Scenario (see Discussion Draft, Appendix) as an alternative.
- The Final UCPlan and Final EIR re-scale our the proposed land use scenario so that it can be serviced with the park and recreation infrastructure promised in the city's 2021 Parks Master Plan.
- The Final UC Plan should include more robust requirements for park space scaled to the size of residential and mix use developments.
- The Final UC Plan should develop a stronger Funding and Implementation Mechanism for Parks and Recreational Facilities to ensure that the city can provide this critical infrastructure to all of its communities.

I102-25

**4) Please update Tables 3-6 based on a more comprehensive set of existing databases.**

\* Please include in the review for the Final EIR **1) recent project EIR's** (see specific titles listed below), and **2) the US MCAS Miramar Integrated Natural Resources Management Plan, 2018.**

The Miramar INRMP is especially important to include in the review for the Final EIR, as it includes numerous rare species that *have a likelihood of occurring in the UC Plan Area* because of 1) the direct wildlife connections, 2) shared habitat and land formations, and 3) close proximity between the UC Plan Area and MCAS Miramar.

The D-EIR also notes that it excluded observations on citizen science platforms such as iNaturalist because they may be unreliable (BRR, p 33).

Oddly, on page 35, section 3.4, and p. 74, section 4.3.3, the Busby Biological Resources Report refers to iNaturalist as a "*reputable*" biological data source. iNaturalist observations *were included* in the review for sensitive wildlife species.

I102-26

\* **The Final D-EIR should review iNaturalist for plants as well as animals:** in San Diego, plant observations in particular are curated by both City of San Diego biological staff and Curatorial staff at the San Diego Museum of Natural History (which maintains the SD County Plant Atlas). They are "reputable" in the same way as the observations of wildlife.



\* **There is no justification for including iNaturalist data for wildlife and not for plants in the University Community.**

\* **Please review and update the list of sensitive species in the Final EIR in reference to research grade information available on iNaturalist.**

I102-26  
cont

Based on **my own review** of the sources listed above, I note that the *Biological Resources Report of the D-EIR is deficient* in providing information to decision makers about the location or potential to occur in the University Community for **the following sensitive species:**

### **Sensitive Plant Species.**

p. 59 – **Orcutt’s Brodiaea** – **update locations to include Nobel Drive vernal pool complex.** Numerous city surveys and management regimen have noted and focused on this species in the X-5 pools.

I102-27

p. 62 – **Summer Holly** – update locations to include the well-known population of twenty or so individual trees which exist in the slot canyon west of I-805, between University Village Park and Nobel Drive, in the vicinity of the trail proposed for connectivity in that canyon.

I102-28

Summer Holly may also be found on the east side of I-805 south of Rose Creek adjacent to the Miramar Nursery, and in many places in Soledad Canyon on the west side of the RR tracks north of Miramar Rd, where SANDAG double tracking is planned. The **double tracking EIR** notes them. These populations have been noted in EIRs for Pure water, and I-805 widening. Please review **Initial Study with Proposed Mitigated Negative Declaration/ Environmental Assessment, I-805 Managed Lanes Project, CALTrans, Feb., 2010, figure 19B.**

p. 70 – Spreading Navarretia – **Please update/correct location** to include **Nobel Drive vernal pool complex.** See the USFWS Critical habitat for this species, which is on Nobel Hill (Rose Canyon OSP) along **Nobel Drive** (see Figure 8).

I102-29

**Please add additional missing rare or sensitive species with California Native Plant Society rare plant rankings 2-4. These include:**

Pentachaeta aurea, aurea (CA rare plant rank...), Ashy Spike Moss (CA rare plant rank 4.1), Palmer’s Sagewort, California Adder’s Tongue, Western Ponysfoot, Palmer’s Grappling Hook, Ashy Spike Moss, California Boxthorn, Southwestern Spiny Rush, Graceful Tarplant (CA rare plant rank 4.2) and San Diego Viguiera (CA rare plant rank 4.3), These species all appear locally in Rose Canyon OSP and other parts of the UCP Area. All but boxthorn and grappling hook grow on **Nobel Hill/Rose Canyon OSP, where trail and bike infrastructure is planned.**

I102-30

The absence of these and other sensitive species from consideration inhibits the ability of planners, public officials, and wildlife agencies to accurately assess the environmental impacts of the UC Plan. These and other CNPS/California Rare Plant listed species (through list 4) should be included in the Biological Report in the Revised Draft of the UCP.

I102-31



**Sensitive Animal Species:**

The Final EIR **should review and correct or add information on the following animal species:**

p. 74 – Quino Checkerspot Butterfly – recommend specific survey for Quino on Nobel Hill – Rose Canyon OSP and on city of San Diego Pueblo lands east of I-805. These areas include large sections with Quino larval and secondary host plants: dot seed plantain, also owl’s clover. **See also MCAS-Miramar INRMP, 2018.**

I102-32

p. 75 – Southwestern Pond Turtle –**Reconsider as “potential.”** Exists on MCAS-Miramar. **See INRMP, 2018.**

I102-33

p. 76 – Southwestern Willow Flycatcher – update to **Potential/Low potential.** Rose Canyon OSP includes suitable willow riparian habitat and observations of *Willow* Flycatcher. **Potential for SWFI is noted in recent biological surveys.** See for example, **Leopold Biological Survey, City of San Diego Rose Canyon Trunk Sewer Joint Repair Project No. B-11025, San Diego, California, 2018; See also MCAS-Miramar INRMP, 2018.**

I102-34

p. 76– Least Bell’s Vireo – Update information to **Present.** This bird has been seen in Rose Canyon OSP and in Rose Canyon east of I-805. Review for example, **Leopold Biological Survey, City of San Diego Rose Canyon Trunk Sewer Joint Repair Project No. B-11025, San Diego, California, 2018; Initial Study with Proposed Mitigated Negative Declaration/ Environmental Assessment, I-805 Managed Lanes Project, CALTrans, Feb., 2010, figure 19B. See also MCAS-Miramar INRMP, 2018; Rose Creek Watershed Trail Connections Project, Focused Sensitive Species Surveys, Cadre Environmental, 2013.**

I102-35

p. 80 – San Diego Fairy Shrimp – **Update locational info** to include **Nobel Drive** vernal pool complex on Nobel Hill in Rose Canyon Open Space Park.

I102-36

p. 81 Western Spadefoot Toad - update/correct locations to include **Nobel Drive** vernal pool complex on Nobel Hill in Rose Canyon Open Space Park. This species is regularly observed here, also at Pueblo Lands south, east of I-805.

I102-37

p. 82 – Belding’s Orange Throated Whiptail – update locational information to include **Nobel Drive** vernal pool complex on Nobel Hill in Rose Canyon Open Space Park. See for example, specific observations in **Initial Study with Proposed Mitigated Negative Declaration/ Environmental Assessment, I-805 Managed Lanes Project, CALTrans, Feb., 2010, figure 19B.** This species is also present in Roselle Canyon and the Sorrento Valley slopes on the open space lands proposed for dedication at the north end of Towne Centre and Campus Point Drives – other locations where new trails or bike infrastructure are proposed. **See also MCAS-Miramar INRMP, 2018.**

I102-38

p. 86 – Loggerhead Shrike – **Update information to Present.** See for example **Torrey Pines docent society bird surveys.** <https://torreypine.org/nature-center/birds/birdsurveys/> See also **MCAS-Miramar INRMP, 2018.**

I102-39

## 5) Wildlife Corridors

Please Update discussion of wildlife corridors (p 93-95).

The Biological Resources Report states that:

*“There are no designated wildlife corridors within the University Community Plan area. However, there are core biological resource areas that connect wildlife from inland to the coast as described further in this section.” (p 93-94)*

I102-40

The first statement would appear to be erroneous, as the MSCP map of habitat cores and corridors (City of San Diego, 1997) includes a habitat corridor connecting Rose Canyon-MCAS Miramar with Sorrento Valley across Miramar Mesa and including Soledad Canyon. These corridors were recently mapped in the EIR for the San Diego Pure Water Project.

Confirmed observations of Southern Mule Deer in iNaturalist (below) reveal the functionality and fragility of this critical north-south wildlife corridor between the two large habitat cores in North City San Diego.

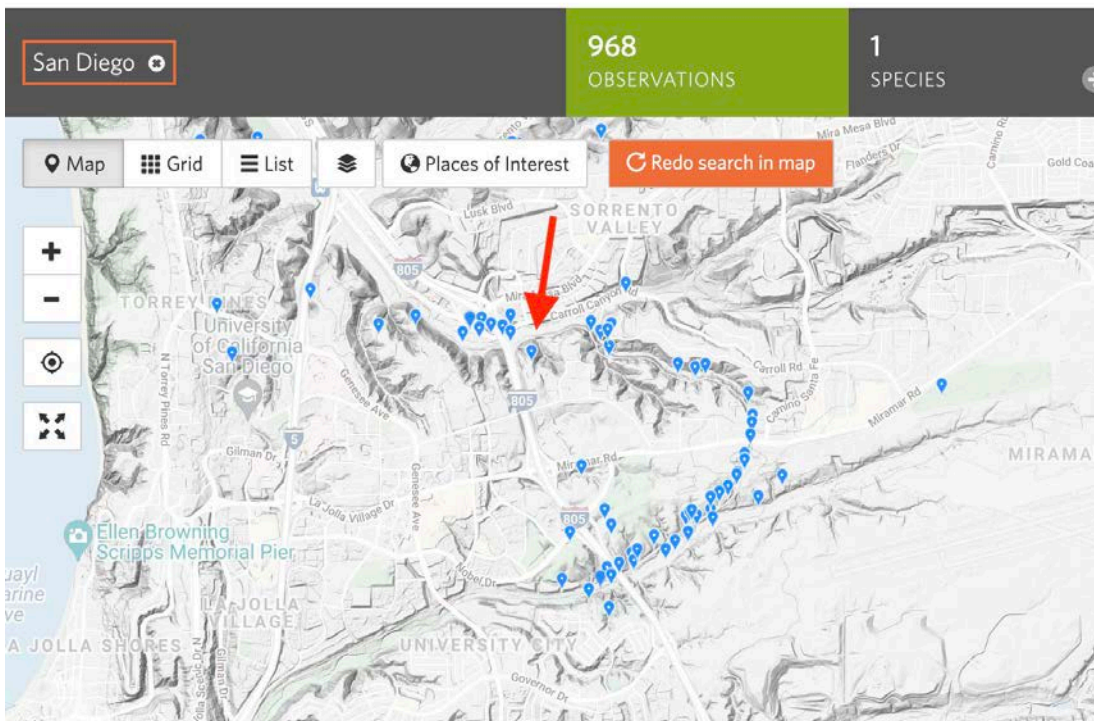
See **North City Pure Water Program, Environmental Impact Report, 2018;**  
See also **iNaturalist – Southern Mule Deer (accessed June 30, 2023) (below).**

**Please update/correct the Final EIR to accurately locate the critical wildlife corridors** connecting core habitat in the UC Plan Area including MSCAS- Miramar/Rose Creek Watershed with Peñasquitos Watershed via Soledad Canyon, Carroll Creek and City of San Diego Pueblo Lands east of I-805.

I102-41

# Observations

Southern Mule Deer



I102-41  
cont

**6) Incorporate data in the MCAS-Miramar Integrated Natural Resources Management Plan**, among the databases consulted for sensitive species in or within 1 mile of UC Plan Area. Natural resources present on the MCAS provide appropriate context for what may be present or potential in UC.

The INRMP also **reveals the significance of the fragile Wildlife Corridor connections** to both Rose Canyon and San Clemente Canyons as well as to the Peñasquitos watershed via Soledad Canyon and City of San Diego Pueblo Lands. The richness of species diversity on MCAS Miramar points to **the need for special protection for the connecting lands** (for example through open space dedication on *both* sides of I-805) and also **the need for specific language and policy in the UC Plan to reinforce existing connections and create new ones** through intentional crossing structures and other interventions.

I102-42

The presence of these species on MCAS Miramar also illustrates the **potential for habitat restoration in the UC Plan Area to add appropriate habitat** and attract these species to new territories in UC. It supports the addition of language to that effect throughout the UC Plan Draft.

For reference the Executive Summary of the INRMP, 2018 includes the following statement:

*“Federally listed species found on MCAS Miramar include the threatened coastal California gnatcatcher (Polioptila californica californica), endangered least Bell’s vireo (Vireo bellii pusillus), endangered*

*Quino checkerspot butterfly (Euphydryas editha quino), federally proposed Hermes copper butterfly (Hermelycaena [Lycaena] hermes), endangered Del Mar manzanita (Arctostaphylos glandulosa ssp. crassifolia), endangered willow monardella (Monardella viminea, Elvin and Sanders 2003; Monardella linoides ssp. viminea, Abrams 1951), and six species associated with vernal pool habitat, such as the San Diego mesa mint (Pogogyne abramsii) and San Diego fairy shrimp (Branchinecta sandiegonensis). Species of Regional Special Concern (including species at risk of listing) at the Station include former candidates for federal listing as threatened or endangered, species of concern to the State of California, and species that are regionally rare or of limited distribution.*” (MCAS Miramar, INRMP, 2018, ES-4)

I102-42  
cont

Other species of concern listed as not present in the UC Plan area but occurring at MCAS Miramar include Western Pond Turtle, Red Diamondback Rattlesnake, Southwestern Willow Flycatcher, Western Burrowing Owl, Coastal Cactus Wren, Yellow Warbler, Tricolored Blackbird, Black tailed Jackrabbit, Pocket Free Tailed Bat, Silvery Legless Lizard, and a variety of others. (See INRMP, 2018, Table 4.7).

I102-43

Source: [https://www.miramars.marines.mil/Portals/60/Docs/MEMS/Nat\\_Res/INRMP%202018%20Final/E-Chapter%204%20-%20Biological%20Resources.pdf?ver=2018-08-24-153903-850](https://www.miramars.marines.mil/Portals/60/Docs/MEMS/Nat_Res/INRMP%202018%20Final/E-Chapter%204%20-%20Biological%20Resources.pdf?ver=2018-08-24-153903-850)

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] UCPlan Draft EIR - Comments on Biological Resources Report - wiese- pt 1  
**Date:** Tuesday, April 30, 2024 9:32:33 AM  
**Attachments:** [D-EIR UCPlan Comments AWiese 4-26-24 pt 1.docx](#)

---

**From:** Andrew Wiese <[awiese@sdsu.edu](mailto:awiese@sdsu.edu)>  
**Sent:** Monday, April 29, 2024 11:12 PM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Cc:** Chris Nielsen <[cn@adsc-xray.com](mailto:cn@adsc-xray.com)>  
**Subject:** [EXTERNAL] UCPlan Draft EIR - Comments on Biological Resources Report - wiese- pt 1

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---

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**RE: Comments on D-EIR - Biological Resources Report, UC Plan Update – Draft Environmental Impact Report**

April 29, 2024

**To the City Planning Department, City of San Diego,**

Please accept the following comments on the Draft EIR and Biological Resources Report – University Community Plan.

Sincerely,

Andrew Wiese  
University City  
Chair, University Community Plan Update Subcommittee, UCPG

**I102-44**

**I102: Response to Andrew Wiese Comment Letter**

**I102-1:** This comment is an introduction to the letter; no response is required.

**I102-2:** This comment is an introduction to the letter; no response is required.

**I102-3:** This comment is an introduction to the letter; no response is required.

**I102-4:** Comment noted, as requested, Figures 4 and 5 of the Biological Resources Report have been updated to reflect the corrected boundaries of the open space to be dedicated pursuant to Charter 55.

**I102-5:** The acreages of open space to be dedicated pursuant to Charter 55 has been updated in both the Biology Report and Final Program Environmental Impact Report (PEIR). The additional areas added totaled approximately 2.98 acres. The total acreage of open space added pursuant to Charter 55 was reviewed and updated to reflect the addition of approximately 166 acres. The acreage has been updated in the Biological Resources Report and PEIR project description.

**I102-6:** The comment indicates there are areas of urbanized land mapped as open space/canyons in the biology report. The data used to create these community-wide maps are based on regional data and is not intended to be parcel specific. The environmental analysis was appropriately conducted at a program level and a more refined (project level) evaluation of resources is not necessary to disclose the potential impacts of the project at the program level. At the time future development is proposed, the City would require a project level biological survey and biological analysis consistent with the City's Biology Guidelines for any site that contains environmentally sensitive lands. No revisions to the Biology Report were made. See also response to comment I102-13.

**I102-7:** Refer to response to comments I102-6 and I102-13.

**I102-8:** Comment noted. Trails are a conditionally compatible use within the City's Multi-Habitat Planning Area (MHPA). The referenced language from the University Community Plan Update (CPU) regarding development along canyon edges does not override or replace any obligations under the City's Multiple Species Conservation Program (MSCP) Subarea Plan. Future access to the MHPA would be reviewed and required to be consistent with the MSCP Subarea Plan and MHPA Land Use Adjacency Guidelines.

**I102-9:** Refer to response to comment I102-8.

**I102-10:** This comment is an introduction to the letter; no response is required.

**I102-11:** This comment is an introduction to the letter; no response is required.

**I102-12:** Comment noted.

**I102-13:** The Biological Resources Report was prepared to support a program-level evaluation of potential impacts. As a result, data is reported based on regional data sources for sensitive species and vegetation. Individual observations from every citizen science database are not captured. While the report acknowledges that anecdotal and citizen science data can provide additional information

on biological resources throughout the region, the quality and reliability of this data is often inconsistent and not verified by a qualified biologist pursuant to the City's Biology Guidelines. Therefore, the assessments for the potential occurrence of sensitive wildlife species were based on known ranges (geographic and elevational), habitat preferences for the species, historical species occurrence records, and data from several recent biological resources reports conducted for private development projects. In addition, for species with limited available data from the above databases, information from other reputable biological data sources (e.g., Center for Biological Diversity, and Xerces Society for Invertebrate Conservation) were used to obtain species specific information. iNaturalist data was also referred to and data included in the analysis was confirmed by a City-approved consultant biologist.

As detailed in the Biological Resources Report Section 3.1, the literature review and database searches included reliable, peer-reviewed databases including:

- San Diego Geographic Information Source (SanGIS) Vegetation Information in the San Diego Region (County 2020)
- SanGIS Plant and Wildlife Information in the San Diego Region (County 2023)
- CDFW California Natural Diversity Database (CNDDDB; CDFW 2023a)
- California Native Plant Society (CNPS) Inventory of Rare and Endangered Plants (CNPS 2023)
- Calflora: information on wild California plants (Calflora 2023)
- USFWS historical species database (USFWS 2023a)
- USFWS critical habitat database (USFWS 2023b)
- County of San Diego Multiple Species Conservation Program (MSCP; County 1992)
- City of San Diego MSCP Subarea Plan (City 1997)
- U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Soil Survey Geographic Database (USDA NRCS 2020)
- USFWS National Wetlands Inventory (USFWS 2023c)
- San Diego County Plant Atlas (San Diego Natural History Museum [SDNHM] 2023)
- San Diego County Bird Atlas (Unitt 2004)
- San Diego County Mammal Atlas (Tremor et al. 2017)
- City of San Diego Vernal Pool Habitat Conservation Plan (City 2019)

**I102-14:** Vernal pool resources are depicted on Figures 7a and 7b of the Biological Resources Report, including complexes south of Nobel Drive.

**I102-15:** Refer to response to comments I102-6 and I102-13.

**I102-16:** Comment noted. The analysis is intended to be program-level. Data provided is sufficient to characterize the typical species and vegetation communities and land cover types present in the University CPU area. As future development proposed on land adjacent to or containing ESL and/or MHPA, the City would require a site-specific biological analysis to be prepared in accordance with the City's Biology Guidelines in order to verify existing conditions, vegetation communities, and species present.

**I102-17:** Comment noted. Refer to response to comments I102-6, I102-13, and I102-16.

**I102-18:** Comment noted. Refer to response to comments I102-6, I102-13, and I102-16.

**I102-19:** Comment noted. Refer to response to comments I102-6, I102-13, and I102-16.

**I102-20:** Comment noted. Refer to response to comments I102-6, I102-13, and I102-16. Future infrastructure with the potential to affect ESL would require site specific biological surveys and evaluation.

**I102-21:** Comment noted. Refer to response to comments I102-6, I102-13, and I102-16.

**I102-22:** Comment noted. Updates to the referenced park points have been incorporated into the Final PEIR in Section 4.13.1.1.c. The comment does not raise an issue related to adequacy of the Draft PEIR.

**I102-23:** Comment noted. The comment does not raise an issue related to the adequacy of the Draft PEIR.

**I102-24:** Comment noted. The comment does not raise an issue related to the adequacy of the Draft PEIR.

**I102-25:** Comment noted. Revisions to the Final PEIR were incorporated to clarify the scope of the Reduced Density Alternative, which reflects and analyzes the University Community Planning Group supported land use scenario as a project alternative. The Draft PEIR "Blueprint SD Initiative Reduced Density Alternative" was renamed in the Final PEIR to the "Reduced Density Alternative". The description of this alternative was revised and clarified in Section 8.4.1 to identify the specific density reductions within the University CPU and Hillcrest FPA. Impacts related to recreation are discussed in Section 4.13 of the PEIR.

**I102-26:** Tables 3 through 6 of the Biological Resources Report identify species with a potential to occur within the University CPU area. The City recognizes there are numerous data sources available that identify sensitive species occurrences. For this program-level document recognized databases were consulted and additional data sources were evaluated to expand on the list of species with a potential to occur. To clarify, iNaturalist observations were not used as part of the overall literature and database review; however, where certain species were known to be present but not reported in CNDDDB or SanBIOS database, occurrences from iNaturalist were reviewed to support the addition of species with a potential to occur. As detailed in Section 3.3 and 3.4 of the Biological Resources Report, iNaturalist data was reviewed by City-approved qualified biologist pursuant to the City's Biology Guidelines and considered in the evaluation of potential species occurrences. Refer also to response to comments I102-6, I102-13, and I102-16. Tables 3 through 6 do not require updating due to the program-level of analysis and the fact that future development would require site specific surveys to verify presence or absence of sensitive species.

**I102-27:** The City appreciates these comments but notes that the level of detailed corrections being requested do not affect the adequacy of the Draft PEIR. Prior to any future development on or adjacent to ESL, site specific biological surveys would be required to verify the presence of resources. Refer also to response to comments I102-6, I102-13, and I102-16.



**I102-28:** Refer to response I102-27.

**I102-29:** Refer to response I102-14 and I102-27.

**I102-30:** Refer to response I102-27.

**I102-31:** Refer to response I102-27.

**I102-32:** Refer to response I102-27.

**I102-33:** Refer to response I102-27.

**I102-34:** Refer to response I102-27.

**I102-35:** Refer to response I102-27.

**I102-36:** Refer to response I102-14 and I102-27.

**I102-37:** Refer to response I102-14 and I102-27.

**I102-38:** Refer to response I102-14 and I102-27.

**I102-39:** Refer to response I102-27.

**I102-40:** The evaluation of wildlife corridors is based on information in the MSCP Final Plan. As detailed in Section 4.5 of the Biology Report, "Based on a review of the MSCP Subarea Plan, the canyon networks within the UCPA are local wildlife movement corridors that support regional wildlife corridors including Los Peñasquitos Lagoon, Los Peñasquitos Canyon, and Lopez Canyon located immediately adjacent to the UCPA to the northwest (see Figure 6). The local canyon networks within the UCPA are important to maintain healthy plant and wildlife populations in the highly urbanized UCPA by providing connectivity from the coast to natural areas further east which serve as regional wildlife corridors in the MSCP Subarea Plan."

**I102-41:** Refer to response I102-40. The Biology Report Section 4.3.3 identifies southern mule deer as a species reported within or within a 1-mile buffer of the University CPU area; therefore, no revisions are needed.

**I102-42:** Comment noted. Refer to response to comment I102-13.

**I102-43:** Refer to response to comment I102-13.

**I102-44:** Comment noted.

## Comment Letter I103 - Gerald and Paulette Williams

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update Draft EIR  
**Date:** Thursday, April 25, 2024 8:12:27 AM

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**From:** Paulette92122 <paulette.williams@gmail.com>  
**Sent:** Wednesday, April 24, 2024 8:12 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; University City Peeps <universitycitypeeps@gmail.com>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update Draft EIR

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

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Below are our comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I103-1

I103-2

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I103-3

III. School Requirements from the San Diego School District Must Be Met. The

I103-4

DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

I103-4  
cont.

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

I103-5

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I103-6

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally, it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I103-7

I103-8

Sincerely,  
Gerald & Paulette Williams

**I103: Responses to Gerald and Paulette Williams Comment Letter**

**I103-1:** See response to comment O13-1 under comment letter O13.

**I103-2:** See response to comment O13-2 under comment letter O13.

**I103-3:** See response to comment O13-3 under comment letter O13.

**I103-4:** See response to comment O13-4 under comment letter O13.

**I103-5:** See response to comment O13-5 under comment letter O13.

**I103-6:** See response to comment O13-6 under comment letter O13.

**I103-7:** See response to comment O13-7 under comment letter O13.

**I103-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I104 - Alex Wong

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Hillcrest Focused Plan Amendment  
**Date:** Tuesday, April 30, 2024 9:16:35 AM

---

**From:** Alex Wong <[alex@ridesd.org](mailto:alex@ridesd.org)>  
**Sent:** Monday, April 29, 2024 9:47 AM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Subject:** [EXTERNAL] Hillcrest Focused Plan Amendment

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Dear City Planning Department,

I strongly support the recommendations put forth by RideSD, in particular completing the bus lanes between Upas Street and University Avenue. This is crucial to make the Rapid 215, one of the busiest bus lines in the County, to be truly rapid, first-class transit for those who cannot, or do not want to, drive. I also highly recommend planning for bus lanes on 4th and 5th Avenues. Downtown, Bankers Hill, and Hillcrest are all developing into a continuous corridor of density, and need faster buses.

I104-1

I also urge the planning department, in conjunction with Hillcrest's Community Planning Group and SANDAG, to accelerate planning and construction of an aerial gondola connecting UCSD Hillcrest with Fashion Valley. This will connect the County's largest hospital with the County's largest mall and vastly improve Trolley access for Hillcrest residents. San Diego ought to emulate the transit successes of La Paz and Medellin, where gondolas come every 15 seconds and fly nonstop, as the crow flies, and are far faster than driving.

I104-2

Sincerely,

--

Alex Wong  
RideSD Data Researcher

*"Frequency is Freedom, but [every] 15 minutes isn't frequency" - Alon Levy*

**I104: Response to Alex Wong Comment Letter**

**I104-1:** Comment noted. The comment recommends improving bus lanes and frequency, which is outside of the scope of the project. This comment does not raise an issue related to the adequacy of the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I104-2:** Comment noted. The comment recommends creating an aerial gondola to increase connections to transit between Hillcrest and Mission Valley. Policy MO-3.13 in the Hillcrest Focused Plan Amendment calls on the City to coordinate with the San Diego Association of Governments and the San Diego Metropolitan Transit System on the feasibility of an aerial skyway connecting Hillcrest and Mission Valley. This comment does not raise an issue related to the adequacy of the Draft PEIR. No further response is required.

## Comment Letter I105 - Rebecca Robinson Wood

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University Community Plan  
**Date:** Tuesday, April 30, 2024 9:33:53 AM

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**From:** Rebecca Robinson Wood <rsrobinsonco@gmail.com>  
**Sent:** Tuesday, April 30, 2024 12:00 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Subject:** [EXTERNAL] University Community Plan

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Edit recommendations for the March 15, 2024 Draft University Community Plan

COMMENTS ON THE DRAFT UNIVERSITY COMMUNITY PLAN March 15, 2024

The current University Community Plan, 1987 (2017) University Community Plan, adopted December 5, 2016 by the City Council of San Diego, California, Resolution R-310914 became effective 02-03-17.

This 2017 UCP included a significant number of proposals that were not put into affect over the past 37 years and we believe these should remain as proposals until such time as the city follows through with promises that were made in the 1971 University Community Plan, over 53 years ago.

<p>Introduction Page 7, Paragraph 4, Last Sentence</p> <p>Please correct the following, <b>add</b> and <b>delete</b>. This area is also home to <del>two</del> <b>eight</b> major medical centers along with ... .</p>	<p>The community is home to Eight major medical centers including, the Veterans Administration Hospital, Thornton Medical Center, Scripps Medical Center, Conrad Prebys Cardiovascular Institute, Jacobs Medical Center, Thornton Medical Center, Moores Cancer Center, and Scripps Memorial Green Hospital, many of which are part of UC San Diego Health.</p>	I105-1
<p>Introduction Page 16, Column 2 Building from 1987 (2017) Community Plan</p> <p>Please correct the following, <b>add</b> and <b>delete</b>. "As of 2020, the 1987 (2017) Community Plan <del>did not contain any capacity for</del> <b>contained 70 additional residential home capacity per current UCP Table 7, with 28,064 total proposed homes minus 27,994 existing homes (SANDAG Series14 forecast year 2020 with 652 home capacity), adjusted upward for the 566</b></p>	<p>We believe the city is in error to have removed the entitled homes from the plan. Transfer of development rights is permissible in subdivisions per the current UCP language of the Development Intensity Element of the 1987 (2017) UCP. And further documented in the in the current plan Amendments.. The current UCP identifies 7.5 percent as UC fair share allocation of affordable housing inventory in the City.</p>	

<p>homes identified in current UCP, HOUSING/RESIDENTIAL ELEMENT, IV. Proposals,. E. 1. A majority of the 1987 Community Plan’s 31.7 ....</p>	<p>The 1987 (2017) UCP Table 7 Proposed Residential Density/Units/Population identifies 28,064 du proposed in the community. This compares to the more recent Water Supply Assessment (WSA) for the University Community (UC) Plan Update (IO # 21004253), prepared by the Civil, Public Utilities Department, dated July 14, 2023, documents “according to the Series 14 forecast, SANDAG estimated the UC had 27,994 existing homes in the year 2020, which leaves a capacity of 652 homes.”</p>
<p>Page 9, Column 1, Paragraph 2</p>	<p>Torrey Pines is a public park</p>
<p>Page 9, Column 1, Paragraph 2 Rose Canyon ...is home to regionally <del>unique</del> <del>common</del> habitats and species such as coastal sage scrub (264,000 acres county), chaparral (630,000 acres county), and oak woodlands (126,000 acres county).</p>	
<p>Page 11, Column 2, Paragraph 1, Sentence 2 With limited <del>vacant</del> <del>land available</del> developed for human occupation ...</p>	
<p>Figure 6, Page 50</p>	<p>An appropriate location for the Gateway with Multimodal path at Gilman Drive and Interstate 5 combined with the Coastal Rail Trail is recommended.</p> <p>Figure 6 in the draft update is on private property, steep, irregular, unsafe and not practical. And basically inaccessible given the relinquished access to I-5 from the properties.</p> <p>We encourage the relocation of this path to the Coastal Rail Trail proposed location on Gilman Drive.</p> <p>If Figure 6 is not be corrected to remove the path on the east side of Lot 2 Map 7174 we will find the city, its planning and mobility staff jointly and individually responsible, for any injury, damages, loss of life resulting from this poor multi-modal alignment choice. Please</p>

I105-2  
cont

I105-3

I105-4

I105-5

I105-6

I105-7

I105-8

I105-9



remove the trail depiction along the easterly Lot 2 Map 7174 Lot line with Lot 6 South Pointe TownHomes (Parcel C Parcel Map 1441).

The properties clearly posted No Trespassing Signs. These private properties sites are not open for public recreation nor for multi model transit. No one from the city has asked that the property owner to authorize a path in this location. No permission is given to trespass on Lot 2 Map 7174

I105-9  
cont

I105-10

Please email with any questions or to discuss.  
Thank You.

Rebecca Robinson Wood, Property Owner  
[rrobinsonco@gmail.com](mailto:rrobinsonco@gmail.com)

**I105: Responses to Rebecca Robinson Wood Comment Letter**

**I105-1:** Comments are noted. This letter pertains to the University Community Plan text and does not raise any issues regarding the adequacy of the Draft Program Environmental Impact Report (PEIR).

**I105-2:** Comment noted. This comment is informational and does not pertain to the adequacy of the Draft PEIR. While there are two major medical groups in the University Community Plan Update area, the University of California San Diego medical group and the Veterans Administration Hospital, the City acknowledges that there are a number of affiliated medical centers as noted in the comment.

**I105-3:** Comments are noted. This letter pertains to the University Community Plan text and does not raise any issues regarding the adequacy of the Draft PEIR.

**I105-4:** Comment noted. This letter pertains to the University Community Plan text and does not raise any issues regarding the adequacy of the Draft PEIR.

**I105-5:** Comment noted. This letter pertains to the University Community Plan text and does not raise any issues regarding the adequacy of the Draft PEIR.

**I105-6:** Comment noted. This letter pertains to the University Community Plan text and does not raise any issues regarding the adequacy of the Draft PEIR.

**I105-7:** Comment noted. This letter pertains to the University Community Plan text and does not raise any issues regarding the adequacy of the Draft PEIR.

**I105-8:** Comment noted. This letter pertains to the University Community Plan text and does not raise any issues regarding the adequacy of the Draft PEIR.

**I105-9:** Comment noted. This letter pertains to the University Community Plan text and does not raise any issues regarding the adequacy of the Draft PEIR.

**I105-10:** Comment noted. This letter pertains to the University Community Plan text and does not raise any issues regarding the adequacy of the Draft PEIR.

**I105-11:** Comment noted. This letter pertains to the University Community Plan text and does not raise any issues regarding the adequacy of the Draft PEIR.

## Comment Letter I106 - Milo Worsham

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: University Community Plan Update Draft EIR (DEIR)  
**Date:** Tuesday, April 30, 2024 9:26:52 AM

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**From:** Milo Worsham <milo@miloworsham.com>  
**Sent:** Monday, April 29, 2024 5:57 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>  
**Subject:** [EXTERNAL] University Community Plan Update Draft EIR (DEIR)

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To Whom It May Concern: Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

- I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park. I106-1
  
- II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant. I106-2
  
- III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within I106-3

the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.

I106-4  
cont.

IV. IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community's preferred alternative.

I106-5

V. V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I106-6

VI. VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts : The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.

I106-7

I106-8

Milo Worsham  
6254 Via Regla  
San Diego CA 92122  
858-449-0014

**I106: Responses to Milo Worsham Comment Letter**

**I106-1:** See response to comment O13-1 under comment letter O13.

**I106-2:** See response to comment O13-2 under comment letter O13.

**I106-3:** See response to comment O13-3 under comment letter O13.

**I106-4:** See response to comment O13-4 under comment letter O13.

**I106-5:** See response to comment O13-5 under comment letter O13.

**I106-6:** See response to comment O13-6 under comment letter O13.

**I106-7:** See response to comment O13-7 under comment letter O13.

**I106-8:** See response to comment O13-8 under comment letter O13.

## Comment Letter I107 - Susan Worsham

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: University Community Plan Update Draft EIR (DEIR)  
**Date:** Tuesday, April 30, 2024 9:26:08 AM

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**From:** susan@susanworsham.com <susan@susanworsham.com>  
**Sent:** Monday, April 29, 2024 5:49 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** universitycitypeeps@gmail.com; Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; milo@miloworsham.com  
**Subject:** [EXTERNAL] University Community Plan Update Draft EIR (DEIR)

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Below are my comments to the City of San Diego's University Community Plan Update Draft EIR (DEIR):

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- II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.
- III. School Requirements from the San Diego School District Must Be Met. The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14,

I107-1

I107-2

I107-3

I107-4

- 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.
- I107-4  
cont
- IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.
- I107-5
- V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.
- I107-6
- VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts : The City’s DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.
- I107-7
- I107-8

Susan Worsham  
6254 Via Regla, San Diego, CA 92122

**I107: Responses to Susan Worsham Comment Letter**

**I107-1:** See response to comment O13-1 under comment letter O13.

**I107-2:** See response to comment O13-2 under comment letter O13.

**I107-3:** See response to comment O13-3 under comment letter O13.

**I107-4:** See response to comment O13-4 under comment letter O13.

**I107-5:** See response to comment O13-5 under comment letter O13.

**I107-6:** See response to comment O13-6 under comment letter O13.

**I107-7:** See response to comment O13-7 under comment letter O13.

**I107-8:** See response to comment O13-8 under comment letter O13.



## Comment Letter I108 - Julie Wright

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] University City Community Plan Update Draft EIR  
**Date:** Tuesday, April 30, 2024 9:17:56 AM  
**Attachments:** [image001.png](#)

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**From:** Julie Meier Wright <juliemeierwright@gmail.com>  
**Sent:** Monday, April 29, 2024 10:16 AM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoelaCava@sandiego.gov>; University City Peeps <universitycitypeeps@gmail.com>  
**Subject:** [EXTERNAL] University City Community Plan Update Draft EIR

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In addition to fully endorsing the letter below, which I reviewed prior to its being sent to University City residents who are most affected by this DEIR, let me add some additional comments as a 27-year resident of University City.

I108-1

I fully support the need for density in San Diego, but the answer needs to be regional and impact fairly the region's 3.3-million citizens. It needs to be data-driven, not pie-in-the-sky wishful thinking. It should reflect a city and region that embraces planned density projects, not shoeorning buildings of inappropriate size into neighborhoods with no regard to the character of single-family neighborhoods, the loss of sunshine and privacy, the inattention to parking, and the inexcusable impact on public safety.

I108-2

Former mayor Jerry Sanders once told me that his biggest nightmare was an urban canyon wildfire. As a member of an advisory board for the WIFIRE program at UC San Diego, I have seen first-hand how dangerous canyon fires can be even though this plan includes homes in severe fire danger zones. Do you need a wildfire with loss of life to convince you that the plan you are trying to pass is grossly insufficient?

I108-3

You don't use transit in an emergency. And wishful thinking doesn't move people into transit. What does is a clean and safe transit system that is very convenient to residents, not a mile away — a transit system that gets people from home to jobs in not much more time than driving. We do not have that today, even in University City where some of the density planned isn't remotely close to transit. What "transit first" should mean is a working transit system before increased density with loss of parking and roadways.

I108-4

I love the current density in University City but I do not believe that this part of San Diego should play a disproportionate role in meeting the entire region's housing needs when the trolley, as just one example, has 62 stops where transit-oriented density can be planned and built. That — along with an effective shuttle system — has the potential to get people out of vehicles. It's clear that \$6/gal gas and sky-high parking costs — not providing grossly insufficient parking — have not done it. People drive because it is what works best for them and their families.

I108-5

I am completely frustrated by the lack of data-driven decision-making in the City of San Diego; wishful thinking about some desired utopia just makes voters angry. I am tired of driving on streets re-engineered to accommodate an entire traffic lane of bicycles only to see no bicycles while traffic is backed up. Do not do this to Governor Drive, with its already inadequate school and park capacity and heavy traffic burden today. An up-to-date traffic study of Governor Drive, Genesee Avenue and the rest of UC must be completed and, if the city really wants to be bold, reconsider the Regents Road Bridge — in the general plan since 1959 and blocked by a handful of residents who arrived after it was in the plan.

I108-6

I have worked on efforts to reform the California Environmental Quality Act, but this effort falls far short of what the legitimate purpose of CEQA intended. The draft EIR needs to be rejected until current studies are completed.

I108-7

I. No Changes Should Be Made to Governor Drive. Converting Governor Drive from a four-lane Major Arterial to a two-lane Major Arterial with continuous buffered bike lanes will have a significant adverse California Environmental Quality Act (CEQA) transportation impact, according to Vehicle Miles Traveled (VMT) results of the Draft Mobility Technical Report. The Draft Mobility Technical Report is also questionable because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. No changes to Governor Drive can be made without a current Traffic Analysis performed at peak hour traffic times, i.e. when parents are dropping off and picking up their children attending all three schools and when events are held at Standley Park.

I108-8

I108-9

II. Emergency Access to South UC Must Be Maintained. The DEIR states that, based on the existing roadway network in place, combined with the improvements required by the City as development occurs and mandated by the Fire Code, impacts related to ensure emergency access within the University CPU would be less than significant; however, this conclusion is unsupported by the evidence. As discussed above, the Community CPU proposes to reduce Governor Drive from four lanes to two. The DEIR does not provide analysis of emergency access with two less lanes on Governor Drive. Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I108-10

III. School Requirements from the San Diego School District Must Be Met. The DEIR states “No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. Notably, most of the school district’s memorandum was incorporated into the DEIR, but this statement was not.

I108-11

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. The DEIR should be revised to include the community’s preferred alternative.

I108-12

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City’s general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. The DEIR should be separated into three separate EIRs for each proposed plan update.

I108-13

**VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.**

I108-14

Sincerely,



Julie Meier Wright  
Public Affairs . Advocacy . Strategic Planning  
Strategic Advisor, Collaborative Economics  
Senior Fellow, US Council on Competitiveness  
Senior Fellow, California Council on Science & Technology  
NOTE: THIS ADDRESS IS INVALID AFTER 12/31/23. PLEASE CONTACT ME FOR AN UPDATED ADDRESS.  
8895 Towne Centre Drive, Suite 105 - #110, San Diego CA 92122  
C: 619 300 5800

**I108: Response to Julie Wright Comment Letter**

**I108-1:** Comment noted. No further response required.

**I108-2:** Comment noted. This comment does not raise any issues regarding the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response required.

**I108-3:** Comment noted. This comment does not raise any issues regarding the adequacy of the analysis in the Draft PEIR. No further response required.

**I108-4:** Comment noted. This comment does not raise any issues regarding the adequacy of the analysis in the Draft PEIR. No further response required.

**I108-5:** Comment noted. This comment does not raise any issues regarding the adequacy of the analysis in the Draft PEIR. No further response required.

**I108-6:** See response to comments O13-1 and O13-2 under comment letter O13.

**I108-7:** Comment noted. This comment does not raise any issues regarding the adequacy of the analysis in the Draft PEIR. No further response required.

**I108-8:** See response to comment O13-1 under comment letter O13.

**I108-9:** See response to comment O13-2 under comment letter O13.

**I108-10:** See response to comment O13-3 under comment letter O13.

**I108-11:** See response to comment O13-4 under comment letter O13.

**I108-12:** See response to comment O13-5 under comment letter O13.

**I108-13:** See response to comment O13-6 under comment letter O13.

**I108-14:** See response to comments O13-7 and O13-8 under comment letter O13.

## Comment Letter I109 - Xianjin Zhou

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: Housing Action Plan  
**Date:** Thursday, April 25, 2024 1:29:16 PM

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**From:** Zhou, Xianjin <xzhou@health.ucsd.edu>  
**Sent:** Thursday, April 25, 2024 1:19 PM  
**To:** CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; PLN\_PlanningCEQA <planningceqa@sandiego.gov>; ncausman@sandiego.gov; Lukes, Suchitra <SLukes@sandiego.gov>; tomlins@sandiego.gov  
**Subject:** [EXTERNAL] Housing Action Plan

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Dear Mr. Lee

As a University City resident I am contacting you to express my objections regarding several areas of the City's recent Environmental Impact Report due to several key concerns, some of which were already rejected by UC residents when the 'Housing Action Plan' part of State Bill 10 failed to pass in August 2023. Here are just some key concerns:

I109-1

### Governor Drive Lane Reductions

The City acknowledged at a recent meeting in early April that while traffic "models" were done for the EIR draft plan, they were not done for the high-density alternative that is included in the EIR. Moreover, there was no new traffic count or specific study of Governor Drive regarding what the City now calls "complete streets. It has been confirmed that the City has not done a comprehensive Traffic Study since 2015 and is basing their Vehicle Miles Traveled (VMT) data on a study done in 2016. In summary, Governor Drive should not be reduced to two lanes without a current and legally valid Traffic Study with a full VMT analysis.

I109-2

I109-3

I109-4

### Emergency Ingress/Egress

Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as its proximity to MCAS, just to name two factors. Again, the City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.

I109-5

### New High-Rise Apartments Planned for Genesee and Nobel Drive

Under the City's "Complete Communities Housing Solutions" regulations, we understand that Willmark Communities is seeking permission to build three high-rise towers comprising 1,315 "luxury" apartments, with only 1,350 onsite parking spaces, on the southwest corner of Nobel and Genesee, replacing a 108-unit two-story apartment complex. This is yet another example of the

I109-6

City falling short on its promise to add more affordable housing, while such a project will only increase traffic gridlock along Genesee during certain times of the day, particularly during rush hours and when the schools let out and parents are attempting to pick up or drop off their children.

I109-6  
cont.

### **Vons & Sprouts Centers New Height and Sharply Higher Density Allowances**

The planned sharp increase in overall housing density allowances is now coupled with the EIR showing that the City has ignored UC community requests and is forging ahead to raise the allowable structure heights of the Von’s shopping plaza on Governor Drive/Genesee to 100 feet or 10 stories with residential units added to those areas.

I109-7

That alone will further impact all kinds of mobility along Governor Drive & onto Genesee as well as to 805 to the east, and Regents toward the west, where a similar plan is on deck for the Sprout’s shopping plaza. The Sprout’s shopping center is NOT an existing Transit Priority Area or TPA. Buses do not stop there frequently, and it is not close to the trolley and an existing TPA.

### **Planning Deficiencies in Parks**

Under the City’s ‘Master Plan’, the UC area is already short on publicly accessible parks – not “greenways” or some other term that in reality is not a park, or in a land-use area that does not allow residential use. It is also our understanding that developers can now pay a one-time, in-lieu fee and not provide such amenities as a small recreational area in their residential complex plans. The City has fallen short in this key area while also allowing developers to buy their way out of providing more green spaces or publicly accessible recreation areas.

I109-8

In summary, these initiatives ignore the need for a workable and supportive infrastructure. It fails to provide even somewhat affordable housing, disregards existing residents’ input, and intentionally erodes single-family neighborhoods.

I109-9

The most harmful high-density housing initiative the City attempted to pass was SB 10, which would have allowed as many as 14-unit buildings up to three stories high on single-family parcels and no contained parking requirements. Thanks to a successful opposition campaign, SB 10 was removed from the Housing Action Package.

I109-10

Thank you for your time and consideration. Such initiatives call for planning that balanced growth rates with an infrastructure where families can grow and thrive. Most of all, responsible growth includes residents in decision-making.

I109-11

Xianjin Zhou  
Cambridge Terrance Owner's Association

**I109: Response to Xianjin Zhou Comment Letter**

**I109-1:** The comment introduces the commenter's general concern with the Draft Program Environmental Impact Report (PEIR). The comment has been noted and no further response is required.

**I109-2:** See response to comment I8-2 under comment letter I8.

**I109-3:** See response to comment I8-3 under comment letter I8.

**I109-4:** See response to comment I8-4 under comment letter I8.

**I109-5:** See response to comment I8-5 under comment letter I8.

**I109-6:** See response to comment I8-6 under comment letter I8.

**I109-7:** See response to comment I8-7 under comment letter I8.

**I109-8:** See response to comment I8-8 under comment letter I8.

**I109-9:** The comment generally addresses overall concerns with the proposed University Community Plan Update. It does not address the adequacy of the environmental analysis in the Draft PEIR. The concerns have been noted; no further response is necessary.

**I109-10:** The comment is about a previous project that is not a part of the project evaluated in the Draft PEIR. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

**I109-11:** The comment has been noted. The comment does not address the adequacy of the environmental analysis in the Draft PEIR. No further response is required.

## Comment Letter I110 - Chris Zibert

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: University City Community Plan Update  
**Date:** Tuesday, April 30, 2024 9:10:53 AM

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**From:** Chris Zibert <clzibert@hotmail.com>  
**Sent:** Sunday, April 28, 2024 1:24 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>  
**Subject:** [EXTERNAL] University City Community Plan Update

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All--

I am submitting comments on the Draft Program Environmental Impact Report (DPEIR) for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan and University Community Plan and Local Coastal Program Update - Document issued March 14, 2024.

I110- 1

My comments are with respect to the analysis performed for the University Community Plan Update. I support all of the comments submitted by Help Save UC dated April 25, 2024. I especially want to comment on the following:

1. The City should prepare a DPEIR specific to the University Community Plan Update. Combining the Blueprint San Diego program, the Hillcrest Plan Amendment and the University Community Plan Update into one document made the document confusing, overwhelming and not accessible to the public, thus failing CEQA's requirement to provide an informational document to inform the general public of the significant environmental effect of a project.
2. The City's failure to evaluate the full environmental impacts of the

I110- 2

I110- 3



University Community Plan Update at full buildout, including the impact of the Complete Communities program, makes the document inadequate, specifically for areas such as Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire.

I110- 3  
cont.

3. The City’s failure to conduct an updated traffic study to support the reduction of Governor Drive to two lanes renders the DPEIR inadequate. **Our neighborhood has three four busy schools, including a magnet, attracting people from communities north of I-8. Adding incredible numbers of residents and suggesting shrinking our thoroughfares is really 20 years ago urban planning.**

I110- 4

4. The DPEIR is inadequate due to its failure to evaluate appropriate alternatives. It is disingenuous for the City to evaluate the High Density Alternative (formerly known as Scenario 1) that was no longer under consideration for the University Community Plan Update. **The City is supposed to evaluate alternatives that are feasible and capable of avoiding or substantially lessening any significant effects of the project. The appropriate way to do that would have been to evaluate a lower density alternative, such as the “community-preferred alternative” (Scenario B) in the City’s last draft of the Plan Update. Instead, the City evaluated a Higher Density alternative that the City admitted wasn’t feasible.**

I110- 5

5. Finally, the City’s conclusion that the High Density Alternative was the environmentally superior alternative **isn’t supported by the evidence.** Table 8-1 shows that the High Density alternative results in greater impacts on the environment. Furthermore, the City’s own conclusion states, “No significant impacts of the project would be completely avoided by this [High Density] alternative and on the

I110- 6

balance, impacts would slightly increase compared to the project.”

(Section 8.2.3, underline added.)

I110- 6  
cont.

Please revise the EIR to account for this. This entire process has resulted in the concerns of **actual residents** being dismissed and disregarded at every turn of this process. Given the population decline the city is experiencing, and is projected to continue to experience, a project of this magnitude seems unwarranted.

I110- 7

Please listen to us for once, so we don't feel like we have to move out too.

I110- 8

Thanks,

Chris Zibert

UC Resident

**I110: Responses to Chris Zibert Comment Letter**

**I110-1:** The comment is an introduction to the letter. No response is required.

**I110-2:** See response to comment O13-6 under comment letter O13 and response to comment I11-3 under comment letter I11.

**I110-3:** See response to comment I11-3 under comment letter I11.

**I110-4:** See response to comment I11-4 under comment letter I11.

**I110-5:** See response to comment I11-5 under comment letter I11.

**I110-6:** See response to comment I11-6 under comment letter I11.

**I110-7:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft Program Environmental Impact Report (PEIR). No further response is required.

**I110-8:** Comment noted. The comment does not raise an issue related to the adequacy of the analysis in the Draft PEIR. No further response is required.

## Comment Letter I111 - John Ziebarth

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: PEIR University City Community Plan Update comments  
**Date:** Friday, April 19, 2024 10:57:42 AM  
**Attachments:** [PEIR comments 4-19-24.pdf](#)

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**From:** John Ziebarth <[john@zaap.biz](mailto:john@zaap.biz)>  
**Sent:** Friday, April 19, 2024 9:32 AM  
**To:** PLN\_PlanningCEQA <[planningceqa@sandiego.gov](mailto:planningceqa@sandiego.gov)>  
**Subject:** [EXTERNAL] PEIR University City Community Plan Update comments

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Attached are my comments on the PEIR for the University City Community Plan Update.

I111-1

John Ziebarth

John Ziebarth  
1435 Alexandria Drive  
San Diego, CA 92107  
April 19, 2023

City of San Diego Planning Department  
9485 Aero Dr  
San Diego, CA 92123

Re: Comments on PEIR for Second Draft University City Community Plan Update

Dear Planner:

I have two issues with the PEIR. The first with respect to Mobility is not a flaw in the document, but rather a serious concern regarding the significant traffic impacts.

The Draft Mobility Technical Report Appendix A-Existing Conditions Report on page 14-21 identified 26 intersections currently working at less than acceptable conditions. Page 71 of the Draft Mobility Technical Report indicates that with the Update Plan changes there will result in 37 intersections that will not be acceptable in Horizon year. The report says that 34 percent of those intersections that are substandard are located along corridors with flexible/ transit only lane or bicycle facilities. It says that the conversion to flexible lanes could be re-evaluated to delay or convert back to exiting lane configuration. Deeper analysis indicates that most of the new failed intersections are due to lane conversions. Flex/transit lanes can be easily adjusted, but bicycle facilities cannot.

I115-2

Request: please identify how many are caused by flexible/transit only lanes and how many are due to bicycle facilities. For example, Governor at Regents goes from LOS B to E simply due to bicycle facilities being added. Existing bicycle conditions indicate that bicycle ridership is less maybe .5 % of the vehicular traffic. Assuming an increase to 2% bicycle ridership, that would mean 400 bicycles on Governor. Is 2% sufficient to warrant creating the traffic congestion and the resultant air pollution resulting from it. This is just one example.

I115-3

Even by utilizing VMT rather than LOS, The Update has significant environmental traffic impacts per 4.2 Significance of Impacts Vehicle Miles Traveled per Capita – SB 743 Analysis The project would **have a significant VMT impact** at the program level due to residential, employment, and retail VMT for the Blueprint SD Initiative and University CPU. The PEIR fails to analyze air quality or greenhouse gas impacts of the traffic impacts. Neither of which were analyzed in the PEIR.

I115-4

The second concern is about the failure in the air quality and GHG analysis to address the air quality and GHG impacts resulting from increasing traffic congestion resulting from increasing the number of significantly impacted intersections from 26 to 37. This increase in significant traffic impacts results in some cases from the creation of bike lanes at the expense of vehicular lanes. Those new significantly impacted intersections will create CO hotspots creating pollution impacting even the cyclist riding on those streets. It should not be sufficient to say that we are

I115-5

complying with the policies of the Climate Action Plan to say that the impacts are less than significant. This is especially true when the VMT traffic assessment itself says that VMT impacts in University City would be significant.

**I115-5  
cont.**

Respectfully,



John C. Ziebarth

**I111: Responses to John Ziebarth Comment Letter**

**I111-1:** The comment is an introduction to the letter. No response is required.

**I111-2:** The comment is about the Draft Mobility Technical Report, which was prepared to inform mobility decisions for the University Community Plan Update (CPU), but is not a part of the University CPU, and was not analyzed in the Draft Program Environmental Impact Report (PEIR). The traffic analysis in the Draft PEIR is based on the Vehicle Miles Traveled (VMT) Analysis (Appendix J) prepared for the proposed project. Transportation impacts are discussed in Section 4.14 of the Draft PEIR.

**I111-3:** This request is for the Draft Mobility Technical Report. See response to comment I111-2.

**I111-4:** As mentioned by the commenter, the VMT impacts of the proposed project would be significant, as described in Section 4.14.7.2 of the Draft PEIR. Air quality impacts related to mobile sources, such as vehicles, is discussed in Section 4.2.4, Issue 3(b). Greenhouse gas emission (GHG) impacts are discussed in Section 4.7.4, Issue 1. The method for determining significance as it relates to the project's consistency with the City's Climate Action Plan (CAP) is accomplished through evaluation of the project's consistency with General Plan policies LU-A.6, ME-D.17, CE-J.2, and CE-J.3 and consistency with the CAP's strategies, specifically Strategy 3. Quantification of GHG emissions is not required for the project based on the City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (2022). Pursuant to the City Planning Department's June 17, 2022, memorandum—Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Infrastructure Projects—the environmental analysis for plan- and policy-level documents such as the Blueprint SD Initiative, University CPU, and Hilcrest Focused Plan Amendment (FPA) should address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP.

**I111-5:** The Draft PEIR discusses air quality and GHG emissions impacts in Sections 4.2.4 and 4.7.4, respectively. As mentioned in response to comment I111-4, the quantification of GHG emissions is not required for the project based on the City's CEQA Significance Determination Thresholds (2022). Additionally, CEQA Guidelines Section 15064.3 no longer uses auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. However, the air quality impact assessment does take into account air quality impacts related mobile sources, as described in response to comment I111-4.

## Comment Letter I112 - Jan and Valerie Zverina

**From:** [Ash-Reynolds, Tara](#) on behalf of [PLN\\_PlanningCEQA](#)  
**To:** [Lombrozo, Ari](#)  
**Subject:** FW: [EXTERNAL] Comments to University Community Plan Update -- Draft EIR  
**Date:** Thursday, April 25, 2024 8:11:23 AM

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**From:** Jan Zverina <jazverina@gmail.com>  
**Sent:** Wednesday, April 24, 2024 4:18 PM  
**To:** PLN\_PlanningCEQA <planningceqa@sandiego.gov>  
**Cc:** Gloria, Todd <MayorToddGloria@sandiego.gov>; CouncilMember Kent Lee <KentLee@sandiego.gov>; Galloway, Tait <TGalloway@sandiego.gov>; Tomlins, Coby <CTomlins@sandiego.gov>; Lukes, Suchitra <SLukes@sandiego.gov>; Causman, Nathen <NCausman@sandiego.gov>; CouncilMember Joe LaCava <JoeLaCava@sandiego.gov>; University City Peeps <universitycitypeeps@gmail.com>  
**Subject:** [EXTERNAL] Comments to University Community Plan Update -- Draft EIR

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To Whom It May Concern:

Below are my comments and objections to several parts of the City of San Diego's University Community Plan Update Draft EIR (DEIR) as several of them are legally deficient:

I. Changes to Governor Drive: Converting Governor Drive from a four-lane Major Arterial to two-lanes may actually fail the legal test because it is based upon a computer model rather than actual measurements using the eight-year-old SANDAG 2016 Base Year forecast. **No changes to Governor Drive can be made without a current Traffic Analysis and VMT performed at peak hour traffic times.**

I112-1

II. Emergency Access/Ingress:  
Related to the Governor Drive lane reductions combined with substantially higher density allowances, such a plan ignores the reality of the impact it will have on emergency vehicles getting through in time, or worse yet if residents needed to evacuate in the event of a disaster in an area that already is in a potential wildfire zone as well as it's proximity to MCAS Miramar, just to name two factors. **The City is under legal obligation to conduct a current and legally valid Traffic Study with a full VMT analysis along the Governor Drive corridor.** Without such an analysis, the DEIR cannot conclude the impact will be less than significant.

I112-2

III. School Requirements from the San Diego School District Must Be Met: The DEIR states "No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. These policies direct the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12th grade educational facilities to serve future students within the University CPU, as needed. In a memorandum submitted on September 14, 2023, the San Diego School District informed the City that the University Community Plan Update should identify an area for a future school in the area of the intersection La Jolla Village Drive and Genesee. **Notably, most of the school district's memorandum was incorporated into the DEIR, but this statement was not.**

I112-3

IV. The Community-Preferred Alternative Plan Must Be Included in the Land Plan Alternative

I112-4



Analysis. CEQA requires a reasonable range of alternatives to the project under review. The DEIR does not meet these basic requirements for a sufficient alternatives analysis to the proposed University CPU. The DEIR only includes one alternative relating specifically to the University CPU, and that alternative increases density to the extent of being unfeasible. **The DEIR needs to be revised to include the community's preferred alternative.**

I112-4  
cont.

V. The City Should Prepare a DEIR Specific to the University CPU. Use of a program EIR for two completely separate and distinct neighborhoods in addition to an overarching amendment to the general plan and a local coastal program update contradicts the informational requirement of the California Environmental Quality Act (CEQA). According to CEQA, the Environmental Impact Report is first and foremost an informational document for the decision-makers and the public. The DEIR is more than 800 pages long, not including the technical appendices, and purports to amend three separate policy documents: the University City EIR, the Hillcrest Focused Plan Amendment and Blueprint SD, and an amendment to the City's general plan. The very density and wide-ranging goals of the DEIR make it nearly impossible for the public to glean information. **The DEIR should be separated into three separate EIRs for each proposed plan update.**

I112-5

VI. The DEIR Should Evaluate the Full Spectrum of Environmental Impacts: The City's DEIR fails to analyze the full range of environmental impacts of the University CPU at full buildout, making the document inadequate. The DEIR should contain a thorough analysis of Aesthetics, Air Quality, Biological Resources, Greenhouse Gas Emissions, Noise, Public Services, Recreation, Transportation, and Wildfire. **Additionally it should address the additional impacts of projects built under the lenient guidelines of the Complete Communities Housing Solutions program.**

I112-6

I112-7

**I hope that this time around the City does seriously welcome thoughtful input and inclusion from residents!**

I112-8

Jan & Valerie Zverina  
4325 Via Monclova  
San Diego CA 92122

**I112: Responses to Jan and Valerie Zverina Comment Letter**

**I112-1:** See response to comments O13-1 and O13-2 under comment letter O13.

**I112-2:** See response to comment O13-3 under comment letter O13.

**I112-3:** See response to comment O13-4 under comment letter O13.

**I112-4:** See response to comment O13-5 under comment letter O13.

**I112-5:** See response to comment O13-6 under comment letter O13.

**I112-6:** See response to comment O13-7 under comment letter O13.

**I112-7:** See response to comment O13-8 under comment letter O13.

**I112-8:** Comment noted.

**Final  
Blueprint SD Initiative,  
Hillcrest Focused Plan Amendment, and  
University Community Plan Update  
Program EIR  
San Diego, California  
SCH No. 2021070359**

July 11, 2024

## TABLE OF CONTENTS

<b>List of Abbreviated Terms.....</b>	<b>xi</b>
<b>Executive Summary.....</b>	<b>S-1</b>
S.1    Project Overview .....	S-1
S.2    PEIR Process.....	S-3
S.3    Areas of Controversy .....	S-3
S.4    Summary of Environmental Impacts and Significance Conclusions.....	S-4
<b>1.0    Introduction.....</b>	<b>1-1</b>
1.1    Purpose of the PEIR .....	1-2
1.2    Type of EIR .....	1-2
1.3    Legal Authority .....	1-3
1.4    Notice of Preparation .....	1-5
1.5    Scope of this PEIR.....	1-6
1.6    Incorporation by Reference.....	1-7
1.7    PEIR Process.....	1-8
<b>2.0    Environmental Setting.....</b>	<b>2-1</b>
2.1    Project Location.....	2-1
2.2    Geography and Topography.....	2-11
2.3    Climate.....	2-12
2.4    Existing Land Use .....	2-13
<b>3.0    Project Description.....</b>	<b>3-1</b>
3.1    Introduction .....	3-1
3.2    Project Background .....	3-1
3.3    Project Objectives .....	3-6
3.4    Project Location.....	3-8
3.5    Project Description .....	3-14
3.6    Discretionary Actions.....	3-94
3.7    Future Actions .....	3-94
<b>4.0    Environmental Analysis.....</b>	<b>4-1</b>
4.1    Aesthetics.....	4-1-1
4.2    Air Quality.....	4-2-1
4.3    Biological Resources.....	4-3-1
4.4    Cultural Resources.....	4-4-1
4.5    Energy .....	4-5-1
4.6    Geology and Soils .....	4-6-1
4.7    Greenhouse Gases.....	4-7-1

**TABLE OF CONTENTS (cont.)**

4.8	Hazards and Hazardous Materials .....	4.8-1
4.9	Hydrology.....	4.9-1
4.10	Land Use and Planning.....	4.10-1
4.11	Noise.....	4.11-1
4.12	Public Services.....	4.12-1
4.13	Recreation .....	4.13-1
4.14	Transportation.....	4.14-1
4.15	Tribal Cultural Resources.....	4.15-1
4.16	Utilities and Service Systems.....	4.16-1
4.17	Water Quality.....	4.17-1
4.18	Wildfire .....	4.18-1
<b>5.0</b>	<b>Effects Found Not to Be Significant .....</b>	<b>5-1</b>
5.1	Agriculture and Forestry Resources .....	5-1
5.2	Mineral Resources .....	5-2
5.3	Population and Housing .....	5-3
<b>6.0</b>	<b>Growth Inducement.....</b>	<b>6-1</b>
6.1	Blueprint SD Initiative .....	6-2
6.2	Hillcrest Focused Plan Amendment .....	6-3
6.3	University Community Plan Update .....	6-3
<b>7.0</b>	<b>Significant Unavoidable Impacts/Significant Irreversible Environmental Changes.....</b>	<b>7-1</b>
7.1	Significant and Unavoidable Impacts.....	7-1
7.2	Significant Irreversible Environmental Impacts.....	7-3
<b>8.0</b>	<b>Alternatives .....</b>	<b>8-1</b>
8.1	No Project Alternative .....	8-4
8.2	<u>High Density Alternative</u> University Community Plan Update and Hillcrest Focused Plan Amendment <u>High Density Alternative</u> .....	8-17
8.3	Blueprint SD Initiative Distributed Growth Alternative.....	8-31
8.4	<u>Reduced Density Alternative</u> Population and Housing.....	8-43
8.5	Environmentally Superior Alternative .....	8-55
<b>9.0</b>	<b>Mitigation Monitoring and Reporting Program.....</b>	<b>9-1</b>
<b>10.0</b>	<b>Certification .....</b>	<b>10-1</b>
<b>11.0</b>	<b>References .....</b>	<b>11-1</b>

## TABLE OF CONTENTS (cont.)

### FIGURES

2-1:	Regional Location .....	2-2
2-2:	Existing General Plan LU-1 Village Propensity.....	2-3
2-3:	Existing General Plan LU-1 Village Propensity.....	2-5
2-4:	Hillcrest Focused Plan Area Adopted Land Uses .....	2-6
2-5:	University Community Plan Update Area on Aerial Photograph.....	2-8
2-6:	University Community Plan Update Area Adopted Land Uses .....	2-9
2-7:	University Community Plan Update Area Neighborhoods.....	2-10
3-1a:	Village Climate Goal Propensity Map – South .....	3-9
3-1b:	Village Climate Goal Propensity Map – South Central.....	3-10
3-1c:	Village Climate Goal Propensity Map – North Central.....	3-11
3-1d:	Village Climate Goal Propensity Map – North .....	3-12
3-1e:	Village Climate Goal Propensity Map – Northeast .....	3-13
3-2:	General Plan Land Use Street System .....	3-17
3-3:	Planning Areas and Prospective Annexation Areas.....	3-18
3-4:	Transit and Land Use Connections with Plan Land Use .....	3-19
3-5:	Transit and Land Use Connections with Village Propensity .....	3-20
3-6:	Existing and Proposed Bikeways.....	3-21
3-7:	Community Plan Designated Open Space and Parks Map.....	3-23
3-8a:	<u>Revised Uptown Community Plan</u> Land Use Map .....	3-29
3-8b:	Uptown Land Use Map .....	3-30
3-8c:	Uptown Land Use Map - <u>East</u> .....	3-31
3-9:	Hillcrest Focused Plan Area Zoning .....	3-33
3-10:	Uptown Existing and Planned Bicycle Network .....	3-35
3-11:	Uptown Community Plan Pedestrian Routes.....	3-38
3-12:	Uptown Planned Transit Facilities.....	3-39
3-13:	Uptown Planned Street Classifications .....	3-40
3-14:	Uptown LGBTQ+ Cultural District .....	3-42
3-15:	Uptown Parks, Recreation Facilities and Open Space.....	3-44
3-16:	Uptown Economic Revitalization Areas.....	3-47
3-17:	Uptown Community Plan Implementation Overlay Zone – Type A.....	3-48
3-18:	Hillcrest District Promenades .....	3-52
3-19:	University Community Plan Update Area Proposed Land Uses .....	3-53
3-20:	University <u>Community Plan</u> Planned Bicycle Facilities .....	3-59
3-21:	University Planned Pedestrian Facilities .....	3-71
3-22:	University Community Plan Planned Transit Facilities.....	3-74
3-23:	University Potential Transit Facilities.....	3-75
3-24:	<u>University Community Plan Planned Roadway Network</u> <u>University Existing and Proposed</u> <u>Parks</u> .....	3-77
3-25:	University Existing and Proposed <u>Parks</u> <u>Trails</u> .....	3-81
3-26:	University <u>Existing and Proposed</u> <u>Trails</u> .....	3-83
3-27:	Open Space to be Dedicated Pursuant to Charter 55.....	3-85
3-28:	University Community Plan Update Area Multi-Habitat Planning Area Additions.....	3-86

## TABLE OF CONTENTS (cont.)

### FIGURES (cont.)

3-29:	University Community Plan Area Tier I Master-Planned Communities .....	3-89
3-30:	University Community Plan Implementation Overlay Zone .....	3-92
4.3-1a:	Vegetation Communities and Land Cover Types in Relation to Blueprint SD Initiative Climate Smart Village Areas – South.....	4.3-2
4.3-1b:	Vegetation Communities and Land Cover Types in Relation to Blueprint SD Initiative Climate Smart Village Areas – South Centra.....	4.3-3
4.3-1c:	Vegetation Communities and Land Cover Types in Relation to Blueprint SD Initiative Climate Smart Village Areas – North Central.....	4.3-4
4.3-1d:	Vegetation Communities and Land Cover Types in Relation to Blueprint SD Initiative Climate Smart Village Areas – North.....	4.3-5
4.3-1e:	Vegetation Communities and Land Cover Types in Relation to Blueprint SD Initiative Climate Smart Village Areas – North.....	4.3-6
4.3-2:	Vegetation Communities and Land Cover Types in Relation to the Hillcrest Focused Plan Amendment Area .....	4.3-9
4.3-3:	Vegetation Communities and Land Cover Types in Relation to the University Community Plan Update Area .....	4.3-10
4.3-4a:	Potential Wetlands in Relation to Blueprint SD Initiative Climate Smart Village Areas – South.....	4.3-34
4.3-4b:	Potential Wetlands in Relation to Blueprint SD Initiative Climate Smart Village Areas – South Central.....	4.3-35
4.3-4c:	Potential Wetlands in Relation to Blueprint SD Initiative Climate Smart Village Areas – North Central.....	4.3-36
4.3-4d:	Potential Wetlands in Relation to Blueprint SD Initiative Climate Smart Village Areas – North.....	4.3-37
4.3-4e:	Potential Wetlands in Relation to Blueprint SD Initiative Climate Smart Village Areas – Northeast .....	4.3-38
4.3-5:	Potential Wetlands in Relation to the University Community Plan Update Area .....	4.3-39
4.3-6a:	Critical Habitats in Relation to Blueprint SD Initiative Climate Smart Village Areas – South.....	4.3-41
4.3-6b:	Critical Habitats in Relation to Blueprint SD Initiative Climate Smart Village Areas - South Central.....	4.3-42
4.3-6c:	Critical Habitats in Relation to Blueprint SD Initiative Climate Smart Village Areas - North Central.....	4.3-43
4.3-6d:	Critical Habitats in Relation to Blueprint SD Initiative Climate Smart Village Areas – North.....	4.3-44
4.3-6e:	Critical Habitats in Relation to Blueprint SD Initiative Climate Smart Village Areas – Northeast .....	4.3-45
4.3-7:	Critical Habitats in Relation to the University Community Plan Update Area .....	4.3-46
4.4-1a:	Cultural Resource Sensitivity in Relation to Blueprint SD Initiative Climate Smart Village Areas – South.....	4.4-32
4.4-1b:	Cultural Resource Sensitivity in Relation to Blueprint SD Initiative Climate Smart Village Areas – South Central.....	4.4-33

## TABLE OF CONTENTS (cont.)

### FIGURES (cont.)

4.4-1c:	Cultural Resource Sensitivity in Relation to Blueprint SD Initiative Climate Smart Village Areas – North Central.....	4.4-34
4.4-1d:	Cultural Resource Sensitivity in Relation to Blueprint SD Initiative Climate Smart Village Areas – North.....	4.4-35
4.4-1e:	Cultural Resource Sensitivity in Relation to Blueprint SD Initiative Climate Smart Village Areas – Northeast.....	4.4-36
4.4-2:	Cultural Resource Sensitivity in Relation to Hillcrest Focused Plan Amendment Area ..	4.4-37
4.4-3:	Cultural Resource Sensitivity in Relation to the University Community Plan Update Area.....	4.4-38
4.6-1a:	Regional Geology in Relation to Blueprint SD Initiative Climate Smart Village Areas – South .....	4.6-2
4.6-1b:	Regional Geology in Relation to Blueprint SD Initiative Climate Smart Village Areas – South Central .....	4.6-3
4.6-1c:	Regional Geology in Relation to Blueprint SD Initiative Climate Smart Village Areas – North Central .....	4.6-4
4.6-1d:	Regional Geology in Relation to Blueprint SD Initiative Climate Smart Village Areas – North .....	4.6-5
4.6-1e:	Regional Geology in Relation to Blueprint SD Initiative Climate Smart Village Areas – Northeast.....	4.6-6
4.6-2:	Regional Geology in Relation to University Community Plan Update Area .....	4.6-7
4.6-3a:	Geologic Hazards in Relation to Blueprint SD Initiative Climate Smart Village Areas – South .....	4.6-12
4.6-3b:	Geologic Hazards in Relation to Blueprint SD Initiative Climate Smart Village Areas – South Central .....	4.6-13
4.6-3c:	Geologic Hazards in Relation to Blueprint SD Initiative Climate Smart Village Areas – North Central .....	4.6-14
4.6-3d:	Geologic Hazards in Relation to Blueprint SD Initiative Climate Smart Village Areas – North .....	4.6-15
4.6-3e:	Geologic Hazards in Relation to Blueprint SD Initiative Climate Smart Village Areas – Northeast.....	4.6-16
4.6-4:	Geologic Hazards in Relation to University Community Plan Update Area .....	4.6-17
4.9-1a:	Watersheds in Relation to the Project Areas – South.....	4.9-2
4.9-1b:	Watersheds in Relation to the Project Areas – South Central.....	4.9-3
4.9-1c:	Watersheds in Relation to the Project Areas – North Central.....	4.9-4
4.9-1d:	Watersheds in Relation to the Project Areas – North.....	4.9-5
4.9-1e:	Watersheds in Relation to the Project Areas – Northeast .....	4.9-6
4.9-2a:	Floodplains in Relation to the Project Areas – South .....	4.9-8
4.9-2b:	Floodplains in Relation to the Project Areas – South Central.....	4.9-9
4.9-2c:	Floodplains in Relation to the Project Areas – North Central.....	4.9-10
4.9-2d:	Floodplains in Relation to the Project Areas – North .....	4.9-11
4.9-2e:	Floodplains in Relation to the Project Areas – Northeast.....	4.9-12
4.9-3:	Floodplains in Relation to University Community Plan Update Area.....	4.9-14



## TABLE OF CONTENTS (cont.)

### FIGURES (cont.)

4.9-4a:	Waterways in Relation to the Project Areas – South .....	4.9-16
4.9-4b:	Waterways in Relation to the Project Areas – South Central .....	4.9-17
4.9-4c:	Waterways in Relation to the Project Areas – North Central .....	4.9-18
4.9-4d:	Waterways in Relation to the Project Areas – North .....	4.9-19
4.9-4e:	Waterways in Relation to the Project Areas – Northeast.....	4.9-20
4.9-5a:	Dam Inundation Areas in Relation to the Project Areas – South.....	4.9-21
4.9-5b:	Dam Inundation Areas in Relation to the Project Areas – South Central .....	4.9-22
4.9-5c:	Dam Inundation Areas in Relation to the Project Areas – North Central .....	4.9-23
4.9-5d:	Dam Inundation Areas in Relation to the Project Areas – North.....	4.9-24
4.9-5e:	Dam Inundation Areas in Relation to the Project Areas – Northeast.....	4.9-25
4.9-6a:	Tsunami Inundation Zones in Relation to the Project Areas – South .....	4.9-26
4.9-6b:	Tsunami Inundation Zones in Relation to the Project Areas – South Central.....	4.9-27
4.9-6c:	Tsunami Inundation Zones in Relation to the Project Areas – North Central.....	4.9-28
4.9-6d:	Tsunami Inundation Zones in Relation to the Project Areas – North .....	4.9-29
4.9-6e:	Tsunami Inundation Zones in Relation to the Project Areas – Northeast .....	4.9-30
4.10-1:	University Community Plan Update Area - Specific and Master Plans .....	4.10-4
4.10-2a:	Airport Influence Areas (AIAs) in Relation to Blueprint SD Initiative Climate Smart Village Areas – South.....	4.10-6
4.10-2b:	Airport Influence Areas (AIAs) in Relation to Blueprint SD Initiative Climate Smart Village Areas - South Central.....	4.10-7
4.10-2c:	Airport Influence Areas (AIAs) in Relation to Blueprint SD Initiative Climate Smart Village Areas - North Central.....	4.10-8
4.10-2d:	Airport Influence Areas (AIAs) in Relation to Blueprint SD Initiative Climate Smart Village Areas – North.....	4.10-9
4.10-2e:	Airport Influence Areas (AIAs) in Relation to Blueprint SD Initiative Climate Smart Village Areas – Northeast .....	4.10-10
4.10-3:	Airport Influence Areas (AIAs) in Relation to Hillcrest Focused Plan Amendment Area.....	4.10-11
4.10-4:	Airport Influence Areas (AIAs) in Relation to University Community Plan Update Area.....	4.10-12
4.10-5a:	San Diego International Airport Noise Contours .....	4.10-19
4.10-5b:	San Diego International Airport Safety Zones .....	4.10-20
4.10-6a:	Brown Field Municipal Airport Noise Contours .....	4.10-22
4.10-6b:	Brown Field Municipal Airport Safety Zones .....	4.10-23
4.10-7a:	Marine Corps Air Station (MCAS) Miramar Airport Noise Contours.....	4.10-26
4.10-7b:	Marine Corps Air Station (MCAS) Miramar Airport Safety Zones .....	4.10-27
4.10-8a:	Montgomery Field Airport Noise Contours .....	4.10-30
4.10-8b:	Montgomery Field Airport Safety Zones .....	4.10-31
4.10-9a:	NOLF Imperial Beach Airport Noise Contours .....	4.10-32
4.10-9b:	NOLF Imperial Beach Airport Safety Zones .....	4.10-33

## TABLE OF CONTENTS (cont.)

### FIGURES (cont.)

4.10-10a: Multi-Habitat Planning Area (MHPA) in Relation to Blueprint SD Initiative Climate Smart Village Areas – South.....	4.10-45
4.10-10b: Multi-Habitat Planning Area (MHPA) in Relation to Blueprint SD Initiative Climate Smart Village Areas – South Central.....	4.10-46
4.10-10c: Multi-Habitat Planning Area (MHPA) in Relation to Blueprint SD Initiative Climate Smart Village Areas – North Central.....	4.10-47
4.10-10d: Multi-Habitat Planning Area (MHPA) in Relation to Blueprint SD Initiative Climate Smart Village Areas – North.....	4.10-48
4.10-10e: Multi-Habitat Planning Area (MHPA) in Relation to Blueprint SD Initiative Climate Smart Village Areas – Northeast .....	4.10-49
4.10-11: Multi-Habitat Planning Area (MHPA) and Conserved Lands in Relation to Hillcrest Focused Plan Amendment Area .....	4.10-50
4.10-12: Multi-Habitat Planning Area (MHPA) and Conserved Lands in Relation to University Community Plan Update Area .....	4.10-51
4.10-13a: Project Areas in Relation to the Local Coastal Plan Boundary – South.....	4.10-74
4.10-13b: Project Areas in Relation to the Local Coastal Plan Boundary – South Central.....	4.10-75
4.10-13c: Project Areas in Relation to the Local Coastal Plan Boundary – North Central.....	4.10-76
4.10-13d: Project Areas in Relation to the Local Coastal Plan Boundary – North.....	4.10-77
4.10-13e: Project Areas in Relation to the Local Coastal Plan Boundary – Northeast .....	4.10-78
4.10-14: University Community Plan Update Area in Relation to the Local Coastal Plan Boundary.....	4.10-79
4.12-1a: Existing Fire Stations in Relation to the Project Areas – South .....	4.12-2
4.12-1b: Existing Fire Stations in Relation to the Project Areas – South Central.....	4.12-3
4.12-1c: Existing Fire Stations in Relation to the Project Areas – North Central.....	4.12-4
4.12-1d: Existing Fire Stations in Relation to the Project Areas – North .....	4.12-5
4.12-1e: Existing Fire Stations in Relation to the Project Areas – Northeast.....	4.12-6
4.12-2a: Existing Police Stations in Relation to the Project Areas – South .....	4.12-13
4.12-2b: Existing Police Stations in Relation to the Project Areas – South Central.....	4.12-14
4.12-2c: Existing Police Stations in Relation to the Project Areas – North Central.....	4.12-15
4.12-2d: Existing Police Stations in Relation to the Project Areas – North .....	4.12-16
4.12-2e: Existing Police Stations in Relation to the Project Areas – Northeast .....	4.12-17
4.12-3a: Libraries in Relation to the Project Areas – South .....	4.12-23
4.12-3b: Libraries in Relation to the Project Areas – South Central.....	4.12-24
4.12-3c: Libraries in Relation to the Project Areas - North Central .....	4.12-25
4.12-3d: Libraries in Relation to the Project Areas – North .....	4.12-26
4.12-3e: Libraries in Relation to the Project Areas – Northeast.....	4.12-27
4.18-1a: Fire Hazard Severity Zones in Relation to the Project Areas – South.....	4.18-4
4.18-1b: Fire Hazard Severity Zones in Relation to the Project Areas - South Central.....	4.18-5
4.18-1c: Fire Hazard Severity Zones in Relation to the Project Areas - North Central.....	4.18-6
4.18-1d: Fire Hazard Severity Zones in Relation to the Project Areas – North.....	4.18-7
4.18-1e: Fire Hazard Severity Zones in Relation to the Project Areas – Northeast .....	4.18-8

## TABLE OF CONTENTS (cont.)

### FIGURES (cont.)

4.18-2a:	Fire Threat Level in Relation to the Project Areas – South .....	4.18-9
4.18-2b:	Fire Threat Level in Relation to the Project Areas - South Central .....	4.18-10
4.18-2c:	Fire Threat Level in Relation to the Project Areas - North Central .....	4.18-11
4.18-2d:	Fire Threat Level in Relation to the Project Areas – North .....	4.18-12
4.18-2e:	Fire Threat Level in Relation to the Project Areas – Northeast .....	4.18-13
4.18-3:	Fire Hazard Severity Zones in Relation to Hillcrest Focused Plan Amendment Area ...	4.18-15
4.18-4:	Fire Threat Level in Relation to Hillcrest Focused Plan Amendment Area .....	4.18-16
4.18-5:	Fire Hazard Severity Zones in Relation to University Community Plan Update Area ...	4.18-17
4.18-6:	Fire Threat Level in Relation to University Community Plan Update Area.....	4.18-19
8-1:	University CPU High-Density Alternative .....	8-18
8-2:	High-Density Hillcrest Alternative .....	8-19
8-3:	Blueprint SD Distributed Growth Alternative .....	8-32

### TABLES

ES-1:	Summary of Environmental Impacts .....	S-9
2-1:	Existing Land Uses .....	2-14
2-2:	<u>Adopted General Plan Land Uses (as of 2023)</u> <del>Adopted Community Plan Land Uses</del> .....	2-15
2-3:	Blueprint SD Initiative Climate Smart Village Areas Generalized Land Use .....	2-15
2-4:	Uptown Community Plan and Hillcrest FPA Area Existing Land Uses.....	2-17
2-5:	University CPU Area Existing Land Use .....	2-17
3-1:	Residential Buildout – Adopted and Proposed Hillcrest FPA/Uptown Community Plan...	3-27
3-2:	Existing, Adopted, and Proposed Hillcrest FPA/Uptown Community Plan Non-Residential Floor Area.....	3-27
3-3:	Building Height Limits within the CPIOZ Type A – Building Heights Boundary.....	3-50
3-4:	Existing, Adopted, and Proposed University Community Plan Non-Residential Floor Area.....	3-56
3-5:	Residential Buildout – Adopted and Proposed Community Plan .....	3-57
3-6:	<u>University CPU Proposed Bicycle Classifications Modifications</u> .....	3-58
3-7:	<u>University CPU Proposed Street Classifications Modifications</u> .....	3-60
3-8:	Potential Future Approvals Required to Implement the Project .....	3-81
4.3-1:	Vegetation Communities and Land Cover Types.....	4.3-7
4.3-2:	Sensitive Plant Species that Occur or have a Potential to Occur within the Project Areas.....	4.3-24
4.3-3:	Sensitive Wildlife Species with a Potential to Occur within the Project Areas .....	4.3-28
4.3-4:	Potential Wetlands .....	4.3-31
4.4-1:	Recorded Prehistoric Resources within the Climate Smart Village Areas .....	4.4-3
4.4-2:	Recorded Historic Resources within the Climate Smart Village Areas.....	4.4-3
4.4-3:	Recorded Prehistoric Resources within the University CPU Area .....	4.4-4
4.4-4:	Recorded Historic Resources within the <u>University CPU Area-Hillcrest FPA Area</u> .....	4.4-5

## TABLE OF CONTENTS (cont.)

### TABLES (cont.)

4.4-5:	Recorded Historic Resources within the Hillcrest FPA Area.....	4.4-5
4.4-6:	Tier 1 Master Planned Communities.....	4.4-41
4.4-7:	Tiers 2 and 3 Master Planned Residential Communities Proposed for Exemption from Review under SDMC Section 143.0212.....	4.4-41
4.5-1:	SDG&E 2021 Power Mix.....	4.5-2
4.6-1:	City Seismic Safety Study Data in Relation to the Project Areas.....	4.6-18
4.6-2:	Paleontological Monitoring Determination Matrix.....	4.6-24
4.6-3:	Potential Slope Instability within the Blueprint SD Initiative Climate Smart Village Areas.....	4.6-33
4.6-4:	University CPU Area Potential Slope Instability.....	4.6-33
4.7-1:	Greenhouse Gas Emissions Sources in California.....	4.7-2
4.7-2:	City of San Diego GHG Emissions in 2019.....	4.7-2
4.9-1:	Climate Smart Village Area Dam Inundation Area.....	4.9-15
4.10-1:	Airport Noise Contours within the Blueprint SD Initiative Climate Smart Village Areas.....	4.10-18
4.10-2:	Airport Safety Zones within the Project Areas.....	4.10-18
4.10-3:	Noise Contours within the University CPU Area.....	4.10-24
4.10-4:	City of San Diego Land Use – Noise Compatibility Guidelines.....	4.10-38
4.10-5:	Land Use Adjacency Guidelines Summary.....	4.10-52
4.10-6:	Project Consistency with General Plan Elements.....	4.10-65
4.11-1:	Federal Highway Administration Noise Abatement Criteria.....	4.11-7
4.11-2:	Construction Vibration Damage Criteria.....	4.11-7
4.11-3:	Guidelines for Determining the Significance of Groundborne Vibration and Noise Impacts.....	4.11-8
4.11-4:	City of San Diego Property Line Noise Level Limits.....	4.11-13
4.11-5:	Typical Construction Equipment Noise Levels.....	4.11-16
4.11-6:	Trolley Vibration Screening Distances.....	4.11-21
4.12-1:	City of San Diego Planned Fire Stations.....	4.12-7
4.12-2:	City of San Diego Existing Fire Stations.....	4.12-8
4.12-3:	Deployment Measures to Address Future Growth by Population Density per Square Mile.....	4.12-10
4.12-4:	San Diego Fire Department Key Performance Indicators.....	4.12-10
4.12-5:	Existing City of San Diego Police Stations.....	4.12-12
4.12-6:	City of San Diego San Diego Police Department Key Performance Indicators.....	4.12-18
4.12-7:	San Diego Unified School District K-12 Enrollment Figures.....	4.12-19
4.12-8:	Schools Serving the Uptown Community Planning Area.....	4.12-20
4.12-9:	Schools Serving the University CPU Area.....	4.12-21
4.12-10:	City of San Diego Libraries.....	4.12-22
4.12-11:	Library Master Plan – Planning Zones.....	4.12-28
4.12-12:	Deployment Measures to Address Future Growth by Population Clusters.....	4.12-31
4.12-13:	Student Generation Rates from Existing Housing Units by Type in the Uptown Community Planning Area (2020).....	4.12-39

## TABLE OF CONTENTS (cont.)

### TABLES (cont.)

4.12-14: Potential Student Generation from Implementation of the Uptown Community Plan Update (Beyond 2050).....	4.12-40
4.12-15: Student Generation Rates from Existing Housing Units by Type in the University CPU Area (2022).....	4.12-42
4.12-16: Potential Student Generation from Implementation of the University CPU.....	4.12-42
4.13-1: Hillcrest FPA Existing and Planned Parks and Recreation Facilities Community Summary Statistics – 2021 Population .....	4.13-3
4.13-2: University CPU Existing and Planned Parks and Recreation Facilities Community Summary .....	4.13-4
4.14-1: <u>Significance Thresholds for VMT Impacts.....</u>	<u>4.14-11</u>
4.14-2: <u>Base Year VMT Metrics .....</u>	<u>4.14-16</u>
4.14-3: <u>VMT CEQA Analysis for the Blueprint SD Initiative .....</u>	<u>4.14-17</u>
4.14-4: <u>Base Year VMT Metrics – University Community Plan Update .....</u>	<u>4.14-18</u>
4.14-5: <u>Resident and Employee VMT - University Community Plan Update .....</u>	<u>4.14-19</u>
4.14-6: <u>Base Year VMT Metrics – Hillcrest FPA .....</u>	<u>4.14-20</u>
4.14-7: <u>Resident and Employee VMT for Hillcrest Focused Plan Amendment .....</u>	<u>4.14-20</u>
4.18-1: Very High Fire Hazard Severity Zones within the Blueprint SD Initiative Climate Smart Village Area .....	4.18-3
4.18-2: Fire Threat within the Blueprint SD Initiative Climate Smart Village Areas .....	4.18-3
4.18-3: Fire Threat within the Hillcrest FPA.....	4.18-14
4.18-4: University Community Plan Very High Fire Hazard Severity Zones.....	4.18-14
4.18-5: University Community Plan Fire Threat .....	4.18-18
8-1: Alternatives Comparison to the Project .....	8-4
9-1: Mitigation Monitoring and Reporting Program.....	9-2

### APPENDICES (bound under separate cover)

A:	Notice of Preparation and Comments
B:	University Community Plan Historic Context Statement
C:	University Community Plan Area Focused Reconnaissance Survey, December 2022
D:	Biological Resources Report for the University Community Plan Update
E:	Desktop Geotechnical and Geologic Hazard Evaluation University Community Plan Update
F:	Hazardous Materials Technical Study University Community Plan Update
G:	Blueprint San Diego Cultural Resources Analysis
H-1:	Cultural Resources Constraints and Sensitivity Analysis for the University Community Plan Update
H-2:	Draft Hillcrest Focused Plan Amendment LGBTQ+ Historic Context Statement
I-1:	Hillcrest FPA Student Generation Letter
I-2:	University Community Plan Update Student Generation Letter

## **TABLE OF CONTENTS (cont.)**

### **APPENDICES (cont.)**

- J: Blueprint SD Initiative including Blueprint SD General Plan Amendment University Community Plan Update and Hillcrest Focused Plan Amendment Vehicle Miles Traveled Analysis
- K-1: CalEEMod Output – Blueprint – Hypothetical Project #1 Detailed Report
- K-2: CalEEMod Output – Blueprint – Hypothetical Project #2 Detailed Report
- L-1: Request for the Preparation of a Water Supply Assessment for the Hillcrest Focused Plan Amendment
- L-2: Water Supply Assessment Report for the Hillcrest Focused Plan Amendment
- M-1: Request for the Preparation of a Water Supply Assessment for the University Community Plan Update
- M-2: Water Supply Assessment Report for the University Community Plan Update
- N: Making Progress Towards Mode Share Goals Memorandum

## List of Abbreviated Terms

°F	degrees Fahrenheit
2017 Scoping Plan	2017 Climate Change Scoping Plan Update, The Strategy for Achieving California's 2030 Greenhouse Gas Target
2022 Scoping Plan	2022 Scoping Plan Update for Achieving Carbon Neutrality
AAOZ	Airport Approach Overlay Zone
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ACC	Advanced Clean Cars
AFY	acre-feet per year
AIA	Airport Influence Area
Airport Authority	San Diego County Regional Airport Authority
ALUC	Airport Land Use Commission
ALUCOZ	Airport Land Use Compatibility Overlay Zone
ALUCP	Airport Land Use Compatibility Plan
APEFZ	Alquist-Priolo Earthquake Fault Zone
AST	Above ground storage tank
BLC	Boundary Line Correction
BMP	Best Management Practices
BP	Before Present
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire
CalARP	California Accidental Release Prevention Program
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards Code
CalNAGPRA	California Native American Graves Protection and Repatriation Act
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CAP	Climate Action Plan
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CED	California Energy Demand
CEQA	California Environmental Quality Act

CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CIP	Capital Improvement Project
City	City of San Diego
City Council	City of San Diego City Council
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO <sub>2</sub>	carbon dioxide
CoSMoS	Coastal Storm Modeling System
CPIOZ	Community Plan Implementation Overlay Zone
CPRC	California Public Resources Code
CPU	Community Plan Update
CPUC	California Public Utilities Commission
CRHR	California Register of Historic Resources
CTC	California Transportation Commission
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dB(A)	A-weighted decibel
DEH	Department of Environmental Health
DIF	Development Impact Fees
DOT	Department of Transportation
DPM	diesel particulate matter
DTSC	California Department of Toxic Substances Control
DWR	Department of Water Resources
EIR	environmental impact report
Energy Code	California Energy Efficiency Standards for Residential and Nonresidential Buildings
EO	Executive Order
EOC	Emergency Operations Center
EPA	Environmental Protection Agency
ESA	Endangered Species Act
ESL	Environmentally Sensitive Lands
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
Fire Code	2022 California Fire Code
FIRM	Flood Insurance Rate Map
FPA	Focused Plan Amendment
FTA	Federal Transit Authority
General Plan	City of San Diego General Plan



GHG	greenhouse gas
GIS	geographic information system
GWP	global warming potential
H&SC	California Health and Safety Code
Hillcrest FPA	Hillcrest Focused Plan Amendment to the Uptown Community Plan
HMBP	Hazardous Materials Business Plan
HMD	Hazardous Materials Division
HMP	Hydromodification Management Plan
I	Interstate
IBC	International Building Code
IPCC	Intergovernmental Panel on Climate Change
K-12	Kindergarten through 12 <sup>th</sup> Grade
LCFS	Low Carbon Fuel Standard
LCP	Local Coastal Plan
LDC	Land Development Code
LDM	Land Development Manual
L <sub>eq</sub>	hourly equivalent sound level
LEV	low emission vehicle
LEV III	Low Emission Vehicle III Standards
LEV III	Low Emission Vehicle III
LGBTQ+	lesbian, gay, bisexual, transgender, queer
LID	Low Impact Development
LOS	Level of Service
LOSSAN	Los Angeles–San Diego–San Luis Obispo
LRDP	Long-Range Development Plan
LRWRP	Long-Range Water Resources Plan
LTPP	Long-Term Procurement Plan
LUST	leaking underground storage tanks
LWSD	Local Water Supply Development
MBTA	Migratory Bird Treaty Act
MCAS	Marine Corps Air Station
MCL	maximum contaminant level
MGD	million gallons per day
MHPA	Multi-Habitat Planning Area
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MMT CO <sub>2</sub> E	million metric tons of carbon dioxide equivalent
mpg	miles per gallon
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zone
MS4	Municipal Separate Storm Sewer System
MSCP	Multiple Species Conservation Program
MSL	mean sea level
MTS	Metropolitan Transit System

MW	megawatt
MWD	Metropolitan Water District of Southern California
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NAHC	Native American Heritage Commission
NCWRP	North City Water Reclamation Plant
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NO <sub>2</sub>	nitrogen dioxide
NOLF	Naval Outlying Landing Field
NOP	Notice of Preparation
NO <sub>x</sub>	oxides of nitrogen
NPDES	National Pollutant Discharge Elimination System
O <sub>3</sub>	ozone
OES	Office of Emergency Services
OPR	Governor's Office of Planning and Research
OS	Operating System
PAL	Provisionally Accredited Levy
PDO	Planned District Ordinance
PDP	Priority Development Projects
PEIR	Program Environmental Impact Report
PFFP	Public Facilities Financing Plan
PLWTP	Point Loma Wastewater Treatment Plant
PM	particulate matter
PM <sub>10</sub>	particulate matter less than 10 microns in diameter
PM <sub>2.5</sub>	particulate matter less than 2.5 microns in diameter
PRC	Public Resources Code
PUD	Public Utilities Department
PV	photovoltaic
PWD	Public Works Department
RAQS	Regional Air Quality Strategy
RCP	Regional Comprehensive Plan
Regional Plan	San Diego Forward: The 2021 Regional Plan
RES	Regional Energy Strategy
RHNA	Regional Housing Needs Allocation
ROG	reactive organic gas
RPS	Renewable Portfolio Standard
RTP	Regional Transportation Plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SAP	Subarea Plan
SB	Senate Bill
SBWRP	South Bay Water Reclamation Plant

SCIC	South Coastal Information Center
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCRAA	San Diego County Regional Airport Authority
SDCWA	San Diego County Water Authority
SDFD	San Diego Fire-Rescue Department
SDG&E	San Diego Gas & Electric
SDIA	San Diego International Airport
SDMC	San Diego Municipal Code
SDPD	San Diego Police Department
SDR	Supplemental Development Regulations
SDUSD	San Diego Unified School District
SDWA	Safe Drinking Water Act
SFHA	Special Flood Hazard Area
SHMP	State Hazard Mitigation Plan
SIP	State Implementation Plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMART	Sustainable Mobility for Adaptable and Reliable Transportation
SO <sub>2</sub>	sulfur dioxide
SR	State Route
SRA	state responsibility area
SWP	State Water Project
SWPPP	storm water pollution prevention plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TCM	transportation control measures
TMDL	total maximum daily load
TPA	Transit Priority Area
TSS	Threshold Siting Surface
UCSD	University of California, San Diego
UDC	Unified Disaster Council
University CPU	University Community Plan <u>Update</u> and Local Coastal Plan Update
USACE	United States Army Corps of Engineers
USC	United States Code
USEPA	United States Environmental Protection Agency
USFWS	United States Fish and Wildlife Service
UST	underground storage tank
UTC	University Towne Center
UWMP	Urban Water Management Plan
VMT	vehicle miles traveled
VOC	volatile organic compounds
VPHCP	Vernal Pool Habitat Conservation Plan

WMP	Waste Management Plan
WQIP	Water Quality Improvement Plan
WSA	Water Supply Assessment
ZEV	zero emission vehicle

# Executive Summary

This Program Environmental Impact Report (PEIR; State Clearinghouse No. 2021070359) for the proposed Blueprint SD Initiative, Hillcrest Focused Plan Amendment (FPA), and University Community Plan Update (CPU) and associated discretionary actions (collectively referred to throughout this PEIR as the “project” or Blueprint SD Initiative, Hillcrest FPA, and University CPU) has been prepared by the City of San Diego (City) in compliance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code, Section 21000 et seq. and California Code of Regulations, Title 14, Section 15000, et seq.) and in accordance with the City’s CEQA Significance Determination Thresholds (2022).

As described in Section 15168 of the CEQA Guidelines, program-level environmental review documents are appropriate when a project consists of a series of actions related to the issuance of rules, regulations, and other planning criteria. The project that is the subject of this PEIR consists of a comprehensive update to the Blueprint SD Initiative, Hillcrest FPA, and University CPU.

The purpose of this PEIR is intended to inform decision-makers and the public of the potential significant environmental impacts of the project. This PEIR also considers the availability of mitigation measures as required by Section 15100 of the CEQA Guidelines to minimize the project’s significant impacts and evaluates reasonable alternatives to the project that may reduce or avoid one or more significant environmental effects.

## S.1 Project Overview

### S.1.1 Blueprint SD Initiative

The Blueprint SD initiative includes a comprehensive amendment to the General Plan to better align the City of Villages Strategy to reflect the latest goals, policies, and plans for housing, environmental protection, and climate change adaptation and sustainable growth. The Blueprint SD Initiative would amend the General Plan to reflect an updated citywide land use framework designed around the 2050 San Diego Association of Governments (SANDAG) Regional Plan transportation network to promote reductions in per capita greenhouse gas (GHG) emissions and vehicle miles traveled (VMT). The Blueprint SD Initiative identifies complementary land use, transportation, and related policies to support future development according to the revised land use framework. The land use and policy amendments would build upon climate goals outlined in the Climate Action Plan (CAP) and Climate Resilient SD Plan.

The Blueprint SD Initiative land use framework is defined by the Village Climate Goal Propensity Map, which assigns village propensity values ranging from low to high (i.e., 1 through 14) throughout the City. Areas of the City with a medium to high village propensity value (i.e., 7 through 14) are areas where the City would support the redesignation of land uses to increase development capacity, supporting more homes and jobs. The City may support increases in development intensities in other areas of the City provided the overarching goals of the Blueprint SD Initiative would be achieved. Future land use changes would be implemented through future comprehensive

~~CPUs~~community plan updates, specific plans, and/or focused community plan amendments. Future increases in development intensities would support higher density residential and mixed-use development, supporting more homes near transit, especially in areas that contribute to the reduction of per capita VMT and GHG emissions. By aligning housing production with planned transportation investments, the updated citywide land use strategy intends to address the CAP and mobility mode share goals by promoting opportunities to walk/roll, bike, and ride transit. –This updated growth framework would guide future land use changes as part of CPUs, specific plans, and FPAs.

The Blueprint SD Initiative identifies areas for future medium and high-density residential and mixed-use development to support increases in housing and jobs in the City. The Blueprint SD Initiative includes several components evaluated as part of this PEIR, including a comprehensive General Plan Refresh, future plan amendments including CPUs, specific plans, and/or FPAs to align opportunities for additional homes and mixed-use development consistent with the Climate Smart Village Areas in the Village Climate Goal Propensity Map, and future Land Development Code (LDC) updates. Each of these components is described below.

## S.1.2 Hillcrest Focused Plan Amendment

The Hillcrest FPA proposes an amendment to the Uptown Community Plan to redesignate approximately 380 acres of the Hillcrest and Medical Complex neighborhoods with land uses that follow a similar pattern to the planned land uses from the 2016 Uptown CPU with increases to the planned residential density and non-residential development capacity. The amendment would provide the opportunity for additional homes in the Hillcrest FPA area and is intended to encourage active transportation and provide more opportunities for quality public spaces. By providing the opportunity for additional homes near the employment center of the Medical Complex neighborhood, in an area with access to high frequency public transit and coupled with mobility improvements, the Hillcrest FPA would encourage active transportation and reduce automobile trips for work commutes.

Adoption of the Hillcrest FPA would increase the residential unit capacity within the Hillcrest FPA area by approximately 17,218 units compared to the adopted Uptown Community Plan. Compared to the existing units within the Hillcrest FPA area, the Hillcrest FPA could add a total of approximately 29,635 units. Similarly, as detailed in Table 3-2, the Hillcrest FPA would increase the capacity for non-residential floor area by approximately 1,168,800~~37,600~~ square feet. The capacity for office/commercial space would be reduced while capacity for institutional/medical space would increase. The Hillcrest FPA would provide capacity for an additional approximately 1,372,500 square feet of retail commercial space. Additionally, the Hillcrest FPA also includes the adoption of an ordinance for the implementation of the proposed Community Plan Implementation Overlay Zone (CPIOZ) Type A – Hillcrest District; a resolution designating the LGBTQ+ Cultural District; and the designation of the Hillcrest Historic District by the Historical Resources Board.

## S.1.3 University Community Plan

The University CPU is a comprehensive update to the existing University Community Plan. The University CPU establishes an updated vision and objectives that aligns with the General Plan

policies, including those proposed and amended by the Blueprint SD Initiative and City of Villages Strategy, as well as recently adopted policy direction from the ~~Climate Action Plan (CAP)~~, Parks Master Plan, and Climate Resilient SD. The University CPU also takes into consideration the Regional Plan. The University CPU updates the land use plan for the CPU area to help achieve the desired vision and objectives for the community. The University CPU identifies several guiding principles, plan goals and policies, and identifies procedures for plan implementation, as well.

## S.2 PEIR Process

The Notice of Preparation (NOP) was circulated on July 19, 2021, and a scoping meeting was held virtually via Zoom on Thursday, August 5, 2021, from 12:00 PM to 2:00 PM. The NOP circulated for analysis of the project, related letters received, and comments made during the scoping meeting are included as Appendix A of this PEIR. The Draft PEIR was circulated for public review for a period commencing on Thursday, March 14, 2024, through Monday, April 29, 2024. The Draft PEIR and all related appendices have been made available for public review and inspection during the Public Review Period at the City of San Diego's City Planning Department, located at 202 C Street, San Diego, CA 92101, and on the City's webpage at:

- <https://www.sandiego.gov/ceqa/draft>

Copies of the Notice of Availability of the Draft PEIR are also available at all City public library branches.

## S.3 Areas of Controversy

Section 15123(b)(3) of the CEQA Guidelines requires that an environmental impact report address issues to be resolved, including the choice among alternatives and whether or how to mitigate significant impacts. With regard to the project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this PEIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the project override the environmental impacts that cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the project and achieve most of the basic project objectives.

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the PEIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Public comments received during the NOP public review period addressed requests for ~~CAP~~ CAP Climate Action Plan consistency and mode share targets, impacts related to tribal cultural and biological resources, concerns about impacts within the University CPU area, concerns regarding impacts to historic buildings, wildfire concerns, and the need for inclusionary and affordable housing.

## S.4 Project Alternatives

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

Project alternatives are evaluated in further detail in Chapter 8, Alternatives. The evaluations analyze the ability of each alternative to further reduce or avoid the significant environmental effects of the project. Each major issue area included in the impact analysis of this PEIR has been given consideration in the alternatives analysis. This PEIR evaluates four alternatives to the project: Alternative 1: No Project Alternative, Alternative 2: University ~~CPU~~Community Plan Update and Hillcrest ~~FPA~~Focused Plan Amendment High Density Alternative, Alternative 3: Blueprint SD Initiative Distributed Growth Alternative, and Alternative 4: ~~Blueprint SD Initiative~~ Reduced Density Alternative.

### S.4.1 Alternative 1: No Project Alternative

The No Project Alternative would not, to the same extent as the project, plan for land uses that maximize the opportunity for housing near existing and future transit stations and stops identified in the SANDAG Regional Plan and that allow residents, employees, students, and visitors to more safely, conveniently, and enjoyably travel by walking/rolling, biking, or transit in line with the CAP. Although the No Project Alternative would allow for development consistent with existing community plans and zoning, this alternative would not plan for the transit-oriented jobs and housing capacity needed to support long-term GHG reduction initiatives including a transition to non-vehicular forms of travel within Climate Smart Village Areas and would not support higher densities in proximity to transit to the same extent. This alternative would not assist with achieving the housing needed to meet the City’s Regional Housing Needs Assessment targets to the same extent as the project because increases in residential development capacity would not be provided to the same degree as the project in areas where the City is incentivizing growth (e.g. within SDAs and TPAs where the City supports housing streamlining). Planning for higher densities in Climate Smart Village Areas, as the project does, increases the development capacity of the City, which would assist the City in meeting its Regional Housing Needs Assessment targets, as the higher residential development capacity increases the likelihood of more homes per development project.

The No Project Alternative would do nothing to strengthen the University community’s role as a major employment center in the City by co-locating biotech and life sciences laboratories with the area’s hospitals and other technological offices to create an innovation hub that serves the region. The No Project Alternative would also do nothing to increase affordable housing near biotech jobs and the University of California, San Diego to retain talent within the City and prevent employees and students from leaving the community due to high housing costs and long commute times.



The No Project Alternative would not establish and enhance the cultural significance of the Hillcrest FPA area to honor and recognize Hillcrest's role as the historic center of the City's lesbian, gay, bisexual, transgender, queer community, no would it provide opportunities to increase and enhance transportation options, in particular, active transportation networks within the Hillcrest FPA area to create a walkable and active street network.

The No Project Alternative would result in reduced impacts compared to the project for the issues of aesthetics, air quality,- noise, and water quality. However, impacts of the No Project Alternative would be greater than the project for the issues of land use, energy, GHG emissions, and transportation. Overall, the No Project Alternative would achieve the policy objectives of the City's CAP and City of Villages strategy to a lesser extent than the project.

The No Project Alternative would not, to the same extent as the project, plan for land uses that maximize the opportunity for housing near in areas that would support a shift in mode share toward more active transportation aligning with the City's Climate Action Plan goals and supporting planned San Diego Association of Governments (SANDAG) transportation investments. Although the No Project Alternative would allow for development consistent with existing community plans and zoning, this alternative would provide for increases in allowable residential and mixed-use development intensities within Climate Smart Village areas and would not support transit-oriented jobs and housing capacity needed to support long-term GHG reduction initiatives. This alternative would not assist with achieving the housing needed to meet the City's Regional Housing Needs Assessment (RHNA) targets to the same extent. Overall, the No Project Alternative would achieve the policy objectives of the City's CAP and City of Villages strategy to a lesser extent than the project.

## **S.4.2 ~~Alternative 2: University Community Plan Update and Hillcrest Focused Plan Amendment High Density Alternative~~**

The University CPU and Hillcrest FPA High Density Alternative is a land use alternative that would result in greater non-residential and residential development capacity within areas throughout the City with a village propensity value between 10 and 14, and would result in greater non-residential and residential development capacity in the Hillcrest FPA area and the University Towne Centre and Campus/Nobel districts within the University CPU area. Throughout the areas of the City that have a village propensity value of 10 through 14 as defined by the Village Climate Goal Propensity Map, increases in residential and non-residential development intensities would be achieved through corresponding changes to the base zone development regulations contained in the Municipal Code such as allowing for additional height and Floor Area Ratio (FAR). As the Blueprint SD Initiative provides a planning framework to direct future growth, this alternative would result in a similar planning framework, but would also remove barriers to achieving the highest density uses in these areas through future amendments to the base zone regulations concurrent with future community plan updates. This alternative is expected to remove additional barriers to achieving density within these areas, but would also be expected to result in taller buildings with the potential for additional massing compared to the project.

Development potential within the University CPU area and Hillcrest FPA area would increase under this alternative. Compared to the University CPU's proposed increase in non-residential development capacity, this alternative would accommodate approximately six million more square feet of non residential build-out capacity in the University CPU area. Similarly, residential capacity under this alternative would increase, accommodating up to an additional 26,000 new homes compared to the proposed University CPU. these two planning areas. The Blueprint SD Initiative would remain the same as in the project for this alternative. Compared to the University CPU's proposed increase in non-residential development capacity, this alternative would accommodate approximately six million more square feet of nonresidential build-out capacity in the University CPU area. Similarly, residential capacity under this alternative would increase, accommodating up to an additional 26,000 new homes compared to the proposed University CPU. Under this alternative, the central core of the University community would include higher density ranges, allowing up to 290 dwelling units per acre within the highest intensity Urban Village designation. This alternative would seek to maximize density in proximity to the Executive Trolley Station, Nobel Trolley Station, and the University Towne Center Transit Center. Refer to Figure 8-1 for a depiction of the University component of this alternative.

Under this alternative, the Hillcrest FPA area would also be designated with higher intensity residential and commercial land use intensities. Refer to Figure 8-2 for a depiction of the proposed land uses that would apply within the Hillcrest FPA. This alternative would accommodate up to approximately 1,000 additional residential dwellings within the Hillcrest FPA, ~~beyond the 52,818 residential units proposed by the plan.~~ This alternative would include additional homes expanding further along University Avenue at 290 dwelling units per acre and in areas surrounding the central core within the Commercial and Entertainment Activity Boundary. This alternative would seek to maximize density in proximity to the central core to create a walkable, ~~and dense, and transit-oriented~~ environment.

Multiple climate action, housing, bicycle, and public transportation advocacy groups requested that the City analyze a higher density alternative for the University CPU. This alternative includes higher density for not only the University CPU, but also the Blueprint SD Initiative and the Hillcrest FPA. It was selected for consideration as it is feasible, has the potential to reduce significant impacts, and would achieve ~~obtain~~ most of the project objectives.

### **S.4.3 Alternative 3: Blueprint SD Initiative Distributed Growth Alternative**

Under this alternative, the General Plan Land Use and Community Planning Element Figure LU-1 would be amended to support growth within areas with a village propensity value of 4 and above (see Figure ~~83-31~~). Additional areas throughout the City would be targeted for residential and mixed-use growth, including areas with a lower propensity for alternative modes of transportation such as walking/rolling, biking, and transit. While this alternative would not implement a land use framework that accounts for the SANDAG Regional Plan transportation network to the same degree as the project and would not achieve CAP mode share goals to the same degree, the alternative would distribute density more broadly in the City, resulting in more distributed development intensities ~~lower intensity development~~ and reduced building heights within areas with a Village Climate Goal Propensity Value between 7 through 14. The same overall growth projections are assumed under

this alternative, but they would be achieved in a more distributed manner. In other words, this alternative would plan for more growth in areas with a village propensity value of 4 through 6 and for lower development maximums within areas with a village propensity value of 7 through 14. Thus, under this alternative, residential and commercial development intensity would be more distributed throughout the City, rather than being focused within levels 7 through 14 where development would most effectively support shifts in mode share toward walking, transit, and bicycling. The University CPU and Hillcrest FPA proposed land use and policy framework would remain the same as in the proposed project in this alternative.

The Blueprint SD Initiative Distributed Growth Alternative would accommodate the same amount of growth as the project, but it would occur in a more distributed manner throughout the City. This alternative would not achieve the mode share goals of the CAP to the same degree as the project, and would result in reduced consistency with the General Plan and the CAP. This alternative would distribute growth more widely in areas of the City with less propensity for walking/rolling, bicycling and transit, this could conflict with various General Plan land use and mobility plans and policies that aim to support densification in areas that would achieve associated VMT efficiencies.

#### **S.4.4 ~~Blueprint SD Initiative~~ Reduced Density Alternative**

Under this alternative, the General Plan Land Use and Community Planning Element Figure LU-1 would be amended to reduce the overall density allowances within the Climate Smart Village Areas. Density would still be focused within areas with a village propensity value of 7 and above, but maximum density ranges would be reduced. This alternative would similarly result in reduced densities within both the University CPU and Hillcrest FPA. Within the University CPU, this alternative would result in reduced non-residential and residential development capacity. Due to lower density and intensity uses, including a maximum of 145 dwelling units per acre within the Urban Village designation. Within the University Towne Centre district, the project designates most of the area as Urban Employment Village High-3 (0-218 du/ac, FAR up to 7.0), while this alternative would designate the area as Urban Village High-2 (0-145 du/ac, FAR up to 5.0). Within the Nobel/Campus district, areas to the west of Interstate 5 are designated by the project as Urban Employment Village High-2 (0-145 du/ac, FAR up to 5.0) are designated as Community Village (0-109 du/ac) by this alternative, and areas east of Interstate 5 are designated by the project as Urban Village High-1 (0-109 du/ac, FAR up to 3.0) are designated as Medium-High Density Residential (30-44 du/ac) and High Density Residential (45-73 du/ac) by this alternative. Residential capacity under this alternative would allow approximately 22,000 new homes and approximately 55,000 new jobs.

Within the Hillcrest FPA area, this alternative would allow for reduced residential development capacity, allowing a maximum of up to 218 dwelling units per acre within the Community Commercial designation and maximum of up to 109 dwelling units per acres within the Residential Very High designation. Residential capacity within the Hillcrest FPA area under this alternative would allow approximately 14,106 new homes and non-residential capacity of approximately 1,037,600 square feet.

Under this alternative, future CPUs planned pursuant to the Blueprint SD Initiative would set densities consistent with the reduced densities outlined above for the University CPU and Hillcrest

FPA. The number of homes and FAR would be reduced at a level similar to the reductions in the two plans.

This alternative would implement a land use framework consistent with the SANDAG Regional Plan transportation network, but it would not achieve CAP mode share goals to the same degree, due to reduced densities that would be less supportive to expanded transit investments. This alternative would likely result in an overall lower scale of development including reduced building heights within -Climate Smart Village Areas, resulting in reduced impacts related to aesthetics, but still significant like the project. Overall growth projections -under this alternative would be reduced compared to the project.

The University Community Planning Group requested that the City analyze a reduced density alternative for the University CPU. This alternative includes reduced density for not only the University CPU, but also the Blueprint SD Initiative and the Hillcrest FPA. It was selected for consideration as it is feasible, has the potential to reduce significant impacts, would obtain most of the project objectives, and is reasonable and realistic. This alternative would implement a land use framework consistent with the SANDAG Regional Plan transportation network, it would not achieve CAP mode share goals to the same degree, due to reduced densities that would be less supportive to expanded transit investments. This alternative would likely result in an overall lower scale of development including reduced building heights within areas with Climate Smart Village Areas. Overall growth projections assumed under this alternative would be reduced compared to the project.

## **S.5 Summary of Environmental Impacts and Significance Conclusions**

Table ES-1 summarizes the conclusions of the environmental analysis of this PEIR. Impacts are identified as significant or less than significant. As detailed within Chapter 4.0, the project is designed to be self-mitigating to the extent feasible through application of existing regulations in addition to application of design features incorporated into the project.

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<b>4.1 Aesthetics</b>		
<p>Issue 1</p> <p>Would the project have a substantial adverse effect on a scenic vista?</p>	<p>Implementation of the project is anticipated to result in areas of increased density, intensity, and building heights which could adversely affect scenic vistas from public viewing locations. The design of future development, including building mass, heights, and intensity, would be subject to the existing regulatory framework including, <u>but not limited to, urban design policies of the applicable Community Plan or FPA, City base zoning regulations and all applicable SDRs at the time the development is proposed, which would reduce potential impacts to scenic vistas. Additionally, the Blueprint SD Initiative, Hillcrest FPA, and University CPU provide a range of policies that address the relationship between development and scenic views. Future projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies and</u> adherence to these policies would further minimize potential impacts to scenic vistas. Nevertheless, at this programmatic level of review, and without project-specific development plans, impacts associated with scenic vistas and viewsheds would be significant.</p>	<p>Significant</p>
<p>Issue 2</p> <p>Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?</p>	<p>Development associated with the project is not anticipated to substantially damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. However, future development could impact scenic views or vistas from a designated or eligible scenic highway in the City.</p> <p>As stated above, future development would not be visible from the designated scenic portion of SR-163 due to topography, and the majority of the designated portion of SR-52 is within the Mission Trails Open Space area. <u>The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, impacts associated with future development are more likely to be concentrated in these areas.</u> The Village Climate Goal Propensity Map does not identify potential Climate Smart Village Areas in proximity to the designated scenic portion of SR-52. However, the boundaries of future Climate Smart Village Areas could shift as the regional transportation network is updated, and future development could occur within the scenic viewshed of this scenic route. Currently eligible scenic routes</p>	<p>Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
	<p>could also be designated in the future and development per the Blueprint SD Initiative could be within the potential scenic viewshed of these scenic routes. Therefore, at this programmatic level of analysis without site-specific plans, impacts to scenic views or vistas from a state-designated highway would be significant.</p> <p>Although there are no designated state scenic highways in the Hillcrest FPA area and the University CPU area, there are eligible scenic routes (i.e., SR-163 from Ash Street to I-8 and SR-52 east of La Jolla to SR-67 near the City of Santee) in proximity to these areas which could be designated in the future. If these routes are officially designated in the future, future development in accordance with the Hillcrest FPA and University CPU could impact scenic resources that are visible from these scenic highways. Therefore, at this programmatic level of review without site-specific plans, impacts <del>would be considered significant</del> would be significant.</p>	
<p>Issues 3 and 4</p> <p>Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point).</p> <p>Would the project conflict with applicable zoning and other regulations governing scenic quality?</p>	<p>Compliance with City's regulations, development standards, urban design policies, and any SDRs proposed as part of the project and as part of future CPUs, Specific Plans, and FPAs would ensure that development under the project would not substantially alter the existing visual character, quality of public views, or scenic quality of the project areas. Future projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which could identify additional project features and/or mitigation measures to address potential impacts. Nevertheless, at this programmatic level of review, and without project-specific development plans, impacts associated with visual character, quality of public views, and scenic quality would be significant.</p>	<p>Significant</p>
<p>Issue 5</p> <p>Would the project create a new source of substantial light, glare, or shade which would adversely affect the area?</p>	<p>Required compliance with the SDMC would ensure impacts relative to lighting and glare would be less than significant. Future development <u>and potential deviation as identified in the City's LDC</u> is anticipated to result in areas of increased density, intensity, and building heights which could create new sources of shade in the project areas. Impacts associated with shade would be significant.</p>	<p>Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<b>4.2 Air Quality</b>		
<p>Issue 1</p> <p>Would the proposed project conflict with or obstruct the implementation of the applicable air quality plan?</p>	<p>Implementation of the University CPU and Hillcrest FPA would result in greater density; therefore, future emissions associated with buildout of the FPA and the CPU areas would be greater than future emissions associated with buildout of the adopted Community Plan land uses. Additionally, if land uses increase in other areas of the City as a result of implementation of the Village Climate Goal Propensity map, impacts of those future land use amendments would be significant. Thus, emissions of ozone precursors (VOC and NOx) would be greater than what is accounted for in the RAQs and impacts would be significant.</p>	<p>Significant</p>
<p>Issue 2</p> <p>Would the proposed project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?</p>	<p>The project includes planning level actions that do not propose any physical development at this time. Adoption of the Blueprint SD Initiative, the University CPU, Hillcrest FPA, future LDC amendments, CPUs, and plan amendments would not result in impacts related to air quality standards during construction or operation because they are not associated with any physical development. However, project implementation anticipates future development would occur consistent with adopted planning documents and LDC amendments. Future development projects would involve construction and operational emissions, which could exceed air quality standards. Therefore, at a program level of review impacts would be significant.</p>	<p>Significant after Mitigation</p>
<p>Issue 3</p> <p>Would the proposed project expose sensitive receptors to substantial pollutant concentrations?</p>	<p>Impacts associated with the exposure of sensitive receptors to carbon monoxide hot spots and toxic air emissions resulting from construction would be less than significant. Future development of residential land uses consistent with the Blueprint SD Initiative, the Hillcrest FPA, and University CPU would not be sources of stationary or mobile source TACs; therefore, impacts related to these land uses would be less than significant. However, future development of light industrial land uses or commercial land uses that involve stationary source emissions could result in significant impact to sensitive receptors. Additionally, future development within industrial designated areas within the University CPU area, in addition to other areas of the City where land uses such as heavy industrial, warehousing, and distribution could affect sensitive receptors due to mobile source diesel emissions, would result in a significant impacts to sensitive receptors due to mobile source TAC.</p>	<p>Significant after Mitigation</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 4</p> <p>Would the proposed project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?</p>	<p>Impacts associated with the exposure of sensitive receptors to substantial odors would be significant at a program level of review.</p>	<p>Significant after Mitigation</p>
<p><b>4.3 Biological Resources</b></p>		
<p>Issue 1</p> <p>Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP, VPHCP, or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p>	<p>Future development projects consistent with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU may <u>have</u> the potential to impact sensitive plant and wildlife species either directly through the loss of habitat (including critical habitat) and/or direct take, or indirectly by placing development in or adjacent to sensitive habitat. Potential impacts to federal- or state listed species, MSCP Covered Species, Narrow Endemic Species, plant species with a CNPS Rare Plant Rank of 1 or 2, and wildlife species included on the CDFW's Special Animals List would be significant. Potential impacts to birds covered by the Migratory Bird Treaty Act would be avoided by adherence to the requirements of this law. However, at a program level of review it cannot be ensured that all impacts could be feasibly reduced to less than significant; therefore, impacts to sensitive species <del>would be considered significant</del> <u>would be significant</u>.</p>	<p>Significant after Mitigation</p>
<p>Issue 2</p> <p>Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?</p>	<p>Future development projects consistent with the Blueprint SD Initiative, the Hillcrest FPA-, and the University CPU could potentially have an impact on sensitive upland (Tier I, Tier II, Tier IIIA, and Tier IIIB) habitat that is present within the project areas. Development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to be focused within developed urban areas that have been previously disturbed and have existing commercial, industrial, residential, or employment uses; however, some project areas could support sensitive habitats. All future development including ministerial and discretionary projects would be reviewed for consistency with the City's ESL regulations and if any ESL is present, a discretionary Site Development Permit or Neighborhood Development Permit would be required including an environmental review process that requires analysis demonstrating compliance with the City's ESL Regulations, Biology Guidelines, MSCP SAP and VPHCP. Sensitive habitat in the project areas is concentrated</p>	<p>Significant after Mitigation</p>



**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
	<p>in the MHPA, which are conservation lands with limited potential for disturbance as regulated by the City's ESL regulations, Biology Guidelines, MSCP SAP and VPHCP. However, development may occur within the MHPA subject to a Boundary Line Adjustment or BLC. Additionally, development may occur within non-MHPA sensitive habitats. At a program level of review, impacts to sensitive habitats <del>would be considered significant</del>would be significant.</p>	
<p>Issue 3 Would the project have substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?</p>	<p>Future development projects consistent with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU could potentially have an impact on wetlands or other jurisdictional wetland areas that are present within the project areas. Wetlands impacts are regulated by the City in accordance with the City's Biology Guidelines, ESL Regulations, VPHCP, and MSCP SAP. Additionally, impacts to jurisdictional features would be subject to regulation by the U.S. Army Corps of Engineers in accordance with Section 404 of the CWA, the RWQCB in accordance with Section 401 of the CWA, <u>and</u> the CDFW under Section 1600 of the California Fish and Game Code, as applicable. Although wetlands in the project areas are concentrated in the MHPA, including canyons, and creeks, since site-specific future development is unknown at this time, there is a potential that wetlands could be affected. Implementation of the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPCHP would ensure impacts to wetlands would be avoided, <u>minimized, and mitigated</u> to the extent feasible and a wetland buffer provided around all wetlands as appropriate to protect the functions and values of the wetland (City of San Diego 2018). Implementation of the existing regulatory framework would reduce potential impacts to wetlands during project level reviews. However, at a program level of review without site-specific plans available for review, it cannot be ensured that all impacts to wetlands would be mitigated to a less than significant level. Thus, impacts to wetlands <del>would be considered significant</del>would be significant.</p>	<p>Significant after Mitigation</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 4</p> <p>Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?</p>	<p>Regional and local wildlife corridors are not located within the project areas due to their location within open space and MHPA lands. No Open Space land use designation would <del>not</del> be changed by the proposed plans. Future development projects consistent with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would undergo environmental review to determine potential impacts on wildlife corridors, and impacts would be mitigated in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP and VPHCP. Due to the anticipated location of development being concentrated in already developed or urban areas combined with the City's regulatory framework that protects conservation areas and sensitive habitats, the project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, nor would the project impede the use of native wildlife nursery sites. Impacts would therefore be less than significant.</p>	<p><del>Significant</del> <u>Less than Significant</u> <del>after Mitigation</del></p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 5</p> <p>Would the project conflict with the provisions of the MSCP, VPHCP, other an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, such as introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects or introduce invasive species of plants into a natural open space area?</p>	<p>Future development projects consistent with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be subject to compliance with applicable current and future local, state, and federal policies, guidelines, directives, and regulations, including but not limited to, the state and federal ESA, the San Diego County MSCP, the City's ESL Regulations, Biology Guidelines, and <del>the City's MSCP SAP</del>, and VPHCP. Analysis related to consistency with conservation plans is included in Section 4.10.4. Revisions to the General Plan Conservation Element, Hillcrest FPA, and the University CPU, incorporate updated policies to support implementation of the City's MSCP SAP and VPHCP and include policies aimed at resource protection and preservation of the MHPA and open space. Future development within the project areas would be evaluated for compliance with the City's MSCP SAP, VPHCP, Biology Guidelines, ESL Regulations, in addition to applicable policies. Project specific requirements and necessary avoidance and mitigation measures would be determined at the project level. Adherence to the City regulatory framework would avoid future significant impacts. Therefore, the project would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP SAP area or in the surrounding region. Impacts would therefore be less than significant.</p>	<p><del>Significant</del> <u>Less than Significant after Mitigation</u></p>
<p><b>4.4 Cultural Resources</b></p>		
<p>Issue 1</p> <p>Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?</p>	<p>While the SDMC provides for the regulation and protection of designated and potential historical resources, ensuring mitigation is implemented to reduce impacts to the maximum extent practicable, at a program level of review it is not possible to ensure the successful preservation of all historic built environment resources, objects, and sites within the project areas. Thus, at a program level of review, potential impacts to historical resources <del>would be considered significant</del> <u>would be significant</u>.</p>	<p>Significant after Mitigation</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 2</p> <p>Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?</p>	<p>While existing regulations and the SDMC would provide for the regulation and protection of archaeological resources, it is impossible to ensure the successful preservation of all archaeological resources. Therefore, potential impacts to archaeological resources <del>would be considered significant</del> <u>would be significant</u>.</p>	<p>Significant after Mitigation</p>
<p>Issue 3</p> <p>Would the project disturb any human remains, including those interred outside of dedicated cemeteries?</p>	<p>The California H&amp;SC provides a process and requirements for the identification and repatriation of collections of human remains or cultural items. With implementation of local, state, and federal regulations, impacts to human remains would be less than significant.</p>	<p>Less than Significant</p>
<b>4.5 Energy</b>		
<p>Issue 1</p> <p>Would the project result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?</p>	<p>Construction of development facilitated by the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would not result in the use of excessive amounts of fuel or other forms of energy and impacts would be less than significant.</p> <p>Long-term implementation of the project would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of energy as it would place development in areas with good access to transit and would encourage alternative transportation use. Impacts would be less than significant.</p> <p><u>Future development</u> facilitated by the implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during operations as new development would be required to meet the mandatory energy requirements of CALGreen and the Energy Code. Impacts would be less than significant.</p>	<p>Less than Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 2</p> <p>Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?</p>	<p>Future projects would be subject to existing building and energy code regulations in place at the time they are implemented. Additionally, the Blueprint SD Initiative, Hillcrest FPA, and University CPU include robust policy frameworks which support the development of a sustainable and efficient land use pattern and mobility system, encourage sustainable design that is energy efficient, and promote renewable energy use. Development facilitated by the implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would not conflict with any state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.</p>	<p>Less than Significant</p>
<p><b>4.6 Geology and Soils</b></p>		
<p>Issue 1</p> <p>Would the project expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, or similar hazards?</p>	<p>Implementation of the project would not have direct or indirect significant environmental impacts to seismic hazards because future development would be required to comply with the SDMC and CBC. This regulatory framework includes a requirement for site-specific geotechnical investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of a specific development project. Adherence to the SDMC grading regulations and construction requirements and implementation of recommendations contained within required site-specific geotechnical studies would preclude significant impacts related to geologic hazards. Thus, impacts would be less than significant.</p>	<p>Less than Significant</p>
<p>Issue 2</p> <p>Would the project result in a substantial increase in wind or water erosion of soils, either on or off the site?</p>	<p>Implementation of the project would result in less than significant impacts related to soil erosion and loss of topsoil. SDMC regulations prohibit sediment and pollutants from leaving the worksite and require the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures. Conformance to mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Thus, impacts would be less than significant.</p>	<p>Less than Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 3</p> <p>Would the project be located in a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?</p>	<p>Future development within the project areas would be required to be constructed in accordance with the SDMC and CBC and would be required to prepare a site-specific geotechnical report and implement any recommendations within the report. Thus, impacts related to landslides, lateral spreading, subsidence, liquefaction, or collapsible or expansive soils would be less than significant.</p>	<p>Less than Significant</p>
<p>Issue 4</p> <p>Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?</p>	<p>Required compliance with SDMC Section 142.0151 would ensure paleontological monitoring is required during grading in accordance with the General Grading Guidelines for Paleontological Resources in the City's Land Development Manual. With implementation of these SDMC requirements during grading, impacts to paleontological resources and unique geologic features would be less than significant.</p>	<p>Less than Significant</p>
<p><b>4.7 Greenhouse Gases</b></p>		
<p>Issue 1</p> <p>Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?</p>	<p>Future development under the project would not conflict with implementation of the CAP, as it would be consistent with the CAP's goal of focusing new development in areas that would allow residents, employees, and visitors to safely, conveniently, and enjoyably travel as a pedestrian, or by biking, or transit, such as in Transit Priority Areas, and areas of the City that support existing or planned transit. Therefore, the project is intended to support the City in achieving CAP goals, specifically mode share goals, by supporting and incentivizing future development within high village propensity areas to support development in areas that have a propensity for walking/rolling, bicycling and transit use, supporting citywide VMT efficiency. The project would support the City in obtaining citywide GHG emissions reduction targets under the CAP. Impacts related to GHG emissions would be less than significant.</p>	<p>Less than Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 2</p> <p>Would the project conflict with the City's Climate Action Plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?</p>	<p>Future development under the project would be consistent with state plans, SANDAG's Regional Plan, the City's General Plan, and the City's CAP. Impacts associated with applicable GHG emission reduction plans would be less than significant.</p>	<p>Less than Significant</p>
<p><b>4.8 Hazards and Hazardous Materials</b></p>		
<p>Issue 1</p> <p>Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?</p>	<p>Although future development and construction activities associated with development contemplated by the project could involve the transport, use, or disposal of hazardous materials, compliance with applicable federal, state, and local regulations would ensure that regulated hazardous materials are handled and disposed of properly. Operation of future development could use small amounts of hazardous materials for cleaning and maintenance; however, hazardous materials and waste would be managed and used in accordance with all applicable federal, state, and local laws and regulations, which would ensure that no hazards would result during long-term operation of the project. The project would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.</p>	<p>Less than Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 3</p> <p>Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within a quarter-mile of an existing or proposed school?</p>	<p>The project would not, on its own accord, increase the likelihood that hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste would occur near schools compared to baseline conditions. Future development implemented in accordance with the project would be subject to applicable regulations and industry and code standards and requirements related to hazardous emissions and the handling of hazardous materials, including as they relate to proximity to schools. For any new schools that could be constructed within 0.25 mile of a facility that emits hazardous emissions or handles hazardous or acutely hazardous materials, substances, or waste, the school district or private school entities would be responsible for planning, siting, building, and operating the schools. It would be the responsibility of the school district to perform an in-depth analysis of any potential hazards at the project level. Additionally, pursuant to Public Resources Code Section 21151.4, an EIR shall not be certified nor shall an ND be approved for any project involving the construction or alteration of a facility that emits hazardous emissions or handles extremely hazardous substances within a quarter mile of a school unless the lead agency preparing the EIR or ND has consulted with the school district having jurisdiction over the school, and the school district has been given written notification of the project at least 30 days prior to the proposed certification of the EIR or approval of the ND. Therefore, impacts to schools from hazardous materials or handling hazardous or acutely hazardous materials, substances, or waste would be less than significant.</p>	<p>Less than Significant</p>



**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issues 2 and 4</p> <p>Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?</p> <p>Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or environment?</p>	<p>In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at a contaminated site until a “no further action” clearance letter from the County’s DEHQ, or a similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency. Therefore, impacts related to hazardous materials sites would be less than significant.</p>	<p>Less than Significant</p>
<p>Issue 5</p> <p>Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?</p>	<p>The project does not include any goals or objectives that would interfere or diminish the capacity of existing programs and facilities to provide effective emergency response or allow for sufficient emergency evacuation in the project areas. <del>The project includes Existing City policies which are in place supporting</del> effective emergency evacuation and would also improve circulation and mobility in the project area for all modes, including emergency vehicles, and dedicated roadway space for transit would also be available for emergency vehicle use. Additionally, future development under the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be primarily located within areas proximate to major transportation corridors that serve as emergency evacuation routes. Impacts related to emergency response associated with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be less than significant.</p>	<p>Less than Significant</p>
<p><b>4.9 Hydrology</b></p>		
<p>Issue 1</p> <p>Would the project substantially decrease groundwater supplies or</p>	<p>New development occurring within the project areas would be required to implement onsite LID BMPs into the design of future projects within the project areas to address the potential for transport of pollutants of concern through either detention/retention or infiltration, consistent with the requirements of the MS4 Permit issued by the San Diego</p>	<p>Less than Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?</p>	<p>RWQCB, and the City's Stormwater Standards Manual and Drainage Design Manual. Implementation of LID BMP design elements would reduce the amount of pollutants transported from the project areas to receiving waters. Thus, through compliance with the existing regulatory framework addressing protection of water quality, impacts would be less than significant.</p>	
<p>Issue 2</p> <p>Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:</p> <ul style="list-style-type: none"> <li>a) Result in substantial erosion or siltation on- or off-site?</li> <li>b) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?</li> <li>c) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?</li> <li>d) Impede or redirect flood flows?</li> </ul>	<p>Future projects would be required to comply with the City's drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual, ESL Regulations protecting floodplains, FEMA standards, and the City's Stormwater Standards Manual which would ensure development is designed to avoid drainage impacts due to erosion and siltation, surface run-off, stormwater drainage systems, and flood flows; therefore, impacts would be less than significant.</p>	<p>Less than Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 3</p> <p>Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?</p>	<p>Impacts related to pollutant release resulting from inundation within the project areas are anticipated to be less than significant for most areas due to required compliance with applicable SDMC and FEMA regulations that require protection from flooding. Future development would be required to conform to the City's Flood Mitigation Plan and the SDMC for Development Regulations for SFHAs (Section 143.0145 and 143.0146) which would ensure flood hazards and the corresponding risk of release of pollutants due to inundation are minimized. However, due to portions of the Climate Smart Village Areas being located within the Mission Valley Community Plan area which is designated Zone X with a PAL note, impacts related to development behind the PAL area are considered significant due to the level of uncertainty regarding this potential flooding impact. Within the University CPU area, while there are no PALs, there are areas subject to existing flooding; therefore, at a program level of review impacts related to flooding in University CPU and Blueprint SD Initiative project areas are considered significant. Impacts related to flooding in the Hillcrest FPA area would be less than significant due to no flood hazard zones being present.</p>	<p>Significant</p>
<p><b>4.10 Land Use and Planning</b></p>		
<p>Issue 1 Would the project physically divide an established community?</p>	<p>Overall policy changes related to mobility are intended to support community accessibility and connectivity by all. Implementation of the proposed planning and policy framework defined by the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA, would avoid physical division of community. Impacts would be less than significant.</p>	<p>Less than Significant</p>
<p>Issue 2 Would the project cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?</p>	<p>Implementation of Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would be consistent with the City's overarching policy and regulatory documents including the General Plan and SDMC. Additionally, updates to mobility policies would help achieve consistency with the Regional Plan. The Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would be consistent with applicable environmental goals, objectives, or guidelines of the SANDAG Regional Plan, the General Plan and General Plan Noise Element, Environmentally Sensitive Lands Regulations, California Coastal Act, the MSCP SAP, the VPHCP, CAP, HRR, ALUCPs, and affordable housing regulations. Therefore, impacts would be less than significant.</p>	<p>Less than Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 3 Would the project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?</p>	<p>As the proposed actions are planning and policy level actions, no deviations or variances are proposed. However, future development consistent with the proposed plans may propose deviations or variances. If findings cannot be supported by the City, the deviation or variance would not be approved. Similarly, the City may approve waivers and/or incentives under the Affordable Housing Regulations. Therefore, with application of the City's LDC that require specified findings to be made prior to approval of any deviation or variance, impacts resulting from <u>potential</u> deviations or variances associated with future development anticipated by the project, <u>including affordable housing within the University CPU consistent with SDR-J-1</u>, would be less than significant.</p>	<p>Less than Significant</p>
<p><b>4.11 Noise</b></p>		
<p>Issue 1</p> <p>Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?</p>	<p><b>a. Construction Noise</b></p> <p>Construction activities related to implementation of the project would potentially generate short-term noise levels in excess of 75 dB(A) <math>L_{eq}</math> at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of its Noise Abatement and Control Ordinance, it is possible that some construction activities could exceed 75 dB(A) <math>L_{eq}</math>. <u>However, without site-specific development details, such as the extent of construction activities and construction equipment being utilized, it is not possible to analyze noise impacts at a programmatic level of review.</u> Therefore, impacts associated with construction noise would remain potentially significant.</p> <p><b>b. Non-Transportation Noise Increases</b></p> <p>The project areas would contain residential and commercial interfaces. Other land use interfaces may be present throughout the project areas including residential near industrial uses. Mixed-use areas where residential uses are located in proximity to commercial sites could expose sensitive receptors to noise above allowable levels. While it is not anticipated that stationary sources associated with multi-family residential land uses located within the project areas would result in noise exceeding property line limits, at a programmatic level of review, <u>and without site-specific development details</u>, it cannot be ensured that all development would be able to meet property line noise limitations. The City's Noise Ordinance property line standards would apply to all future development consistent with the Blueprint SD Initiative, Hillcrest FPA, and Hillcrest FPA. Although</p>	<p><b>A. Construction Noise</b></p> <p>Significant after Mitigation</p> <p><b>b. Non-Transportation Noise Increases</b></p> <p>Significant after Mitigation</p> <p><b>c. Traffic-Related Noise</b></p> <p>Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
	<p>enforcement mechanisms for the violation of noise regulations in the Noise Abatement and Control Ordinance would provide for the correction of potential noise exceedances, impacts would remain potentially significant.</p> <p><b>c. Traffic-Related Noise</b></p> <p>Future development within the project areas could result in increases in transportation noise and could have the potential to increase the exposure of sensitive land uses to traffic noise. Implementation of the project would introduce a greater intensity of mixed-use and multi-family development that would generate traffic that would add to existing traffic noise levels. Because implementation of the project would result in a substantial increase in ambient noise due to traffic, increases in ambient noise levels due to project related traffic would be significant.</p>	
<p>Issue 2</p> <p>Would the project generate excessive groundborne vibration or groundborne noise levels?</p>	<p>Potential groundborne vibration impacts related to railroad and stationary sources would be less than significant; however, implementation of the Blueprint SD Initiative, Hillcrest FPA and University CPU would have the potential to result in groundborne vibration impacts related to construction if pile driving is proposed within close proximity of structures. As shown in Table 4.11-2, vibration generated by construction equipment has the potential to be substantial, since it has the potential to exceed the FTA criteria for architectural damage (e.g., 0.12 PPV for fragile or historical resources, 0.2 PPV for non-engineered timber and masonry buildings, and 0.3 PPV for engineered concrete and masonry). Although specific construction techniques are not known at this program level of review, there is a potential for pile driving to be proposed within the FTA screening distances, resulting in a significant impact.</p>	<p>Significant after Mitigation</p>
<p><b>4.12 Public Services</b></p>		
<p>Issue 1</p> <p>Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the</p>	<p><b>Blueprint SD Initiative</b></p> <p>Implementation of the Blueprint SD Initiative could result in the need for additional fire-rescue, police, school, and library facilities. As the location and need for potential future facilities cannot be determined at a program level of review, it is unknown what specific impacts, and the extent of these impacts may occur associated with the future construction and operation of such facilities. Future public services facilities projects would require a separate environmental review and compliance with regulations in</p>	<p><b>Blueprint SD Initiative</b></p> <p>Significant</p> <p><b>Hillcrest Focused Plan Amendment</b></p> <p>Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services, including fire protection, police protection, schools, and libraries?</p>	<p>existence at the time would reduce potential environmental impacts related to the construction and operation of these public services facilities. However, as it cannot be ensured that all impacts associated with the construction and operation of potential future public services facilities would be mitigated to less than significant, impacts would be significant.</p> <p><b>Hillcrest Focused Plan Amendment</b></p> <p>Implementation of the Hillcrest FPA could result in the need for additional fire-rescue, police, school, and library facilities. As the location and need for potential future facilities cannot be determined at the program level of review, it is unknown what specific impacts, and the extent of these impacts may occur associated with the future construction and operation of such facilities. Future public services facilities projects would require a separate environmental review and compliance with regulations in existence at the time would reduce potential environmental impacts related to the construction and operation of these public services facilities. However, as it cannot be ensured that all impacts associated with the construction and operation of potential future public services facilities would be mitigated to less than significant, impacts would be significant.</p> <p><b>University Community Plan Update</b></p> <p>Implementation of the University CPU could result in the need for additional fire-rescue, police, school, and library facilities. As the location and need for potential future facilities cannot be determined at this time, it is unknown what specific impacts, and the extent of these impacts may occur associated with the future construction and operation of such facilities. Future public services facilities projects would require a separate environmental review and compliance with regulations in existence at the time would reduce potential environmental impacts related to the construction and operation of these public services facilities. However, as it cannot be ensured that all impacts associated with the construction and operation of potential future public services facilities would be mitigated to a less than significant level, impacts would be significant.</p>	<p><b>University Community Plan Update</b></p> <p>Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<b>4.13 Recreation</b>		
<p>Issue 1</p> <p>Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?</p>	<p><b>Blueprint SD Initiative</b></p> <p>Implementation of the Blueprint SD Initiative could result in an increase in the use of existing neighborhood and regional parks and other recreational facilities, which could result in the deterioration of these facilities. The Blueprint SD Initiative includes a policy framework which supports the maintenance and provision of new recreational facilities. Additionally, future CPUs, Specific Plans, and FPAs that are implemented in accordance with the Blueprint SD Initiative could identify potential recreational opportunities and provide regulations and policies which support and facilitate the development of recreational facilities. While the development of future recreational amenities under the project could offset the potential increased use of existing recreational facilities, it is unknown where these future improvements would be located, the specific impacts and the extent of impacts that could result from providing these facilities, and to what extent these future facilities will be able to accommodate increases in demand for recreational facilities. Thus, as it cannot be ensured that all future impacts would be mitigated to a less than significant level, impacts would be significant.</p> <p><b>Hillcrest Focused Plan Amendment</b></p> <p>Implementation of the Hillcrest FPA could result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. While the development of the planned pocket park, as well as future recreational amenities supported by the project could offset the potential increased use of existing recreational facilities, it is unknown where these future improvements would be located, the specific impacts and the extent of impacts that could result from providing these facilities, and to what extent these future facilities will be able to accommodate increases in demand for recreational facilities. Thus, as it cannot be ensured that all impacts would be mitigated to a less than significant level, impacts would be significant.</p> <p><b>University Community Plan Update</b></p> <p>Implementation of the University CPU could result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. While the development of the recreational facilities identified by the University CPU could offset the potential</p>	<p><b>Blueprint SD Initiative</b></p> <p>Significant</p> <p><b>Hillcrest Focused Plan Amendment</b></p> <p>Significant</p> <p><b>University Community Plan Update</b></p> <p>Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
	<p>increased use of existing recreational facilities, it is unknown where these future improvements would be located, what specific impacts and the extent of impacts could result from providing these facilities, and to what extent these future facilities will be able to accommodate increases in demand for recreational facilities. Thus, as it cannot be ensured that all impacts would be mitigated to a less than significant level, impacts would be significant.</p>	
<p>Issue 2</p> <p>Would the project include recreational facilities or require the construction or expansion of recreational facilities which would have an adverse physical effect on the environment?</p>	<p><b>Blueprint SD Initiative</b></p> <p>Implementation of the Blueprint SD Initiative could require the construction and/or expansion of parks and recreational facilities. While compliance with the regulations in existence at that time would address potential environmental impacts related to the construction and operation of future recreational facilities, it is unknown where specific future developments would be located and what the specific environmental impacts and extent of impacts may be associated with providing these facilities. As it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to less than significant, impacts would be significant.</p> <p><b>Hillcrest Focused Plan Amendment</b></p> <p>Implementation of the Hillcrest FPA could require the construction and/or expansion of parks and recreational facilities in the Hillcrest FPA area. While compliance with the regulations in existence at that time projects are proposed would address potential environmental impacts related to the construction and operation of future recreational facilities, it is unknown where specific future developments would be located and what the specific environmental impacts and extent of impacts may be associated with providing these facilities. As it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to less than significant, impacts would be significant.</p> <p><b>University Community Plan Update</b></p> <p>Implementation of the University CPU could require the construction and/or expansion of parks and recreational facilities in the University CPU area. While compliance with the regulations in existence at that time would address potential environmental impacts</p>	<p><b>Blueprint SD Initiative</b></p> <p>Significant</p> <p><b>Hillcrest Focused Plan Amendment</b></p> <p>Significant</p> <p><b>University Community Plan Update</b></p> <p>Significant</p>



**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
	related to the construction and operation of future recreational facilities, it is unknown where specific future developments would be located and what the specific environmental impacts and extent of impacts may be associated with providing these facilities. As it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to less than significant, impacts would be significant.	
<b>4.14 Transportation</b>		
<p>Issue 1</p> <p>Would the project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?</p>	<p>Overall, the project would support improved pedestrian, bicycle and transit facilities and foster increased safety for all alternative modes by facilitating higher density development within areas closer to existing and planned transit. Additionally, the project provides policies that support improvements to pedestrian, bicycle, transit, and roadway facilities while reducing per capita VMT and increasing alternative mode share. Thus, the project would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities, and impacts would be less than significant.</p>	<p>Less than Significant</p>
<p>Issue 2</p> <p>Would the project result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?</p>	<p>The project would have a significant VMT impact at the program level due to residential, employment, and retail VMT exceeding 85 percent of the regional mean. -Although the model results show that VMT per capita (residents) for the Blueprint SD Initiative, University CPU, and Hillcrest FPA, and VMT per employee (employment) for the Blueprint SD Initiative and Hillcrest FPA would fall below the City's significance thresholds, these model results assume full implementation of the SANDAG Regional Plan transportation investments, <u>for which the timing of these investments cannot be ensured</u>. For the University CPU, even assuming <u>full</u> implementation of the SANDAG Regional Plan transportation investments, VMT per employee would be 85.3 percent of the regional mean, resulting in a significant VMT per employee impact under the University CPU. Overall, due to the fact that completion of all the SANDAG Regional Plan transportation investments cannot be ensured and future project-specific review is required for consistency with the City's TSM, at a program level of review, residential and employment VMT impacts would be significant; however, retail VMT impacts under the Hillcrest FPA would be less than significant.</p>	<p>Significant after Mitigation</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>Issue 3</p> <p>Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?</p>	<p>Any proposed improvements to roadways or amenities such as bicycle facilities would undergo review and approval by the City Engineer. Adherence to City standards, including the City's Street Design Manual, would ensure that a substantial increase in hazards or incompatible uses would not occur as a result of the proposed project. The proposed project does not include any requirements that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts would be less than significant.</p>	<p>Less than Significant</p>
<p>Issue 4</p> <p>Would the project result in inadequate emergency access?</p>	<p>The major interstate system, local highways, and prime arterials in the City serve as emergency evacuation routes throughout the City. The University CPU area has a number of transportation corridors that can serve as emergency evacuation routes including I-5, I-805, SR-52, which are accessible from Regents Road, Genessee Avenue, Governor Drive, Nobel Drive, Gillman Drive/La Jolla Colony Drive, and Sorrento Valley Road. Within the Hillcrest FPA area, access to I-5 via University Avenue and Washington Street, access to SR-163 from University Avenue, Washington Street and Robinson Avenue, and access to I-805 to the east via University Avenue or El Cajon Boulevard provide substantial evacuation routes in the event of an emergency. Future development in accordance with the project would be required to comply with all applicable City codes related to emergency access, including the City's Fire Code and the SDMC, would be reviewed for consistency with policies related to emergency access, and would be forwarded to the City Fire Marshall to ensure adequate emergency access. Through implementation of project specific requirements for roadway improvements consistent with the Fire Code, TSM, and the SDMC, and adherence to City policies and regulations, impacts associated with emergency access would be less than significant.</p>	<p>Less than Significant</p>
<p><b>4.15 Tribal Cultural Resources</b></p>		
<p>Issue 1</p> <p>Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is</p>	<p>While compliance with existing regulations including the City's Historical Resources Regulations, Historical Resources Guidelines, and tribal consultation requirements, and implementation of applicable General Plan and Community Plan policies would provide for the protection of tribal cultural resources and would minimize potential impacts, it is not possible to ensure the successful preservation of all tribal cultural resources at a program level of review. Pursuant to SDMC Section 143.0260, a deviation from the City's Historical Resources Regulations may be considered if a proposed development cannot to the</p>	<p>Significant after Mitigation</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:</p> <p>a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k), or</p> <p>b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe</p>	<p><u>maximum extent feasible comply with the regulations so long as the decision maker makes the applicable findings in SDMC Section 126.0504. Given the potential that future development could request deviations under the Historical Resources Regulations, it cannot be ensured that all impacts to Tribal Cultural Resources would be avoided or minimized.</u> Therefore, potential impacts to tribal cultural resources would be significant.</p>	
<b>4.16 Utilities and Service Systems</b>		
<p>Issue 1</p> <p>Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage,</p>	<p>Mandatory compliance with City standards for the design, construction, and operation of storm-water, water distribution, wastewater, electric power, natural gas, and communications systems infrastructure would likely minimize significant environmental impacts associated with the future construction of and/or improvements to utility infrastructure. At a project level of review, future development would consider the physical</p>	<p>Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
<p>electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?</p>	<p>impacts of utility improvements and physical impacts would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements. However, at this programmatic level of review and without the benefit of project-specific development plans, impacts associated with the construction of storm-water, water distribution, wastewater, electric power, natural gas, and communication systems would be significant.</p>	
<p>Issue 2 Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?</p>	<p>Impacts related to implementation of the Blueprint SD Initiative would be less than significant because this planning initiative plans for anticipated growth by focusing development within Climate Smart Village Area, prioritizing higher density multi-family and mixed-use development which is more water efficient than single family land uses. At the time specific land use changes are proposed, WSAs would be prepared to evaluate and document the availability of water supply over the planning horizon. Providing WSA projections based on build-out assumptions for the Blueprint SD Initiative would be speculative at this time as the land use changes have not occurred and water demand assumptions are based on more refined analysis of actual growth projections. As discussed under Issue 2, the water use assumptions for the Hillcrest FPA and University CPU are based on annual growth assumptions to provide a reasonable estimate of actual water demand. According to WSAs prepared for the University CPU and Hillcrest FPA, there would be adequate water supply in a normal, single-dry year, and multiple-dry year (20-year) period, to meet the estimated water demands within these communities through 2045, the water supply planning horizon. Therefore, water supply impacts related to the project would be less than significant.</p>	<p>Less than Significant</p>
<p>Issue 3 Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?</p>	<p>No new sewer collection or wastewater treatment facilities are proposed in conjunction with the proposed project. However, implementation of the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would allow for increased intensity of development that could increase demand on public sewer systems.</p> <p>As site-specific information regarding future demand and available wastewater capacity to serve development anticipated by the proposed project is not known at a program level of review, impacts would be significant.</p> <p>Mandatory compliance with the SDMC regulations, the City's Sewer Design Guidelines, and PUD's Capital Improvement Program Guidelines and Standards would ensure future</p>	<p>Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
	development is required to demonstrate adequate wastewater facilities and capacity is available to serve the project, or that appropriate infrastructure improvements are constructed concurrent with development to ensure adequate capacity. However, at this programmatic level of review and without project-specific development plans, potential impacts associated with increased demand on sewer infrastructure and wastewater capacity would be significant.	
<p>Issue 4</p> <p>Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?</p>	<p>Future development within the project areas would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region. However, future projects would be required to comply with City regulations regarding solid waste that are intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with existing regulations requiring waste diversion would help preserve solid waste capacity. Therefore, impacts associated with solid waste would be less than significant.</p>	<p>Less than Significant</p>
<b>4.17 Water Quality</b>		
<p>Issue 1</p> <p>Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?</p>	<p>Future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would have the potential to result in urban runoff and associated pollutant discharges. As future development occurs, applicable regulatory requirements would be triggered that would require the retention and/or treatment of stormwater through the implementation of BMPs. NPDES permit requirements would require future development to demonstrate how pollutants would be treated to prevent discharge into receiving waters. Additionally, the MS4 Permit requires development of WQIPs, administered through the Regional Water Quality Control Board and implemented by the City as a co-permittee, which would guide future development towards achieving improved water quality.</p> <p>New development occurring within the project areas would be required to implement LID BMPs into the design of future projects within the project areas to address the potential for transport of pollutants of concern through either retention or filtration, consistent with the requirements of the MS4 Permit for the San Diego region and the City's Stormwater Standards Manual. Implementation of LID BMP design and stormwater construction BMPs, as identified in the SWPP or WPCP, would reduce the amount of pollutants transported from the project areas to receiving waters. Future development projects implemented</p>	<p>Less than Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
	under the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would also be subject to existing stormwater regulations in place at the time projects are implemented. Thus, through compliance with the existing regulatory framework addressing protection of water quality, impacts would be less than significant.	
<p>Issue 2</p> <p>Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?</p>	<p>Future development that could result due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be required to comply with applicable WQIPs and the Water Quality Control Plan for the San Diego Basin which includes the groundwater management plan and BMPs to be implemented at the project level. Additionally, all development in the City is subject to the drainage regulations contained in the SDMC Chapter 14, Article 2, Division 2, Stormwater Runoff and Drainage Regulations, which require that all development be conducted to prevent erosion and stop sediment and pollutants from leaving the property to the maximum extent practicable. Thus, impacts would be less than significant.</p>	<p>Less than Significant</p>
<b>4.18 Wildfire</b>		
<p>Issue 1</p> <p>Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?</p>	<p>Implementation of Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are planning level actions that anticipate both future development and future planning level actions that may result in an increase in development intensities including the number of residents located within areas having wildfire risk. The increase in the number of residents located within areas at risk of wildland fires could increase the exposure of people and structures to wildfires and impacts would be significant.</p>	<p>Significant after Mitigation</p>
<p>Issue 2</p> <p>Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?</p>	<p>Build-out of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would result in higher intensity development within the City, primarily located within Climate Smart Village areas. As growth occurs, it would be focused within urban settings, in areas with an established transportation network. Throughout the City and beyond, there are generally adequate emergency evacuation routes through the major interstate system, local highways, and prime arterials within San Diego County. As growth occurs, the City's would continue to implement its Emergency Operations Plan, SDPD Policy and Procedures, Operational Area Emergency Plan, and the California Master Mutual Aid Agreement to address emergency evacuation. Further, as future development is implemented in accordance with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU, application of the City's existing fire code would prohibit any future development from</p>	<p>Less than Significant</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
	exacerbating any existing constraint related to development on a dead-end road as specified in SDMC Section 511.8201(f)(5)(2). Based on the foregoing information, impacts related to emergency evacuation would be less than significant.	
<p>Issue 3</p> <p>Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?</p>	<p>Future development that would occur under the project would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations to ensure that wildfire risks are not exacerbated. While it is not anticipated that future development would exacerbate wildfire risk, residents may be exposed to pollutant concentrations associated with wildfire and/or the uncontrolled spread of a wildfire. In the absence of project-specific information to evaluate site conditions such as slope and prevailing winds, it is not possible to conclude that the project along with all future development and actions anticipated under the project would not exacerbate wildfire risks. Therefore, at a program level of review, impacts related to exacerbation of wildfire risks resulting in exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire would be significant.</p>	<p>Significant after Mitigation</p>
<p>Issue 4</p> <p>Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or result in temporary or ongoing impacts on the environment?</p>	<p>There are some areas within the project areas that may have existing infrastructure deficiencies and may require capacity improvements to serve future projects implemented under the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU. Given that future specific development projects are unknown at this time, physical impacts associated with installation of and/or improvements to utilities infrastructure would be significant. Future utility and infrastructure improvements would be required to comply with all applicable City standards; thus, these improvements are not likely to exacerbate fire risk. However, at this programmatic level of review, potential temporary or ongoing impacts to the environment due to the installation or maintenance of infrastructure would be significant.</p>	<p>Significant after Mitigation</p>
<p>Issue 5</p> <p>Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of</p>	<p>While the project areas could be subject to risks associated with downstream flooding or landslides, the existing regulatory framework related to flooding and geologic hazards would minimize potential risks. Although individual developments would typically be able to avoid impacts associated with exposure of people or structures to risk resulting from runoff, post-fire slope instability or drainage changes through required compliance with City regulations, at a program level of review the significance of impacts cannot be determined. At the time of individual developments, evaluation of site-specific conditions</p>	<p>Significant after Mitigation</p>

**Table ES-1  
Summary of Environmental Impacts**

Issue Topic	Results of Impact Analysis	Impact Conclusion
runoff, post-fire slope instability, or drainage changes?	would be required. Therefore, in the absence of project-specific information to inform a detailed analysis, impacts related to exposure of people and/or structures to significant risks because of runoff, post-fire slope instability or drainage changes would be significant.	



# Chapter 1.0

## Introduction

This Program Environmental Impact Report (PEIR) has been prepared by the City of San Diego (City) in accordance with the California Environmental Quality Act (CEQA) Statute and Guidelines (Public Resources Code, Section 21000 et seq. and the California Code of Regulations, Title 14, Section 15000, et seq.), in accordance with the City's Environmental Impact Report Guidelines (City of San Diego 2005) and in accordance with the City's CEQA Significance Determination Thresholds (City of San Diego 2022). Collectively referred to as the "project," the following project components were analyzed in this PEIR:

- The "Blueprint SD Initiative," which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the "Hillcrest FPA"), which includes rezones, amendments to the City's Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (CPU) (hereinafter referred to as the "University CPU,"), which includes rezones, amendments to the LDC, and associated discretionary actions.

The Blueprint SD Initiative includes a comprehensive amendment to the General Plan (also referred to as the "General Plan Refresh") to better align the City of Villages strategy to reflect the City's latest goals, policies, and plans for housing, environmental protection and climate change adaptation, and sustainable growth. The Blueprint SD Initiative would amend the General Plan to reflect an updated citywide land use framework designed around the 2050 regional transportation network in the San Diego Association of Governments' (SANDAG) Regional Plan and is intended to promote reductions in per capita greenhouse gas emissions and vehicle miles traveled. The Blueprint SD Initiative identifies complementary land use, transportation, and related policies to further support opportunities for future development according to the revised land use framework and, ultimately, builds upon the City's climate goals as outlined in the Climate Action Plan and Climate Resilient SD Plan. The General Plan Refresh also replaces the 2008 General Plan Figure LU-1: Village Propensity Map with an updated Village Climate Goal Propensity Map that identifies areas for the prioritization of future homes and jobs. This map incorporates the 2050 regional transportation network from the ~~San Diego Association of Governments'~~ SANDAG Regional Plan and forms the basis for defining where future growth is anticipated throughout the City in addition to the anticipated intensity of development. Future CPUs, Specific Plans, and FPAs, as well as projects and future amendments to the LDC will be reviewed for consistency with the proposed General Plan policy framework and would be evaluated in the context of this PEIR.

The project also includes adoption of the Hillcrest FPA and the University CPU. The Hillcrest FPA proposes an amendment to the Uptown Community Plan to redesignate approximately 380 acres of the Hillcrest and Medical Complex Neighborhoods with land uses that follow a similar pattern to the

planned land uses from the 2016 Uptown Community Plan update with increases to the planned residential density and non-residential development capacity. The Hillcrest FPA will provide the opportunity for additional homes in the Hillcrest FPA area and is intended to encourage active transportation and provide more opportunities for quality public spaces.

The University CPU is a comprehensive update to the existing University Community Plan. The University CPU establishes an updated long-range, comprehensive policy framework and vision for growth and development in the University community that aligns with the General Plan. The University CPU updates the land use plan and mobility network for the University CPU area, which will guide future development in the community and provides policy guidance on vision and land use; urban design; mobility; parks and recreation; conservation and open space; historic preservation; public facilities, services, and safety; and implementation.

## 1.1 Purpose of the PEIR

In accordance with CEQA Guidelines Section 15121, the purpose of this PEIR is to provide public agency decision-makers and members of the public with general information about the potential significant environmental effects of the project, possible ways to minimize its significant effects, and reasonable alternatives that would reduce or avoid any identified significant effects. The PEIR includes recommended mitigation measures, which, when implemented, would lessen project impacts and provide the City, the lead agency as defined in Article 4 of the CEQA Guidelines (Sections 15050 through 15051), with ways to substantially lessen or avoid the significant effects of the project on the environment, whenever feasible. Alternatives to the project are presented to evaluate alternative land use scenarios, policies, and/or regulations that would further reduce or avoid significant impacts associated with the project.

## 1.2 Type of EIR

This document is a PEIR, as defined in Section 15168 of the CEQA Guidelines. A PEIR is prepared for a series of actions that are characterized as one large project through reasons of geography; as logical parts in the chain of contemplated actions; in connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program; or where individual activities will occur under the same regulatory process and having generally similar environmental impacts that can be mitigated in similar ways. Therefore, this PEIR is appropriate because the project would result in the adoption of future CPUs, Specific Plans, and/or FPAs that are consistent with the General Plan. The project would also result in the future development of land uses consistent with the General Plan's Village Climate Goal Propensity Map, the Hillcrest FPA, and the University CPU. These future actions would be considered in light of this PEIR and would be evaluated for consistency with the land use and policy framework evaluated throughout this document.

In accordance with CEQA Guidelines Section 15168, a PEIR may serve as the Environmental Impact Report (EIR) for subsequent activities or implementing actions, provided it contemplates and adequately analyzes the potential environmental impacts of those subsequent projects. If, in examining future actions for development within the project areas, the City finds no new effects could occur or no new mitigation measures would be required other than those analyzed and/or

required in this PEIR, the City can approve the activity as being within the scope covered by this PEIR and no new environmental documentation would be required.

The adoption of future CPUs, Specific Plans, and/or FPAs are anticipated future actions to be implemented consistent with the General Plan policy framework, including the proposed Village Climate Goal Propensity Map and City of Villages Strategy. These future CPUs, Specific Plans, and/or FPAs could be evaluated in a streamlined manner consistent with CEQA Guidelines Sections 15162, 15164, and/or 15183. CEQA Guidelines Section 15183 allows projects consistent with the development density established by existing zoning, community plan, or General Plan policies for which an EIR was certified to not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site.

After the adoption of plans and/or plan amendments, future project-specific development consistent with those plans and/or plan amendments may be proposed. These future site-specific development projects may also be evaluated in accordance with CEQA Guidelines Sections 15152, 15153, 15162, 15163, 15164, 15168, and 15183 provided they are consistent with the Blueprint SD Initiative, including the proposed Village Climate Goal Propensity Map. Where future development is proposed within an area subject to a land use plan that has been amended for consistency with the Blueprint SD Initiative and the Village Climate Goal Propensity Map, those specific development projects must demonstrate consistency with the applicable Community Plan, Specific Plan, and/or FPA and/or applicable zoning, but could be allowed to tier from this PEIR as it contemplates both future plan amendments, policy changes, and future development consistent with the General Plan.

## **1.3 Legal Authority**

### **1.3.1 Lead Agency**

The lead agency is “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment” (CEQA Guidelines Section 15367). The City, as the lead agency, has the principal responsibility for the approval of the project.

### **1.3.2 Responsible and Trustee Agencies**

State law requires that EIRs be reviewed by responsible and trustee agencies. Responsible agencies, as defined by CEQA Guidelines Section 15381, are all public agencies other than the Lead Agency that may have discretionary approval authority for a project. Trustee agencies are defined in CEQA Guidelines Section 15386 as state agencies that have jurisdiction by law over natural resources affected by a project that are held in trust for the people of the state of California. Implementation of the project may require subsequent actions and/or consultation from responsible or trustee agencies. A brief description of some of the primary responsible or trustee agencies that may have an interest in the project is provided below.

**California Department of Transportation (Caltrans).** Future projects resulting from the project may affect facilities within the jurisdiction of Caltrans. Although the project does not include construction permits, Caltrans approval would be required for any encroachments or future construction of facilities in a Caltrans right-of-way.

**San Diego Regional Water Quality Control Board (RWQCB).** The RWQCB regulates water quality through the federal Clean Water Act Section 401 certification process and oversees the National Pollutant Discharge Elimination System Permit No. CAS0109266, which consists of stormwater and non-stormwater discharge requirements into waters of the U.S within the San Diego Region. No permits from the RWQCB are required at this time; however, future individual development projects consistent with the project may require review and/or permits in the future.

**San Diego County Regional Airport Authority (Airport Authority).** The Airport Authority operates the airports and oversees implementation of adopted plans for regional air transportation needs. The Airport Authority also serves as the San Diego County Airport Land Use Commission and is responsible for land use planning relating to public safety surrounding airports. The project areas are located within the Airport Influence Areas of Brown Field Municipal Airport, Montgomery Field, Marine Corps Air Station Miramar, Naval Outlying Landing Field Imperial Beach, and San Diego International Airport.

**U.S. Army Corps of Engineers (USACE).** The USACE has jurisdiction over development in or affecting the navigable waters of the United States. All permits issued by the USACE are subject to consultation and/or review by the U.S. Fish and Wildlife Service (USFWS) and the U.S. Environmental Protection Agency. Drainages occurring within the project areas may contain streams and wetlands, which may be classified as jurisdictional waters of the United States. No permits from USACE are required at this time; however, future development projects, particularly improvements to infrastructure, such as water, sewer, and stormwater facilities that could occur with implementation of the project, may require review and/or USACE permits in the future.

**U.S. Fish and Wildlife Service (USFWS).** Acting under the federal Endangered Species Act, USFWS is responsible for ensuring that any action authorized, funded, or carried out by a federal agency (such as USACE) is not likely to jeopardize the continued existence of listed species or modify their critical habitat. Accordingly, USFWS will provide input to USACE as part of the federal Clean Water Act Section 404 process. The role of USFWS is limited within areas covered by the City's Multiple Species Conservation Program (MSCP) Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP). For listed species covered by the MSCP Subarea Plan and the VPHCP, USFWS has granted take authorization to the City in accordance with the requirements of the MSCP Implementing Agreement, executed between the City, USFWS, and the California Department of Fish and Wildlife (CDFW) in 1997.

**California Department of Fish and Wildlife (CDFW).** CDFW has the authority to reach an agreement with an agency or private party proposing to alter the bed, banks, or floor of any watercourse/stream, pursuant to Section 1600 et seq. of the California Fish and Game Code. CDFW generally evaluates information gathered during preparation of the environmental documentation and attempts to satisfy their permit concerns in these documents. Where state-listed threatened or endangered species not covered by the City's MSCP Subarea Plan or VPHCP occur on a project site, CDFW would be responsible for the issuance of a Memorandum of Understanding to ensure the

conservation, enhancement, protection, and restoration of state-listed threatened or endangered species and their habitats.

**California Coastal Commission.** In partnership with coastal cities and counties, the California Coastal Commission plans and regulates the use of land and water in the Coastal Zone. Development activities, which are broadly defined by the Coastal Act to include (among others) the construction of buildings, divisions of land, and activities that change the intensity of use of land or public access to coastal waters, generally require a coastal permit from either the California Coastal Commission or the local government. The Coastal Act includes specific policies (see Division 20 of the Public Resources Code) that address issues such as shoreline public access and recreation, lower cost visitor accommodations, terrestrial and marine habitat protection, visual resources, landform alteration, agricultural lands, commercial fisheries, industrial uses, water quality, offshore oil and gas development, transportation, development design, power plants, ports, and public works. The policies of the Coastal Act constitute the statutory standards applied to planning and regulatory decisions made by the California Coastal Commission and by local governments, pursuant to the Coastal Act. Project implementation would require discretionary actions from the California Coastal Commission where land use changes are proposed within the Coastal Zone. Future development projects within the University CPU and/or future CPUs, Specific Plans, FPAs, and/or development that is consistent with the Village Climate Goal Propensity map and located in the Coastal Zone may require California Coastal Commission review and/or Coastal Development Permits.

## 1.4 Notice of Preparation

The scope of analysis for this PEIR was determined by the City as a result of an initial project review and consideration of comments received in response to the Notice of Preparation (NOP) issued on July 19, 2021 (Appendix A). A public scoping meeting was held on August 5, 2021, from 12:00 p.m. to 2:00 p.m. via Zoom. Public outreach for the NOP included distribution using the following methods:

- The NOP was published on July 19, 2021, in the *San Diego Daily Transcript*;
- The NOP was posted at the office of the San Diego County Assessor-County Clerk-Recorder;
- The NOP was distributed to state agencies through the Governor’s Office of Planning and Research, State Clearinghouse; and
- The NOP was made available to the public for review at the following web locations:
  - <https://www.sandiego.gov/ceqa/meetings>
  - <https://www.sandiego.gov/planning/programs/ceqa>

Comments received during the NOP public review period from July 19, 2021, to August 18, 2021, are provided in Appendix A.

## 1.5 Scope of this PEIR

The scope of this PEIR was determined by the City's CEQA Significance Determination Thresholds (City of San Diego 2022), comments received in response to the NOP, and comments received at the public scoping meeting. Through these scoping activities, the project was determined to have the potential to result in significant environmental impacts to the following subject areas which are evaluated in further detail in this PEIR:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology
- Land Use and Planning
- Noise
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Water Quality
- Wildfire

A brief overview of the content of the various chapters of this PEIR is provided below.

**Executive Summary.** Provides a summary of this PEIR and a brief description of the project; identifies areas of controversy and issues to be resolved by the decision-makers; and includes a summary table of significant impacts, proposed mitigation measures, and significance of impact after mitigation. A summary of the project alternatives and a comparison of the potential impacts of the alternatives with those of the project is also provided.

**Chapter 1, Introduction.** Provides an overview of the legal authority, purpose, and intended uses of the PEIR, as well as its scope and content.

**Chapter 2, Environmental Setting.** Provides a description of the project's regional context, location, geography and topography, and existing land uses within the project areas.

**Chapter 3, Project Description.** Provides a detailed discussion of the project, including the location, background; objectives; technical, economic, and environmental characteristics; key features; and environmental design considerations; all agency decisions, and intended uses of this PEIR.

**Chapter 4, Environmental Analysis.** Provides a detailed evaluation of the potential environmental impacts associated with the project for several environmental and land use issues. The analysis of each issue begins with a discussion of the existing conditions and regulatory framework, followed by an evaluation of potential impacts, a summary of the impact conclusion, mitigation where applicable, and the significance of impacts after mitigation.

**Chapter 5, Effects Found Not to Be Significant.** Identifies all of the issues determined not to be significant for the project and briefly summarizes the basis for these determinations.

**Chapter 6, Growth Inducement.** Evaluates the potential influence the project may have on economic or population growth within the project areas as well as the region, either directly or indirectly.

**Chapter 7, Significant Unavoidable Impacts/Significant Irreversible Environmental Changes.** Provides a summary of any significant and unavoidable impacts associated with implementation of the project, describes the potentially significant irreversible changes that may be expected, and addresses the use of nonrenewable resources during implementation of the ~~proposed~~ project.

**Chapter 8, Alternatives.** Provides a description of alternatives to the project, including the No Project Alternative, ~~University Community Plan Update~~ High Density Alternative, Blueprint SD Initiative Distributed Growth Alternative, ~~the Hillcrest High Density Alternative~~, and the ~~Blueprint SD Initiative~~ Reduced Density Alternative.

**Chapter 9, Mitigation Monitoring and Reporting Program.** Documents all the mitigation measures identified in the PEIR.

**Chapter 10, Certification.** Documents individuals involved in preparation of the PEIR and certifies that the PEIR was prepared based on independent analysis and determinations made pursuant to San Diego Municipal Code Section 128.0103.

**Chapter 11, References.** Lists all of the reference materials cited in the PEIR.

## 1.6 Incorporation by Reference

As permitted by CEQA Guidelines Section 15150, this PEIR has referenced several technical studies and reports. Information from these documents has been briefly summarized in the analysis contained in this PEIR. These documents are included in Chapter ~~9~~11, References and are hereby incorporated by reference. They are available for review at the City's City Planning Department, located at 202 C Street, 5<sup>th</sup> Floor, San Diego, California 92101. Included within the list of materials incorporated by reference into this PEIR are the following:

- City of San Diego General Plan (2008)
- City of San Diego ~~Program Environmental Impact Report~~ Final PEIR for the General Plan (Final PEIR) (2008)
- City of San Diego Housing Element 2021-2029 (2020)
- City of San Diego Municipal Code
- City of San Diego Final PEIR for the Morena Corridor Specific Plan (2019)
- City of San Diego Final PEIR for the Balboa Avenue Station Area Specific Plan (2019)
- City of San Diego Final PEIR for the Golden Hill and North Park Community Plans Updates (2016)
- City of San Diego Final PEIR for the Midway-Pacific Highway Community Plan Update (2018)
- City of San Diego Final PEIR for the Mission Valley Community Plan Update (2019)
- City of San Diego Final PEIR for the Navajo Community Plan Update (2015)
- City of San Diego Final PEIR for the Ocean Beach Community Plan Update (2016)
- City of San Diego Final PEIR for the Otay Mesa Community Plan Update (2014)
- City of San Diego Final PEIR for the San Ysidro Community Plan Update (2016)

- City of San Diego Final PEIR for the Southeastern San Diego and Encanto Neighborhoods Community Plans Updates (2015)
- City of San Diego Final PEIR for the Uptown Community Plan Update (2016)
- City of San Diego Final PEIR for the Mira Mesa Community Plan Update (2022)
- City of San Diego Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (2020)
- City of San Diego Final PEIR for the Climate Action Plan (2015)
- City of San Diego Addendum to the Climate Action Plan Final PEIR for the 2022 Climate Action Plan (2022)
- City of San Diego Final Joint PEIR/Environmental Impact Statement for the Vernal Pool Habitat Conservation Plan (2017)
- California Department of Transportation, Los Angeles to San Diego (LOSSAN) Corridor Program Final Programmatic Environmental Impact Report/Environmental Impact Statement, State Clearinghouse Number 2002031067 (2007)

## 1.7 PEIR Process

This draft PEIR is being circulated for public review for 45 days in accordance with Public Resources Code Section 21091. Interested agencies and members of the public are invited to provide written comments on the PEIR to the City address shown on the title page of this document. Upon completion of the 45-day review period, the City will review all written comments received and prepare written responses for each. A final PEIR will incorporate the received comments, responses to the comments, and any changes to the PEIR that result from comments. The final PEIR will be presented for potential certification as the environmental document for the project. All persons who comment on the PEIR will be notified of the availability of the final PEIR and the date of the public hearing before the City.



## Chapter 2.0

# Environmental Setting

This chapter provides a “description of the physical environmental conditions in the vicinity of the project” (California Environmental Quality Act [CEQA] Guidelines Section 15125). The environmental setting provides the baseline physical conditions from which the lead agency “determines whether an impact is significant” (CEQA Guidelines Section 15125). Further details regarding the existing conditions within the project area as it relates to individual environmental topics can be found in the Environmental Settings of relevant sections of Chapter 4.0, Environmental Analysis.

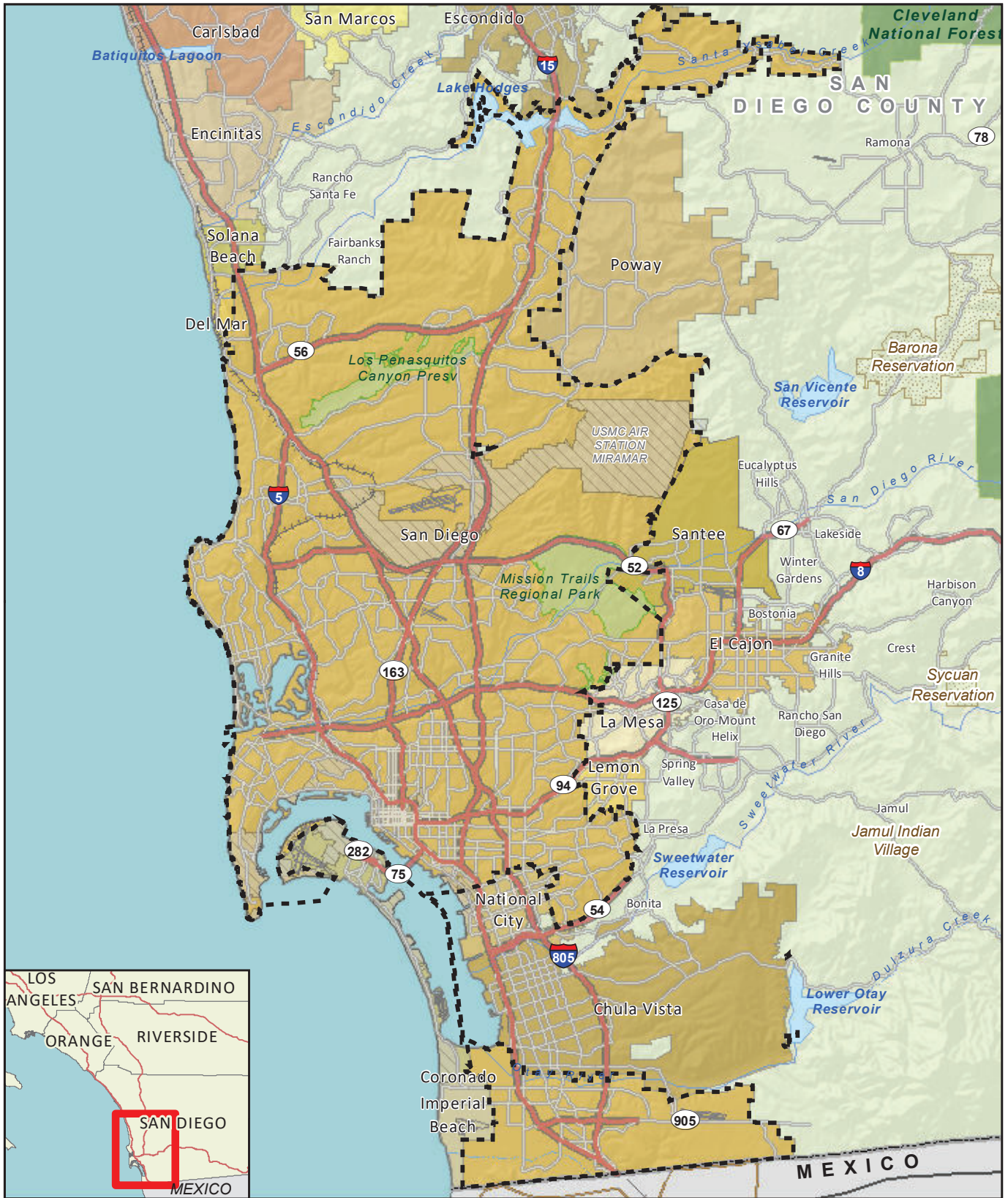
## 2.1 Project Location

### 2.1.1 Regional Location

The City of San Diego (City) is located within San Diego County in the southwestern corner of California. San Diego County is bordered by Riverside County to the north, Orange County at the northwest corner, Imperial County to the east, the Republic of Mexico to the south, and the Pacific Ocean on the west. As depicted in Figure 2-1, the City covers approximately 342.5 square miles and stretches nearly 40 miles from north to south. There are approximately 93 miles of shoreline including bays, lagoons, and the Pacific Ocean. Elevations mostly range from mean sea level to approximately 1,600 feet above mean sea level (AMSL). High points include Mount Soledad in La Jolla and Cowles Mountain in the eastern part of the City, which is nearly 1,600 feet high (City of San Diego 2008).

#### 2.1.1.1 Blueprint SD Initiative

The Blueprint SD Initiative proposes an updated policy and land use framework that would apply to all development citywide and is intended to guide future land use plan updates, such as Community Plan Updates (CPUs), Specific Plans, and Focused Plan Amendments (FPAs), and future Land Development Code (LDC) amendments which would help facilitate the implementation of the Blueprint SD Initiative. The Blueprint SD Initiative’s policy and land use framework is defined by the Village Climate Goal Propensity Map. The Village Climate Goal Propensity Map identifies village propensity values throughout the City and would replace the existing 2008 General Plan Figure LU-1: Village Propensity Map (Figure 2-2). This map would guide the development of future Community Plan Updates (CPUs), Specific Plans, and Focused Plan Amendments (FPAs), which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative’s Climate Smart Village Areas.



City of San Diego

FIGURE 2-1  
Regional Location



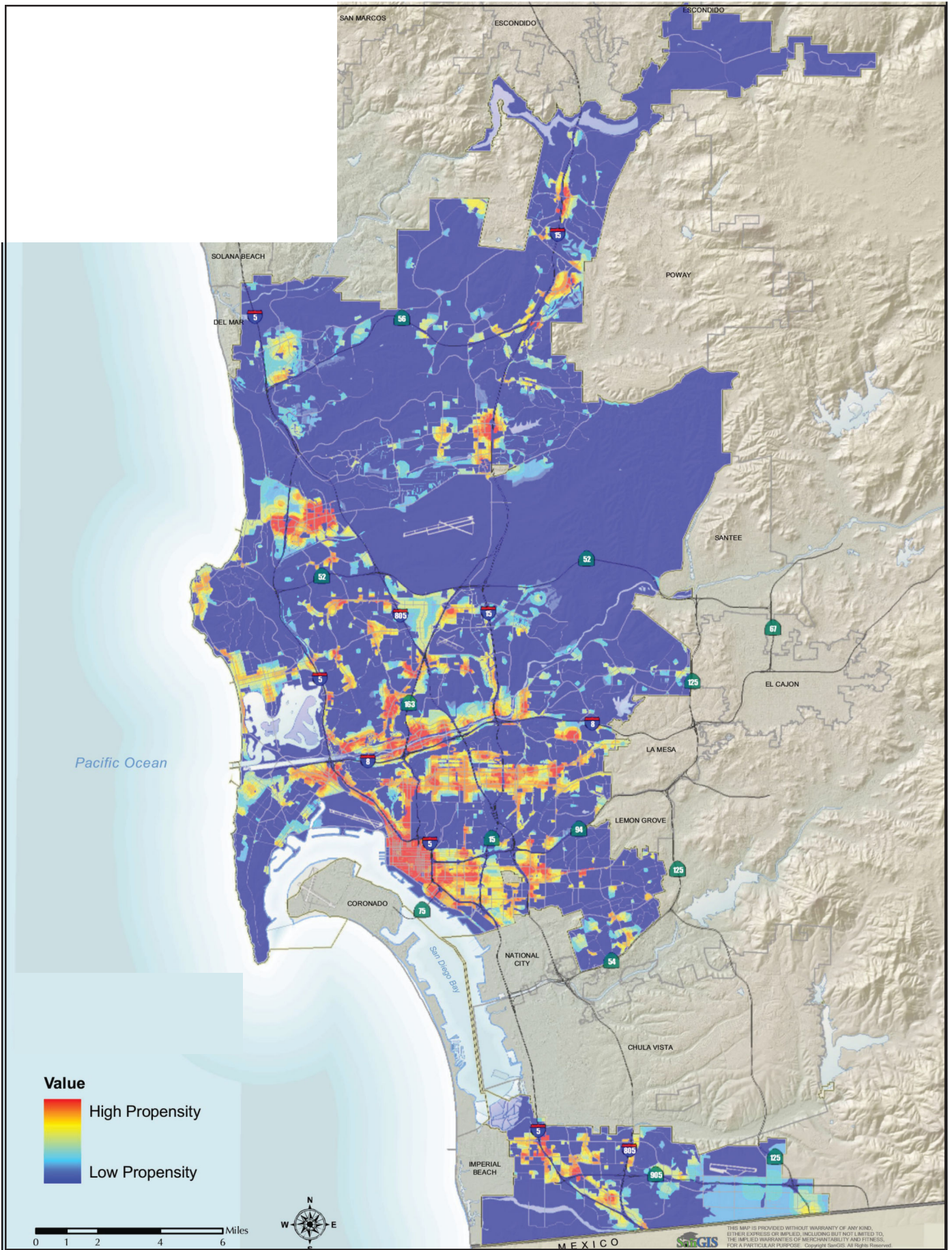


FIGURE 2-2  
Existing General Plan LU-1 Village Propensity

The Blueprint SD Initiative's Climate Smart Village Areas are areas throughout the City with a village propensity value of 7 through 14 (see Figures 3-1a through 3-1e). These are areas that have good access to homes, jobs, and mixed-use destinations and that are in proximity to high-frequency transit services, have transit access to job centers, and have good connections between transit and destinations. Certain areas within the City are excluded from consideration for future opportunities for homes and jobs and are identified as exclusion areas on the Village Climate Goal Propensity Map (see Figures 3-1a through 3-1e4.1-e). These general exclusion areas include the Port of San Diego, airports, Airport Land Use Compatibility Plan safety zone exclusions, cemeteries, military establishments, hiking trails, golf courses, conservation/ non-development land, schools and universities, large medical facilities, certain government/public land, federal land, certain parks, and industrial/research and development land uses.

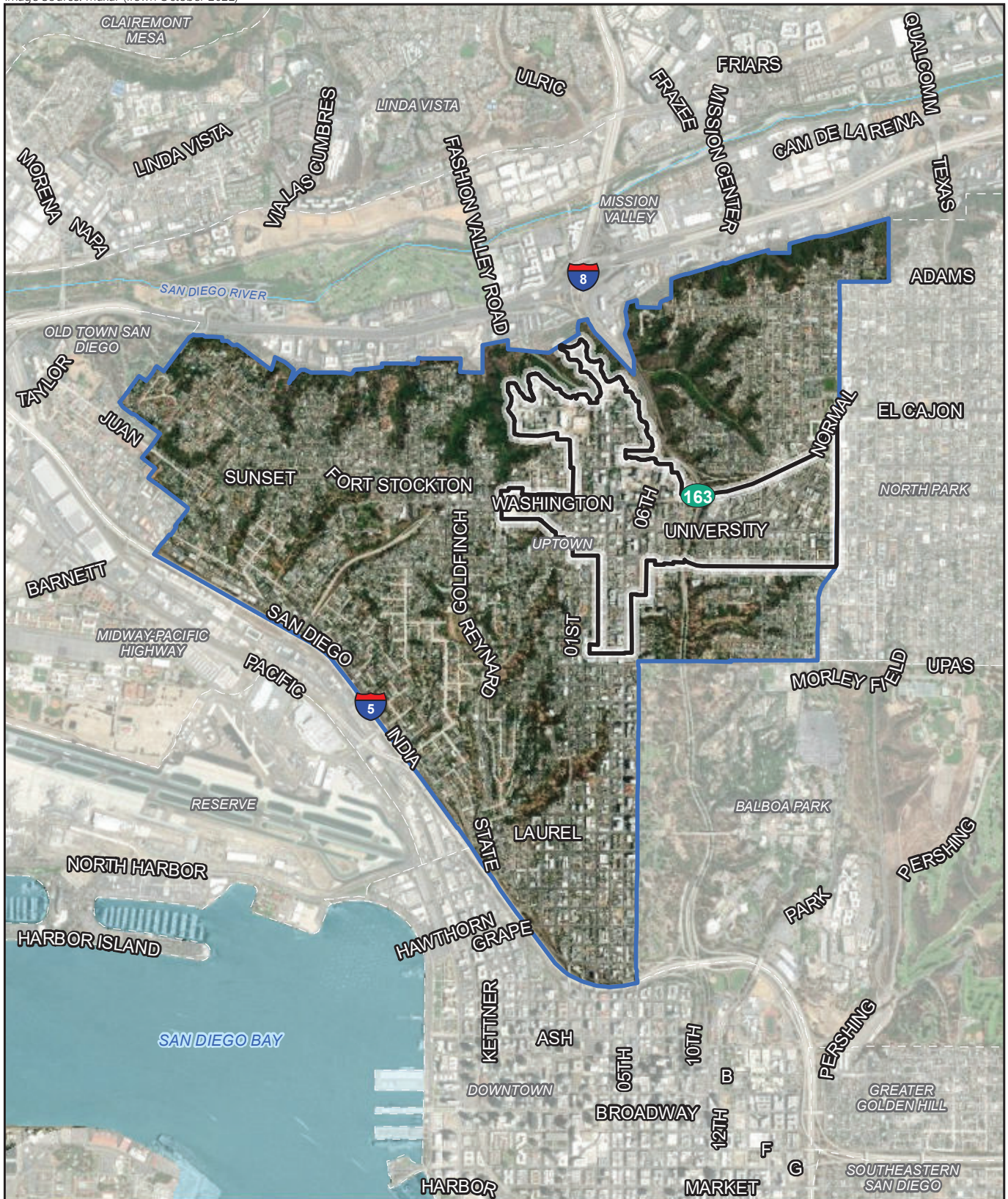
The Climate Smart Village Areas are areas that have the highest receptiveness for future development to maximize transit accessibility, walkability, alternative transportation modes, and residential and commercial mixed-use development. Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide, it is anticipated that potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas as these areas would be where future increases in development densities and intensities would most likely be focused. The Blueprint SD Initiative's Climate Smart Village Areas are located throughout the City.

### **2.1.1.2 Hillcrest Focused Plan Amendment Area**

The Uptown Community Plan area, where the Hillcrest FPA area is located, contains some of the oldest and most distinct neighborhoods in San Diego, consisting of Hillcrest, Mission Hills, Bankers Hill/Park West, University Heights, Middletown, and the Medical Complex. The Uptown Community Plan area is located just north of Downtown San Diego. It is bounded on the north by the steep hillsides of Mission Valley, on the east by Balboa Park and North Park, and on the west and south by Old Town San Diego, Midway-Pacific Highway, and Interstate (I-) 5. The Uptown Community Plan area is within two miles of the San Diego International Airport (SDIA). The Uptown Community Plan area comprises about 2,700 acres or approximately 4.2 square miles.

As shown in Figure 2-3, the Hillcrest FPA area is located in the center of the Uptown Community Plan area. The Hillcrest FPA area encompasses approximately 380 acres of the Hillcrest and Medical Complex neighborhoods. The Hillcrest FPA area is bound by a series of streets and canyons, including Park Boulevard to the ~~west~~east, Walnut Avenue to the south, Dove Street to the west, and the hilltop bluffs along the northern edge of the Medical Complex neighborhood. State Route (SR-) 163 splits the Uptown Community Plan area and the Hillcrest FPA area. The primary commercial core of Hillcrest is concentrated around the intersection of Fifth and University avenues and extends several blocks east, west, and south. Figure 2-4 identifies the Hillcrest FPA area's adopted land uses which include residential-medium high, residential-high, community commercial, office commercial, and institutional uses (City of San Diego 2020).







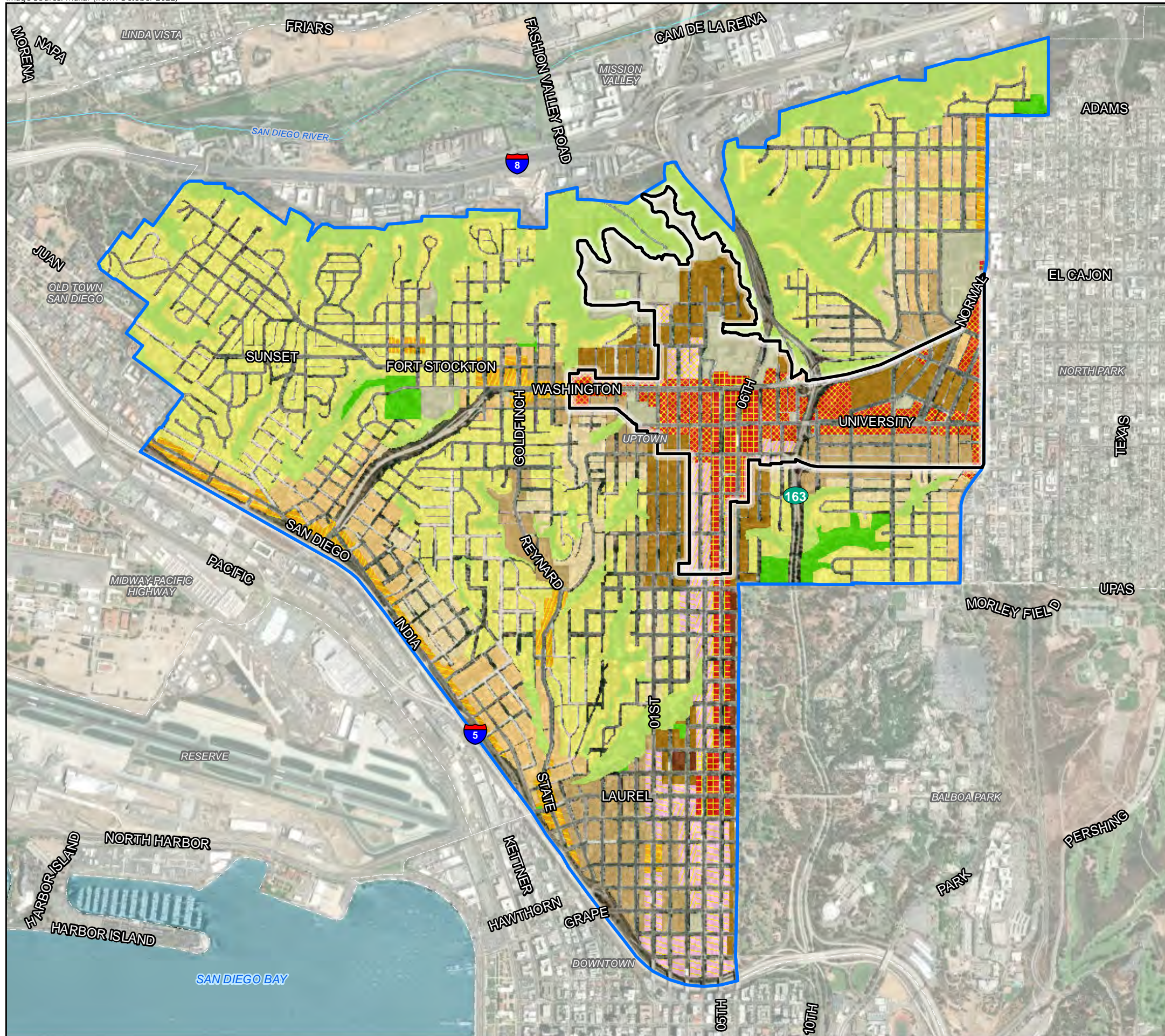
-  Hillcrest Focused Plan Amendment Area
-  Uptown Community Plan Area



FIGURE 2-3  
Uptown Community Plan with the  
Hillcrest Focused Plan Area on Aerial Photograph





- Hillcrest Focused Plan Amendment Area
- Uptown Community Plan Area
- Adopted Land Use**
- Residential**
- Residential - Low : 5-9 Du/Ac
- Residential - Low Medium : 10-15 Du/Ac
- Residential - Medium : 16-29 Du/Ac
- Residential - Medium High : 30-44 Du/Ac
- Residential - High : 45-73 Du/Ac
- Residential - Very High : 74-109 Du/Ac
- Commercial, Employment, Retail, and Services**
- Community Commercial : 0-29 Du/Ac
- Community Commercial : 0-73 Du/Ac
- Community Commercial : 0-109 Du/Ac
- Neighborhood Commercial : 0-15 Du/Ac
- Neighborhood Commercial : 0-29 Du/Ac
- Neighborhood Commercial : 0-44 Du/Ac
- Office Commercial : 0-29 Du/Ac
- Office Commercial : 0-44 Du/Ac
- Office Commercial : 0-73 Du/Ac
- Office Commercial : 0-109 Du/Ac
- Park, Open Space**
- Open Space
- Park
- Institutional**
- Institutional

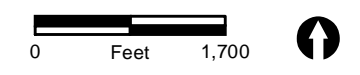


FIGURE 2-4  
Hillcrest Focused Plan Area Adopted Land Uses



### 2.1.1.3 University Community Plan Update Area

The University CPU area is located approximately 10 miles northwest of Downtown San Diego. The University CPU area is bound by Los Peñasquitos Lagoon and the edge of the east-facing slopes of Sorrento Valley to the north (Figure 2-5). The University CPU area comprises steep, undeveloped slopes in the northern, central, and southern areas, with the main topographic feature being a gently rolling mesa separated by canyons and hillsides. The neighboring communities include Torrey Pines, Mira Mesa, Clairmont Mesa, and La Jolla.

The total population within the University CPU area is approximately 69,400 residents. The University CPU area occupies only 4 percent of San Diego's land area, yet companies within the University CPU area provide about 12.3 percent of private jobs within the City. The 3,300 businesses in the University CPU area employ about 92,000 people. About 70 percent of jobs are within the educational services; professional, scientific, and tech services; healthcare and social assistance; finance and insurance; and accommodation and food service sectors. The University CPU area contains two state-controlled properties—University of California, San Diego (UCSD) and Torrey Pines State Natural Reserve—which lie outside the land use jurisdiction of the City (City of San Diego 2018).

The adopted land uses in the University CPU area are shown in Figure 2-6 and include a variety of land uses to encourage the economic development of the University CPU area into a robust, transit-oriented neighborhood. The University CPU identifies six Urban Design Districts within the CPU area with strategies to concentrate density near transit stops while supporting an active public realm. The six Urban Design Districts are depicted in Figure 2-7 and are detailed below (City of San Diego 2024).

#### North Torrey Pines

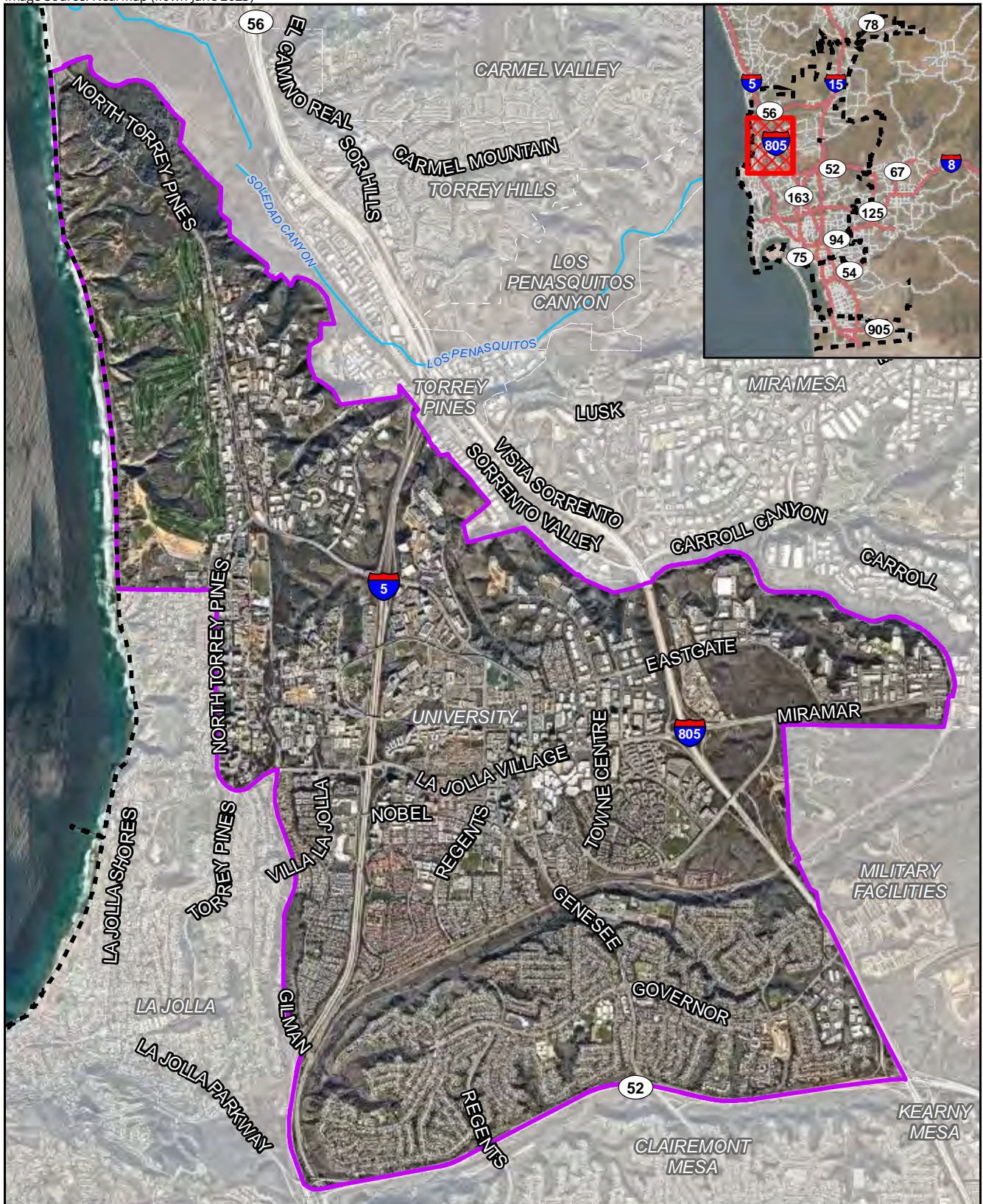
North Torrey Pines is located in the northern portion of the University CPU area. The area is a prime employment center with jobs primarily in the healthcare, life sciences, and biotechnology industries. The area is located just east of the Torrey Pines Golf Course and Scripps Institution of Oceanography, and just north of UCSD and the Salk Institute for Biological Studies.

#### Campus Point and Towne Centre

The Campus Point and Towne Centre Urban Employment Village is located just north of the core of the University CPU area, along Campus Point Drive and Towne Centre Drive, and is a prime employment center north of Genesee Avenue. The area also includes Eastgate Mini Park #1 and #2 and is located just north of the Mandell Weiss Eastgate City Park. The area is served by the Voigt Drive Trolley Station, UCSD Health La Jolla Station, and transit stops along Eastgate Mall.

#### University Towne Center

University Towne Center (UTC) is located in the core of the University CPU area. The area is accessible by transit including the Executive Drive Trolley Station and the UTC Trolley Station located at the UTC Transit Center. The area is home to large employers, visitor destinations, and regional destinations, including the UTC shopping center. The area also includes Mandell Weiss Eastgate City Park; is adjacent to Doyle Elementary School and Community Park; and is just north of University City High School and Nobel Athletic Area and Library.





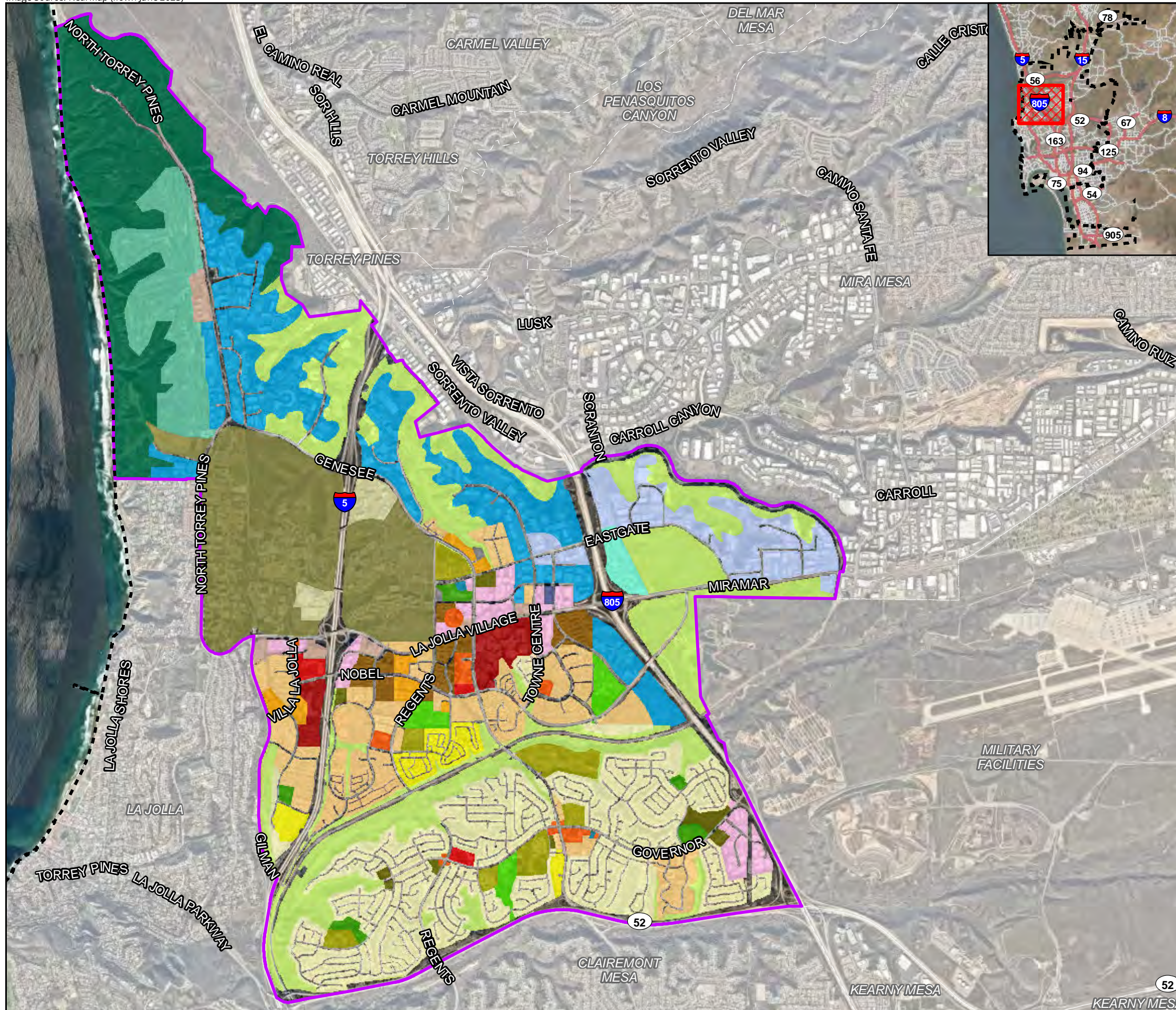
-  University Community Plan Update Area
-  San Diego City Limits

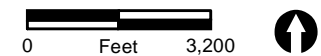


FIGURE 2-5  
University Community Plan Update Area  
on Aerial Photograph



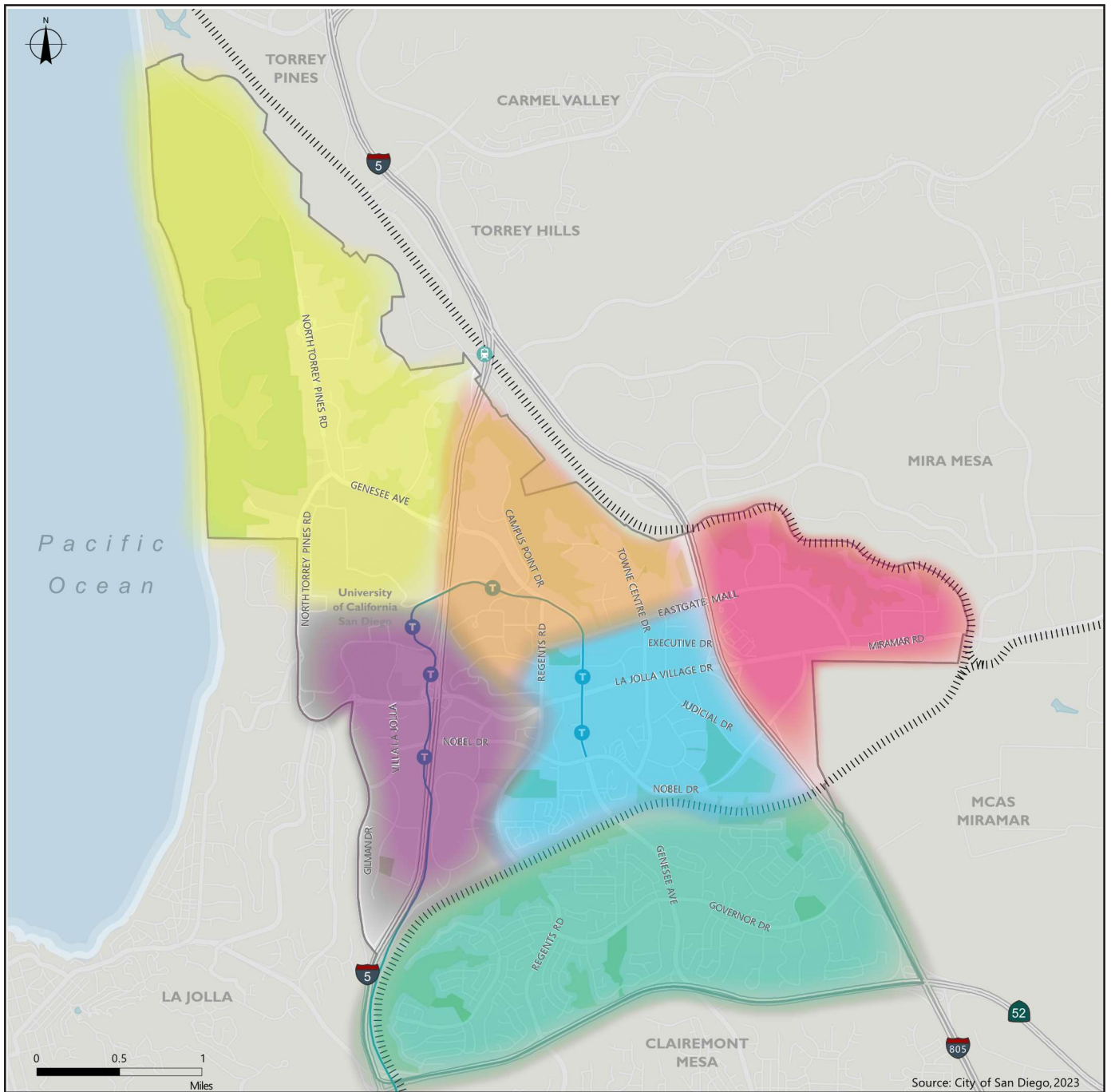


- University Community Plan Update Area
  - San Diego City Limits
- Adopted Land Use**
- Low Density Residential (5-10 du/ac)
  - Low-Med Density Residential (10-15 du/ac)
  - Medium Density Residential (15-30 du/ac)
  - Med-High Density Residential (30-45 du/ac)
  - High Density Residential (45-75 du/ac)
  - Neighborhood Commercial
  - Community Commercial
  - Visitor Commercial
  - Office Commercial
  - Regional Commercial
  - Business Park
  - Scientific Research
  - Restricted Industrial
  - Neighborhood Park
  - Community Park and Rec Center
  - Golf Course
  - Resource Based Park
  - Open Space
  - Hospital
  - School
  - UCSD
  - Institutional
  - Library
  - Police
  - Fire
  - Utility
  - Water Reclamation Plant



**FIGURE 2-6**  
University Community Plan Update Area  
Adopted Land Uses





Source: City of San Diego, 2023

- North Torrey Pines
- Nobel/Campus
- South University
- University Town Centre
- Miramar
- Campus Point & Towne Centre

**FIGURE 2-7**  
University Community Plan Update Area Neighborhoods

### **Nobel/Campus**

Nobel/Campus is located in the western portion of the University CPU area, just south of UCSD. The area is home to several shopping centers, visitor destinations, and the Nobel Drive Trolley Station. The western portion of the focus area is located a half-mile north of Villa La Jolla Park. The eastern portion of the focus area is adjacent to Doyle Community Park and Elementary School and the proposed Regents Road North linear park, with access to Rose Canyon to the south.

### **South University Neighborhood**

The South University Neighborhood is located in the southern portion of the University CPU area, south of Rose Canyon Open Space Park. The area includes two shopping centers: UC Marketplace to the west and University Square shopping center to the east. The neighborhood includes both single-family and multi-family housing; is located near Spreckels and Marie Curie Elementary Schools, Standley Middle School, Standley Park and Recreation Center, the University Community Branch Library; and is just south of University City High School.

### **Miramar**

Miramar is located in the eastern portion of the University CPU area, east of Interstate I-805. The area consists of industrial, public utility, and military uses.

## **2.2 Geography and Topography**

### **2.2.1 Blueprint SD Initiative**

The following is a regional description of citywide geology, geography, and topography, as the Climate Smart Village aAreas are located throughout various portions of the City.

The City is in a region with unique and varied landscapes—the Pacific Ocean, bays, beaches, estuaries and river valleys, canyons and mesas, hills and mountains, and desert. Much of the City is situated in the coastal plain portion of southwestern San Diego County. This coastal plain slopes gently upwards to the eastern foothills and has been eroded into separate mesas. Numerous side canyons have incised the coastal plain and created major drainages which generally flow westward towards the coast. These major drainages are the San Dieguito River, Los Peñasquitos Canyon, Carroll Canyon, Rose Canyon, San Diego River, Los Chollas Creek, Sweetwater River, Otay River, and the westernmost mouth of the Tijuana River.

The San Diego region is underlain by three principal geologic provinces. The majority of San Diego County is in the Peninsular Ranges province, bounded by the coastal province to the west and the Salton Trough province to the east. The western edge of the Peninsular Ranges province corresponds with the eastern hills and mountains along the edge of the cities of Poway and El Cajon, and the unincorporated community of Lakeside. Extending east of the unincorporated communities of Julian and Jacumba, the province abruptly ends along a series of faults. To the north, the Peninsular Ranges province continues into the Los Angeles basin area; to the south it makes up the peninsula of Baja California, Mexico.

As the Peninsular Ranges province experienced uplifting and tilting, a series of large faults, such as the Elsinore and San Jacinto, developed along the edge of the province. The eastern area “dropped” down, creating what is now known as the Salton Trough-Gulf of California depression. The Salton Trough province, being lower than the surrounding landscape, became an area of deposition, with sediments being carried to the depressed area by drainages of the Peninsular Ranges. Occasionally, the Salton Trough was inundated with marine waters from the Gulf of California, adding marine deposits to the sediment.

The City lies in the coastal plain province which extends from the western edge of the Peninsular Ranges and runs roughly parallel to the coastline. The province is composed of dissected, mesa-like terraces that graduate inland into rolling hills. The terrain is underlain by sedimentary rocks composed mainly of sandstone, shale, and conglomerate beds, reflecting the erosion of the Peninsular Ranges to the east (City of San Diego 2008).

## 2.2.2 Hillcrest Focused Plan Amendment Area

The Uptown Community Plan area’s topography generally consists of a level mesa that is segmented by canyons and borders two major parks, Presidio and Balboa. It also affords scenic views of Downtown San Diego, the Pacific Ocean, canyons, the San Diego Bay, City of Coronado, and Point Loma. As shown in Figure 2-4, the Hillcrest FPA area is one of the more intensely developed neighborhoods in Uptown.

## 2.2.3 University Community Plan Update Area

The University CPU area contains steep undeveloped slopes in the northern, central, and southern areas. The predominant topographic features are the gently rolling mesas separated by canyons and hillsides. Elevations within the University CPU area range from approximately 5 feet AMSL along the coast to approximately 440 feet AMSL along the mesa tops.

Grading associated with the construction of various residential, commercial, and transportation development projects through the years has altered much of the original topography within the University CPU area. This has resulted in the placement of fill soils that range from areas with less than two feet (placed for construction of the existing Atchison Topeka and Santa Fe Railroad railway) to thicker fill zones that are several tens of feet thick (placed during mass grading of several subdivisions and Interstate 15).

Approximately half of the University CPU area contains urban development with the other half being undeveloped as a natural preserve, open spaces, and canyons. Within developed areas, isolated areas contain native vegetation, mostly within the canyons and associated riparian drainages. The majority of the undeveloped area within the University CPU area lies within the limits of the Torrey Pines State Natural Reserve, which contains a mix of wetland communities, riparian drainages, canyon slopes, and bluffs or cliffs. Vegetation communities within the preserve include Torrey pine woodland, chaparral, grasslands, riparian forest and scrub, and wetlands. Additional native vegetation communities are present within Rose Canyon and along the eastern boundary of the University CPU area, and consist of grasslands, chaparral, forest/woodland, and scrub vegetation communities.

Geologically, the University CPU area is in the Coastal Plain region of San Diego County, which is characterized by a layered sequence of now-elevated marine terraces and their associated marine and nonmarine sediments.

## 2.3 Climate

The San Diego region, including the project areas, are influenced by proximity to the Pacific Ocean and semi-permanent, high-pressure systems that result in warm, dry summers and mild, occasionally wet winters. The project areas are subject to frequent offshore breezes. The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds blowing pollutants away from the coast toward inland areas. Consequently, air quality near the coast is generally better than what occurs at the base of the coastal mountain range. Portions of the project areas including the Climate Smart Village Areas and the University CPU area are within the Coastal Zone and are subject to the California Coastal Act.

The project areas, like the rest of San Diego County's coastal areas, have a Mediterranean climate characterized by warm, dry summers and mild, wet winters. The mean annual temperature at the SDIA is 63 degrees Fahrenheit (°F). The average annual precipitation for San Diego County is approximately 10 inches, falling primarily from November to April. Winter mean low temperatures average 49°F, and summer mean high temperatures average 74°F based on the measurements taken at SDIA.

Fluctuations in the strength and pattern of winds from the Pacific High Pressure Zone interacting with the daily local cycle produce periodic temperature inversions that influence the dispersal or containment of air pollutants in the San Diego Air Basin. Beneath the inversion layer pollutants become "trapped" as their ability to disperse diminishes. The mixing depth is the area under the inversion layer. Generally, the morning inversion layer is lower than the afternoon inversion layer. The greater the change between the morning and afternoon mixing depths, the greater the ability of the atmosphere to disperse pollutants.

Throughout the year, the height of the temperature inversion in the afternoon varies between approximately 1,500 and 2,500 feet AMSL. In winter, the morning inversion layer is about 800 feet AMSL. In summer, the morning inversion layer is about 1,100 feet AMSL. Therefore, air quality generally tends to be better in the winter than in the summer.

The prevailing westerly wind pattern is sometimes interrupted by regional "Santa Ana" conditions. A Santa Ana occurs when a strong high pressure system develops over the Nevada to Utah area and overcomes the prevailing westerly coastal winds, sending strong, steady, hot, dry northeasterly winds over the mountains and out to sea.

Strong Santa Ana winds tend to blow pollutants out over the ocean, producing clear days. However, at the onset or during breakdown of these conditions or if the Santa Ana is weak, local air quality may be adversely affected. In these cases, emissions from the South Coast Air Basin to the north are blown out over the ocean, and the low pressure over Baja California draws this pollutant-laden air mass southward. As the high pressure weakens, prevailing northwesterly winds reassert themselves

and send this cloud of contamination ashore in the San Diego Air Basin. When this event does occur, the combination of transported and locally produced contaminants produces the worst air quality measurements recorded in the basin.

## 2.4 Existing Land Use

### 2.4.1 Blueprint SD Initiative

The existing land uses within the City as reported by the San Diego Association of Governments (SANDAG) as of 2023 are shown in Table 2-1. As shown, the majority of the land use in the City is parks, open space, and recreation at 28 percent of the City's land area, with residential land uses following close behind occupying 25 percent of the City's land area. City ~~designated~~<sup>adopted</sup> land uses as of 2023 are reported in Table 2-2.

Table 2-1 Existing Land Uses (as of 2023)		
General Plan Land Use Category	Existing Uses	
	Acres	% of Total
Agriculture	4,458	2
Commercial Employment, Retail, and Services <sup>1</sup>	8,485	4
Industrial Employment	8,547	4
Institutional, Public and Semi-Public Facilities <sup>2</sup>	37,704	17
Multiple Use <sup>1</sup>	--	--
Park, Open Space and Recreation <sup>3</sup>	62,075	28
Residential	54,028	25
Roads/Freeways/Transportation Facilities <sup>4</sup>	33,045	15
Water Bodies (non-recreational) <sup>4</sup>	6,932	3
Vacant <sup>4,5</sup>	3,966	2
<b>Total</b>	<b>219,241<sup>6</sup></b>	<b>100</b>
<sup>1</sup> Multiple Use is a General Plan land use category; however, SANDAG existing land use data identifies most mixed-use areas based on their prominent non-residential use such as office or commercial, even when residential exists on-site. Therefore, Multiple Use information is not complete for existing land uses. <sup>2</sup> The Institutional, Public, and Semi-Public Facilities category includes approximately 26,547 of existing acres of military use. <sup>3</sup> The Park, Open Space and Recreation category includes approximately 2,578 acres of recreational water bodies. <sup>4</sup> Not a General Plan land use category; however, it is included to provide an accurate account for total acreage in the City. <sup>5</sup> Includes vacant undevelopable and potentially developable land. <sup>6</sup> Totals may vary due to independent rounding. SOURCE: SANDAG 2023		

<b>Table 2-2 Adopted Community General Plan Land Uses (as of 2023)</b>		
General Plan Land Use Category	Adopted Uses	
	Acres	% of Total
Agriculture	3,775	2
Commercial Employment, Retail, and Services	4,933	2
Industrial Employment	10,818	5
Institutional, Public and Semi-Public Facilities <sup>1</sup>	37,116	17
Multiple Use	5,520	3
Park, Open Space and Recreation <sup>2</sup>	64,298	29
Residential	56,457	26
Roads/Freeways/Transportation Facilities <sup>3</sup>	29,392	13
Water Bodies (non-recreational) <sup>3</sup>	6,932	3
<b>Total</b>	<b>219,241</b>	<b>100</b>
<sup>1</sup> The Institutional, Public and Semi-Public Facilities category includes approximately 26,547 of existing acres of military use. <sup>2</sup> The Park, Open Space and Recreation category includes approximately 2,578 acres of recreational water bodies located within park and open space areas. <sup>3</sup> Not a General Plan land use category; however, it is included to provide an accurate account for total acreage in the City. SOURCE: SANDAG 2023		

The existing land uses within Blueprint SD Initiative Climate Smart Village Areas are reflected in Table 2-3. These are the existing land uses based on SANDAG's Regional Land Use Database as of April 2023.

<b>Table 2-3 Blueprint SD Initiative Climate Smart Village Areas Generalized Land Use</b>	
Land Use	Acreage
Commercial Employment, Retail, and Services	1,827
Industrial Employment	871
Institutional, Public and Semi-Public Facilities	862
Multiple Use	2,685
Military Use	70
Park, Open Space and Recreation	1,487
Residential	9,594
Roads/Freeways/Transportation	6,875
Other/Unknown	133
Vacant (blank)	530
<b>TOTAL</b>	<b>24,936</b>
SOURCE: SANDAG 2023 NOTE: Numbers in the table are approximate.	

### ***Commercial Employment, Retail, and Services***

The Commercial Employment, Retail, and Services land use designation includes areas identified as Neighborhood Commercial, Community Commercial, Regional Commercial, Office Commercial, Visitor Commercial, and Heavy Commercial. Generally, these areas provide a range of retail, service, civic, hotel, office, and occasionally residential uses.

### ***Industrial Employment***

The Industrial Employment land use designation includes areas identified as Business Park, Business Park-Residential, Scientific Research, Technology Park, Light Industrial, and Heavy Industrial. Generally, these areas provide a variety of industrial uses which include office, research and development, corporate headquarters, and a range of manufacturing, warehousing, storage, wholesale distribution and transportation terminals.

### ***Institutional, Public and Semi-Public Facilities***

The Institutional, Public and Semi-Public Facilities land use designation defines areas that are identified as public or semi-public facilities and which offer public and semi-public services to the community. Uses may include but are not limited to airports, military facilities, community colleges, university campuses, landfills, communication and utilities, transit centers, water sanitation plants, schools, libraries, police and fire-rescue facilities, cemeteries, post offices, hospitals, park-and-ride lots, government offices, and civic centers.

### ***Multiple Use***

The Multiple Use land use designation includes areas identified as Neighborhood Village, Community Village, and Urban Village which are characterized by mixed-use land uses. The Village designations apply to areas that provide varying degrees of housing in a mixed-use setting that is integrated with shopping, civic uses, and services.

### ***Park, Open Space and Recreation***

The Park, Open Space and Recreation land use designation includes areas identified as Open Space, Population-based Parks, Resource-based Parks, and Private/Commercial Recreation. These areas are generally non-urban in character and may have utility for the following: park and recreation purposes, passive or active recreation; conservation of land, water, or other natural resources; or historic or scenic purposes.

### ***Residential***

The Residential land use designation includes all single-family and multi-family housing with varying density ranges.



## 2.4.2 Hillcrest Focused Plan Amendment Area

The existing land uses based on SANDAG's Regional Land Use Database within the overall Uptown Community Plan area in addition to the Hillcrest FPA areas are reflected in Table 2-4.

Land Use	Uptown CPU Area (acres)	Hillcrest FPA Area (acres)
Commercial Employment, Retail, and Services	235	112
Institutional, Public and Semi-Public Facilities	84	52
Park, Open Space and Recreation	469	0
Residential	1,113	79
Roads/Freeways/Transportation	741	123
Vacant	1	1
<b>TOTAL</b>	<b>2,644</b>	<b>380</b>
SOURCE: SANDAG 2023		
NOTE: Numbers in the table are approximate.		

## 2.4.3 University Community Plan Update Area Existing Land Uses

The existing land uses based on SANDAG's Regional Land Use Database within the University CPU area are reflected in Table 2-5.

Land Use	Acreage
Commercial Employment, Retail and Services	392
Industrial Employment	1,111
Institutional, Public and Semi-Public Facilities	1,256
Park, Open Space and Recreation	2,670
Residential	1,821
Roads/Freeways/Transportation	1,422
Other/Unknown	5
<b>TOTAL</b>	<b>8,676</b>
SOURCE: SANDAG 2023	
NOTE: Numbers in the table are approximate.	

# Chapter 3.0

## Project Description

### 3.1 Introduction

The project analyzed in this Program Environmental Impact Report (PEIR) includes the following:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

### 3.2 Project Background

#### 3.2.1 General Plan

The General Plan provides a policy framework for land use decisions that balances the needs of a city as required by state law (Government Code Section 65300). It expresses a citywide vision and provides a comprehensive approach for how the City should develop, provide public services, and maintain and enhance the qualities that define the City of San Diego. The overarching strategy of the General Plan is based on the City of Villages, which focuses growth into mixed-use activity centers that are pedestrian-friendly districts linked to the planned regional transit system.

The General Plan provides a vision and policy framework to guide the development of each of the City’s 52 community planning areas. Community plans are written to refine the General Plan’s citywide policies and provide location-based policies and recommendations to guide development over a 20-to-30-year timeframe. Community plans provide more detailed land use designations and community-specific policies on a wide array of topics including housing, mobility, open space and parks, public facilities, safety, noise, sustainability, environmental justice, urban design, and historic preservation.

The General Plan and community plans play a critical role in meeting the City’s Climate Action Plan (CAP) goals and contributing to the region’s mobility vision and needs and other citywide policy documents such as the City’s Climate Resilient SD Plan. The General Plan and community plans identify land uses and public improvements that work toward achieving the citywide mobility mode share goals. As such, the City has shifted away from accommodating additional vehicular travel, to

instead focus on reducing vehicular travel through strategic land use planning primarily by locating new development within walking distance to transit stops and stations and through investments in walking/rolling, bicycling, and transit improvements.

### **3.2.1.1 Amendments to the General Plan since 2008**

The General Plan was comprehensively updated in 2008. Since then, the City has grown and changed significantly as reflected in many of the City's recent planning efforts including the adoption of the City's CAP and the adoption of 14 CPUs, one FPA, and six specific plans as detailed in Section 3.2.1.2, below. In 2021, the San Diego Association of Governments (SANDAG) adopted a Regional Transportation Plan, referred to as the Regional Plan, which includes an updated regional transportation network. The City uses the regional transportation network identified by SANDAG for planning purposes and to encourage the development of homes near transit and provide more mobility options and investment in active transportation infrastructure. This approach enables the City to better coordinate future growth with planned infrastructure investments.

In addition to project-specific General Plan amendments, the following is a list of amendments to General Plan elements that have been adopted since the last comprehensive update in 2008:

- Conservation Element (2012)
- Land Use and Community Planning Element (2010 and 2015). Note: Community plans are incorporated by reference into the Land Use and Community Planning Element. Comprehensive updates and project-specific amendments to the City's community plans constitute amendments to Land Use and Community Planning Element. Community plans that have been comprehensively updated and adopted since 2008 are listed further below.
- Mobility Element (2015)
- Economic Prosperity Element (2015 and 2022)
- Noise Element (2015)
- Housing Element (2020)
- Recreation Element (2010, 2015, and 2021)
- Public Facilities, Services, and Safety Element (2010, 2015, 2018, 2021, and 2022)

Several plans, planning studies, programs, and ordinances have been adopted or approved since the General Plan update in 2008, including but not limited to the following:

- Bicycle Master Plan (2013)
- Vernal Pool Habitat Conservation Plan (2017)
- Complete Communities: Housing Solutions and Mobility Choices (2020)
- Parks Master Plan (2021)
- Climate Resilient SD (2021)
- Climate Action Plan (2015, 2022)

### **3.2.1.2 Environmental Justice Element**

The City is also in the process of preparing an Environmental Justice Element as required by Government Code Section 65302. The Environmental Justice Element would be incorporated as an

amendment to the General Plan and is a separate action from the project. To comply with Senate Bill (SB) 1000, the City Council would adopt or review the addition of the Environmental Justice Element into the General Plan prior to acting on the project. The Environmental Justice Element would address goals and policies for ensuring the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies.

### **3.2.1.3 Community Plan Updates**

The City maintains 40 community plans, three subarea plans, three specific plans, and two precise plans that provide land use guidance for the long-term development of a particular community planning area. Community plans, including the other community-wide land use plans, are incorporated by reference into the Land Use and Community Planning Element of the General Plan. Since the General Plan update in 2008, the City has adopted 14 CPUs and one FPA. The City has also adopted six specific plans to provide greater policy guidance and site-specific development regulations for areas within a community plan. These updates have also resulted in various amendments to the LDC (Chapters 11–15 of the San Diego Municipal Code [SDMC]). The City is in the process of updating four community plans and preparing an FPA.

#### ***Community Plan Updates and Focused Plan Amendments (Completed)***

- Otay Mesa (2014)
- Ocean Beach (2015)
- Navajo (Grantville FPA) (2015)
- Encanto Neighborhoods (2015)
- Southeastern San Diego (2015)
- San Ysidro (2016)
- Greater Golden Hill (2016)
- North Park (2016)
- Uptown (2016)
- Old Town San Diego (2018)
- Midway-Pacific Highway (2018)
- Mission Valley (2019)
- Kearny Mesa (2020)
- Barrio Logan (2021)
- Mira Mesa (2022) (Pending California Coastal Commission Certification)

#### ***Specific Plans (Completed)***

- Quarry Falls (Mission Valley) (2008)
- San Ysidro Historic Village (San Ysidro) (2016)
- Otay Mesa Central Village (Otay Mesa) (2017)
- Morena Corridor (Linda Vista and Clairemont Mesa) (2019)
- Balboa Avenue Station Area (Pacific Beach and Clairemont Mesa) (2019)
- Riverwalk (Mission Valley) (2020)

### ***Community Plan Updates and Focused Plan Amendments (In Process)***

- Clairemont Mesa
- College Area
- University (proposed as part of this project)
- Uptown–Hillcrest FPA (proposed as part of this project)
- Mid-City: City Heights, Eastern Area, Kensington-Talmadge, and Normal Heights

### **3.2.1.4 Housing Element and Regional Housing Needs Allocation**

The City is required by state law to adequately plan to meet the housing needs of everyone in the City, and to update its Housing Element every eight years. On June 16, 2020, the San Diego City Council adopted the 2021-2029 Housing Element. The City subsequently adopted revisions to the Housing Element in June 2021 to meet the certification conditions identified by the State of California Department of Housing and Community Development (HCD) in their October 2020 compliance letter. The Housing Element received full certification from HCD on September 10, 2021.

To ensure that a range of housing opportunities is provided for a broad spectrum of persons, the General Plan Housing Element is required by state law to address the City's regional share of housing needs which is referred to as the Regional Housing Needs Assessment (RHNA). The Housing Element is also required to include an inventory of sites (parcels) within the City that are suitable for development, and to demonstrate that the City's inventory of sites, and the sites' current residential capacity under existing land use plans and zoning, are adequate to meet the City's total RHNA target and its lower (low and very low) income affordable housing RHNA target.

The City's target for the 2021-2029 Housing Element cycle is 108,036 housing units. These units must be produced in a number of income categories defined by the percentage of the area median income (AMI). The City is tasked with achieving housing production by income group as follows:

- 12,380 housing units in the Extremely Low-Income category (0-30 percent of AMI)
- 15,169 housing units in the Very Low-Income category (31-50 percent of AMI)
- 17,331 housing units in the Low-Income category (51-80 percent of AMI)
- 19,319 housing units in the Moderate-Income category (81-120 percent of AMI)
- 43,837 housing units in the Above Moderate-Income category (>121 percent of AMI)

Although progress has been made in constructing new housing, development has not kept pace with demand, especially in new very low-, low-, and moderate-income housing. Implementation of the Blueprint SD Initiative land use and policy framework would ensure the growth in the region is focused in locations that would be consistent with citywide sustainability goals including vehicle miles traveled (VMT) efficiency and the CAP.

## **3.2.2 Climate Action Plan**

On August 2, 2022, the City approved an updated CAP, which included revised greenhouse gas (GHG) emissions California Environmental Quality Act (CEQA) significance thresholds, CAP Consistency Regulations, and a Climate Resiliency Fund and Urban Tree Canopy fee. The CAP

established a citywide goal of net zero GHG emissions by 2035, committing the City to an accelerated trajectory for GHG emissions reductions. The CAP identifies six strategies for achieving the goal of net zero emissions:

- Strategy 1: Decarbonization of the Built Environment, addresses natural gas consumption in all buildings, both new development and. in the timespan of the CAP, existing buildings.
- Strategy 2: Access to Clean and Renewable Energy, maintains the 100 percent renewable energy measure and acknowledges San Diego Community Power as a key pathway to achieving the renewable energy target. Strategy 2 also includes targets for converting the City's vehicle fleet to electric and supports increasing electric vehicle infrastructure citywide.
- Strategy 3: Mobility and Land Use, focuses on emissions from transportation, the single largest source of GHG emissions in the City, and establishes actions that support mode shift through mobility and land use actions and policies.
- Strategy 4: Circular Economy and Clean Communities, expands on current zero waste goals, maintains gas capture measures, and includes actions to prevent waste from entering the landfill, increase healthy food access and food recovery, and support efforts to increase composting of organic waste in response to SB 1383.
- Strategy 5: Resilient Infrastructure and Healthy Ecosystems, addresses resiliency in the face of the impacts of climate change with a focus on greening the city, starting with Communities of Concern, and includes targets for the restoration of salt marshland for carbon sequestration, and increasing the City's local water supply through Pure Water San Diego. Communities of Concern are census tracts that have been identified as having Very Low, Low, or Moderate Access to opportunity as identified in the City's Climate Equity Index.
- Strategy 6: Emerging Climate Actions, addresses those GHG emissions that will remain after all current identified measures have been achieved, which account for roughly 20 percent of total GHG emissions by 2035. This new strategy allows the City to push past the limitations in GHG emissions quantification, and science and technology, by identifying additional actions, pursuing technological innovation, expanding partnerships, and supporting research that reduces GHG emissions in all sectors.

### 3.2.3 Complete Communities

Complete Communities is a planning initiative that includes four key initiatives: Housing Solutions, Mobility Choices, Play Everywhere, and Build Better SD. These efforts work together to create incentives to build homes near transit, provide more mobility choices, and enhance opportunities for places to walk, bike, relax and play. The Complete Communities Housing Solutions Regulations are an affordable housing incentive program aimed at encouraging residential development near high-frequency transit that incorporates affordable housing. The Mobility Choices Program included amendments to the SDMC to adopt the Mobility Choices Regulations (Chapter 14, Article 3, Division 11 of the SDMC) which ensures that new development mitigates transportation ~~vehicle miles traveled~~ (VMT) impacts to the extent feasible, while incentivizing development near transit.

Additionally, the Mobility Choices Program included adoption of a new CEQA significance threshold for transportation to implement SB 743.

Play Everywhere: the City's Parks Master Plan was adopted in August 2021 and provides a framework to support the planning vision for a citywide interconnected park system which expands recreation facilities beyond traditional parks. The plan identifies existing gaps to guide future park development and promotes equity throughout the City. It establishes new equity goals, new access goals, new park standards for new development that measure recreational value, and citywide Park Development Impact Fees.

Build Better SD is a planning initiative adopted by the City Council on August 1, 2022, to enable the faster delivery of public spaces and buildings equitably and sustainably across the City of San Diego. The initiative supports the City's equity, access, conservation, and sustainability goals in addition to furthering the City's housing goals by providing the infrastructure needed to support new homes for all residents. The initiative amended the General Plan with new policies to prioritize investments in areas with the greatest needs and create opportunities to gather community input. The initiative also included amendments to the LDC to promote equitable investments in public spaces and mobility improvements, updated the City's Regional Transportation Congestion Improvement Program, and updated the City's Development Impact Fee structure to streamline public investments and further equitable policies, with an emphasis on prioritizing investment in neighborhoods with the greatest needs and delivering infrastructure to more people, more quickly.

### 3.3 Project Objectives

In accordance with CEQA Guidelines Section 15124(b), the following objectives support the purpose of the project, assist the Lead Agency in developing a reasonable range of alternatives to be evaluated in this report, and ultimately aid decision-makers in preparing findings and overriding considerations, if necessary.

The specific goals and objectives of the Blueprint SD Initiative, the University CPU, and Hillcrest FPAfor the project include the following:

- Provide a policy and land use framework for residential capacity to meet the City's RHNARegional Housing Needs Allocation targets over the next 20 to 30 years.
- Provide options for services and amenities, such as shopping and grocery stores, public spaces, and parks and recreation facilities closer to homes so that most daily needs can be met through a short walk, bike, or transit ride.
- Provide housing of all types and for all income levels in a manner that affirmatively furthers fair housing.
- Establish land uses that facilitate transit-oriented, multiple-use villages, districts, and developments within the City's Sustainable Development Areas in line with the General Plan's Village Climate Goal Propensity Map and the CAP.

- Provide affordable and convenient climate-friendly mobility options, such as walking/rolling, biking, and public transit, equitably throughout the City with a focus on areas with the greatest need.
- Plan for land uses that maximize the opportunity for housing near existing and future transit stations and stops identified in the SANDAG Regional Plan and that allow residents, employees, students, and visitors to more safely, conveniently, and enjoyably travel by walking/rolling, biking, or transit in line with the CAP.
- Provide a range of densities that will facilitate denser development in ~~vehicle miles traveled~~ (VMT) efficient areas to work towards meeting the GHG reduction targets of the CAP.
- Locate housing and goods/services in select areas near employment centers with convenient transit access to improve the jobs-housing balance, enhance and strengthen employment areas, promote employment opportunities, and encourage sustainable development consistent with General Plan Refresh (Blueprint SD Initiative) and the CAP.
- Streamline the environmental review process for future planning documents to expedite the implementation of plans that facilitate the development of housing and infrastructure that meets the City's needs and further the CAP goals.

In addition to the overall project objectives, University CPU Specific Objectives include:

- Strengthen the community's role as a major employment center in the City by co-locating biotech and life sciences laboratories with the area's hospitals and other tech offices to create an innovation hub that serves the region.
- Increase affordable housing near biotech jobs and the University of California, San Diego (UCSD) to retain talent within the City and prevent employees and students from leaving the community due to high housing costs and long commute times. Look for opportunities to increase and enhance transportation connections within the community plan area and within the City.

In addition to the overall project objectives, Hillcrest FPA Specific Objectives include the following:

- Establish and enhance the cultural significance of the Hillcrest FPA area to honor and recognize Hillcrest's role as the historic center of the City's lesbian, gay, bisexual, transgender, queer (LGBTQ+) community.
- Provide opportunities to increase and enhance transportation options, in particular, active transportation networks within the Hillcrest FPA area to create a walkable and active street network.

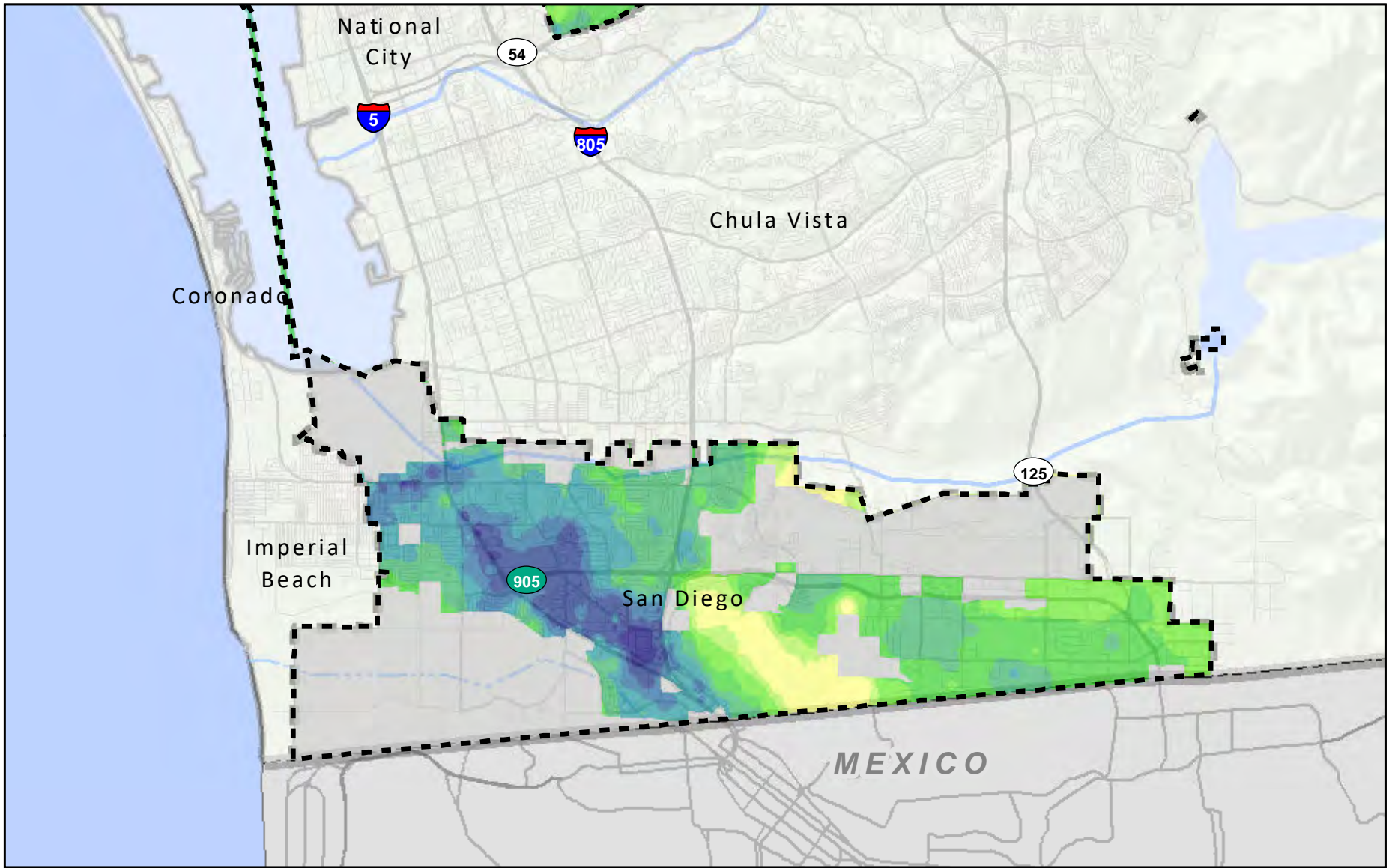




## 3.4 Project Location

The project location, for purposes of this PEIR, is the entire City of San Diego municipal area, as land use policy and plan updates and future SDMC amendments to implement the project may apply citywide. However, consistent with the Blueprint SD Initiative, the City anticipates future ~~CPUs~~ Community Plan Updates, Specific Plans, and ~~FPA~~ focused plan amendments that would increase development density and intensity through focus the redesignation of existing land uses within specific areas, referred to as Climate Smart Village Areas. These are areas that have access to existing or planned transit and demonstrate the greatest likelihood to encourage walking/rolling, biking, and transit use. Consistent with the City of Villages Strategy, the General Plan contains a Village Propensity Map which identifies areas citywide that exhibit village characteristics; and areas that may have a propensity to develop as village areas based on having certain existing or planned characteristics as identified when the General Plan was updated in 2008.

As part of the Blueprint SD Initiative, the existing General Plan Figure LU-1: Village Propensity Map has been updated and renamed the Village Climate Goal Propensity Map (see Figure LU-1 of the updated General Plan Land Use and Community Planning Element) based on locations that have the highest likelihood of encouraging walking/rolling, biking, and transit usage compared to driving. Areas throughout the City have been assigned a village propensity value to prioritize where growth could occur over the next 20 to 30 years. Generally, future CPUs, Specific Plans, and ~~FPA~~ focused plan amendments would focus on amending land use in areas that have a higher village propensity value. Specifically, these Climate Smart Village Areas, where the village propensity values range from 7 through 14, would be the focus areas for increasing opportunities for residential and mixed-use development in the City (refer to Figures 3-1a through 3-1e). These areas have good access to homes, jobs, and mixed-use destinations. These areas are also in proximity to available high-frequency transit services based on the 2050 SANDAG Regional Plan transportation network, have transit access to job centers based on the 2050 regional transportation network, and have good connections between transit and destinations. Although opportunities for new development would likely be focused in these Climate Smart Village Areas, future CPUs, Specific Plans, and ~~FPA~~ focused plan amendments could also plan for development outside these Climate Smart Village Areas (i.e., areas with a village propensity value of 1 through 6) where considered appropriate for the surrounding area. Additionally, while this PEIR identifies Climate Smart Village Areas as the areas where future new development would likely be focused per the Blueprint SD Initiative land use and policy framework, the boundaries of these Climate Smart Village Areas could shift in the future. As updates to SANDAG's Regional Plan and the regional transportation network occur, the village propensity values identified in the Village Climate Goal Propensity Map could be adjusted depending on an area's village characteristics and proximity to transit and could result in new Climate Smart Village Areas where opportunities for new development would likely be focused.

The University CPU area and the Hillcrest FPA area are project components addressed in more detail than other areas in the City for the purposes of this PEIR. The University CPU area is located approximately 13 miles north of Downtown San Diego and includes key locations such as Torrey Pines State Natural Reserve, Torrey Pines Golf Course, and UCSD (see Figure 2-5). Interstate (I-) 5 traverses the center of the community, State Route (SR-) 52 forms the southern border of the community and I-805 runs along the eastern edge within and outside of the community. Marine Corps Air Station (MCAS) Miramar is located along the southeastern border of the community.



 San Diego City Limits  
 Exclusion Area

**Village Propensity Value**



0 Miles 1



FIGURE 3-1a  
Village Climate Goal Propensity Map - South

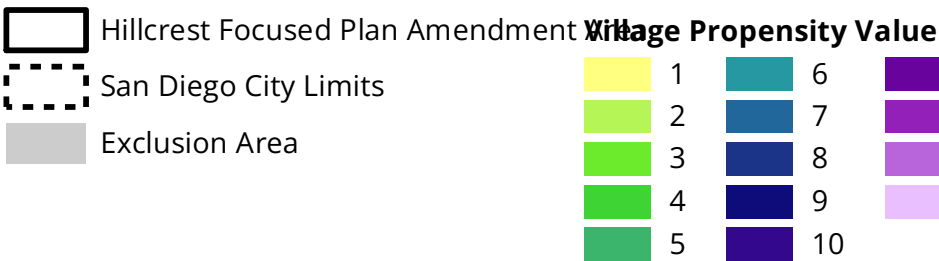
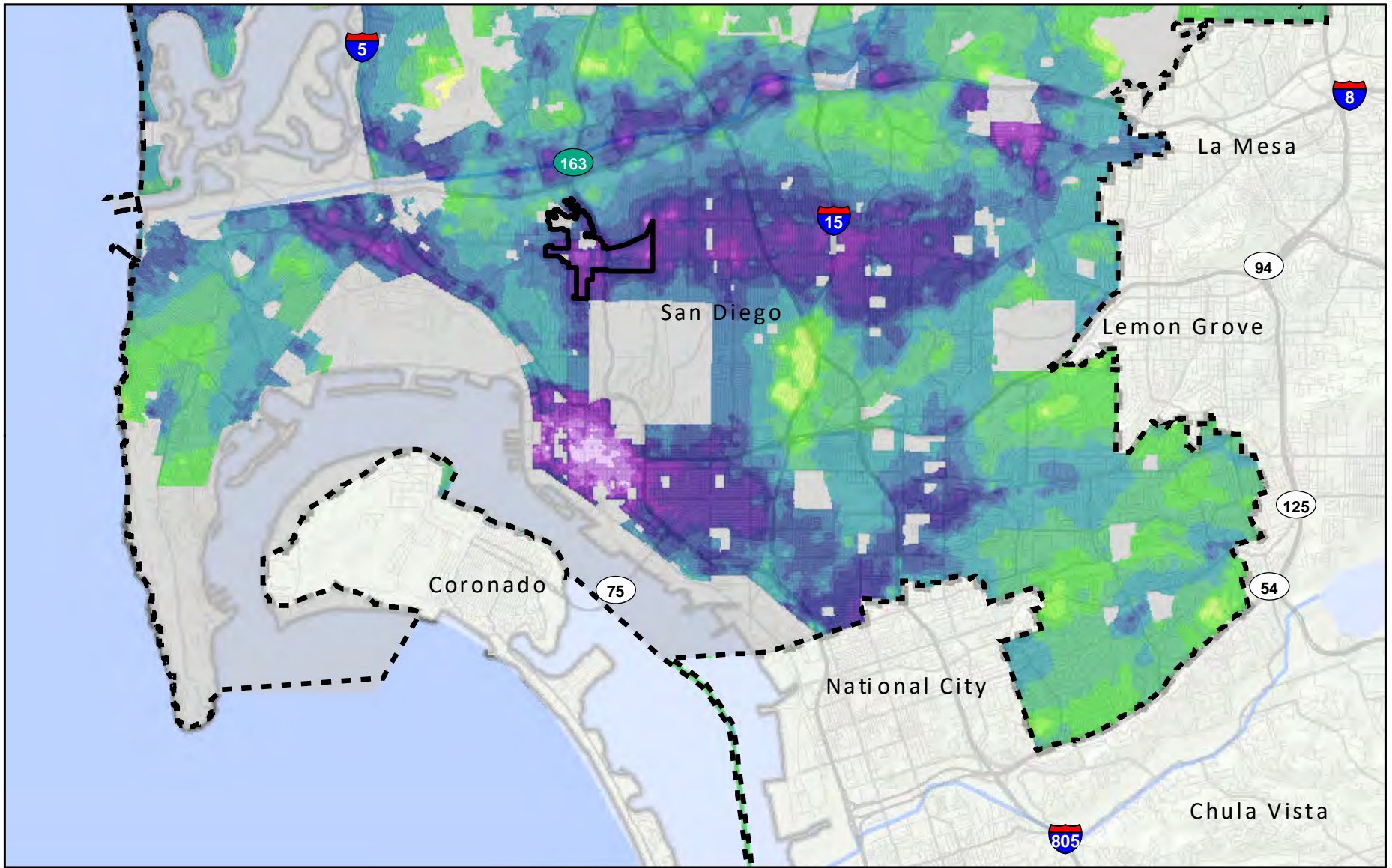
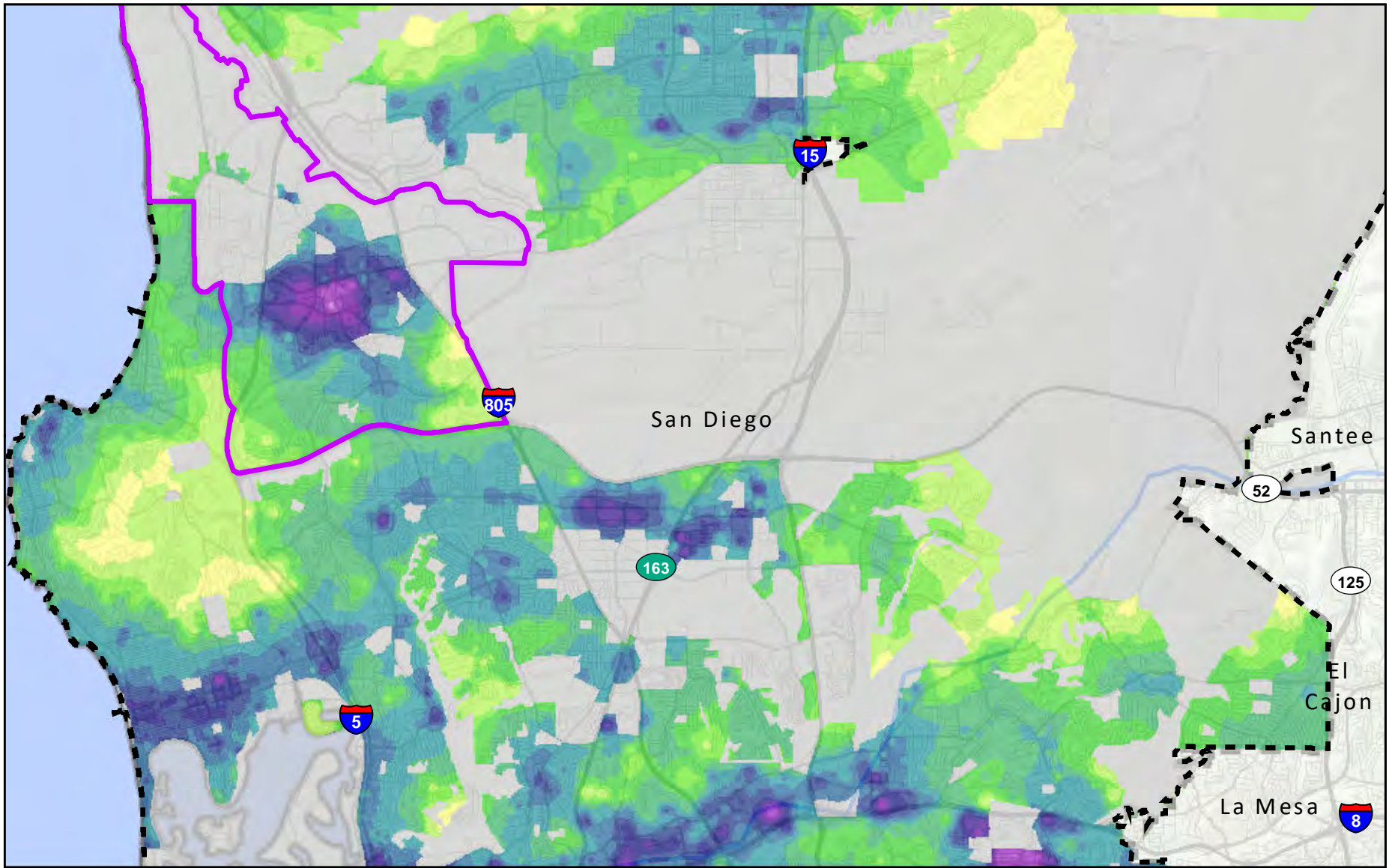


FIGURE 3-1b  
Village Climate Goal Propensity Map - South Central





- University Community Plan Area
- San Diego City Limits
- Exclusion Area

**Village Propensity Value**

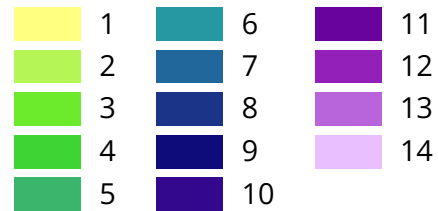
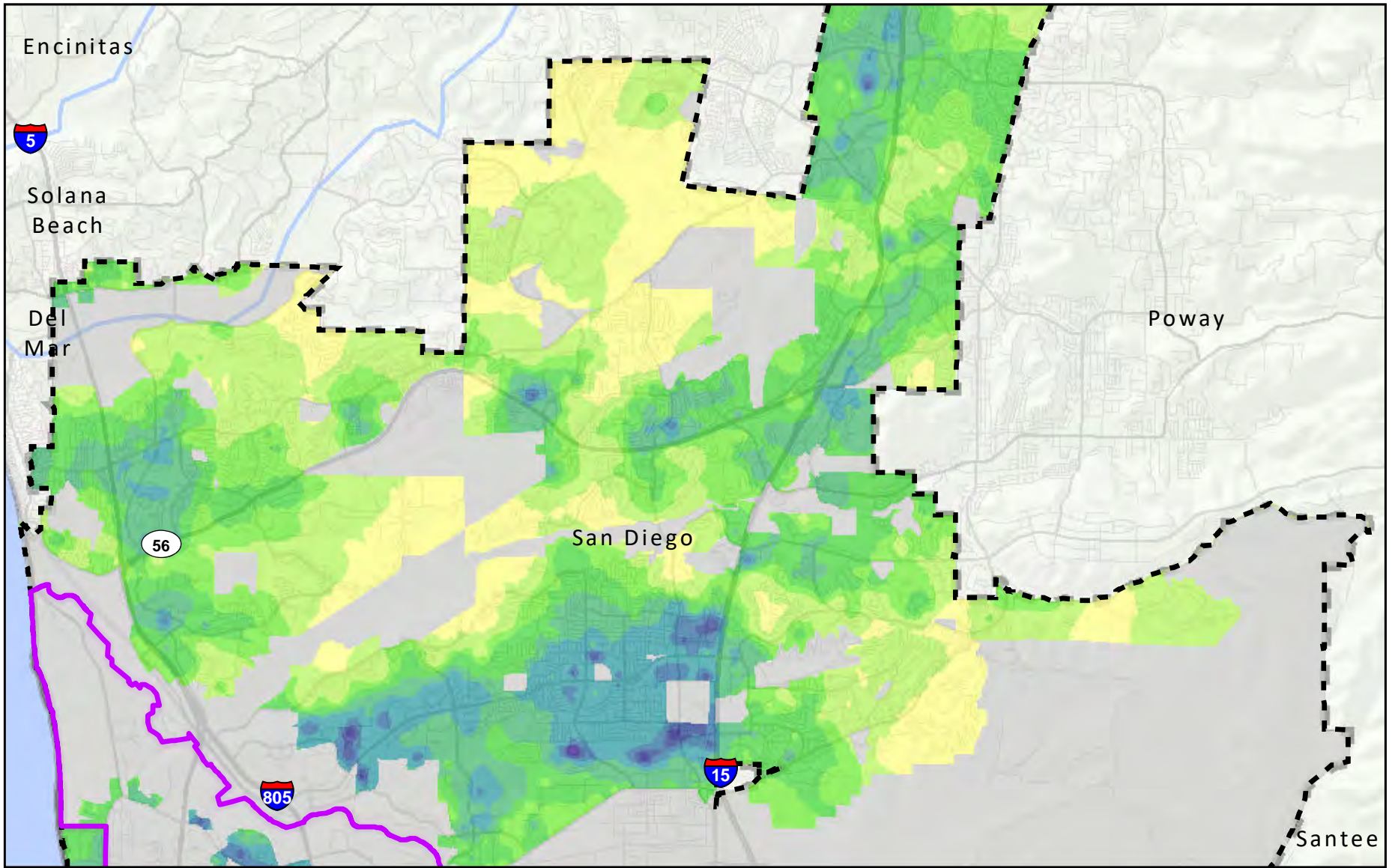





FIGURE 3-1c  
Village Climate Goal Propensity Map - North Central



-  University Community Plan Area
-  San Diego City Limits
-  Exclusion Area

**Village Propensity Value**

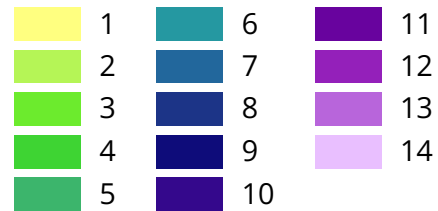
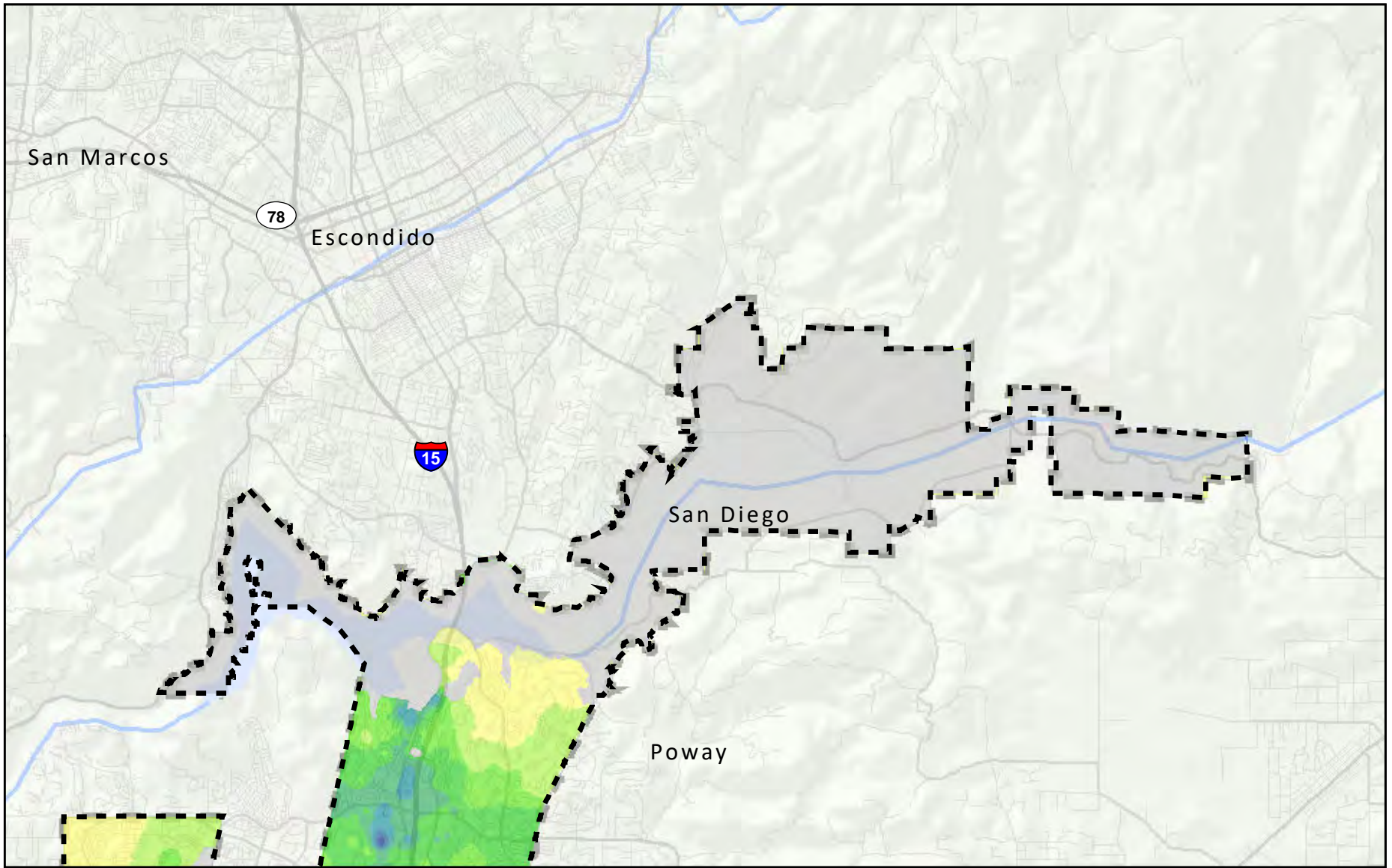




FIGURE 3-1d  
Village Climate Goal Propensity Map - North





 San Diego City Limits  
 Exclusion Area

**Village Propensity Value**

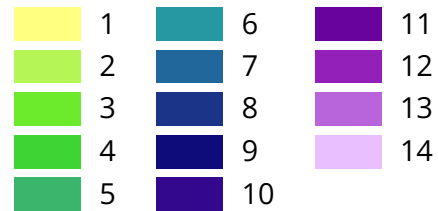


FIGURE 3-1e  
Village Climate Goal Propensity Map - Northeast

The Hillcrest FPA area includes approximately 380 acres of the Hillcrest and Medical Complex neighborhoods in the Uptown Community Plan area (see Figure 2-3). The FPA area is bound by a series of streets and canyons, including Park Boulevard to the ~~west east~~, Walnut Avenue to the south, Dove Street to the west, and the hilltop bluffs along the northern edge of the Medical Complex neighborhood. SR-163 splits the Hillcrest FPA area.

## 3.5 Project Description

### 3.5.1 Blueprint SD Initiative

The Blueprint SD Initiative includes a comprehensive amendment to the General Plan to better align the City of Villages Strategy to reflect the latest goals, policies, and plans for housing, environmental protection, and climate change adaptation and sustainable growth. The Blueprint SD Initiative would amend the General Plan to reflect an updated citywide land use and policy framework designed around the 2050 regional transportation network to promote reductions in per capita GHG emissions and VMT. The Blueprint SD Initiative identifies complementary land use, transportation, and related policies to support future development according to the revised land use framework. The land use and policy amendments would build upon climate goals outlined in the CAP and Climate Resilient SD Plan.

The Blueprint SD Initiative land use framework is defined by the Village Climate Goal Propensity Map, which assigns village propensity values ranging from low to high (i.e., 1 through 14) throughout the City. Areas of the City with a medium to high village propensity value (i.e., 7 through 14) are areas where the City would support the redesignation of land uses to increase development capacity, supporting more homes and jobs. The City may support increases in development intensities in other areas of the City provided the overarching goals of the Blueprint SD Initiative would be achieved. Future land use changes and development intensities (such as dwelling units per acre) would be implemented through future comprehensive ~~CPUs~~community plan updates, Specific Plans, and/or ~~FPA~~focused community plan amendments which would involve community input. Future increases in development intensities would support higher density residential and mixed-use development, supporting more homes near transit, especially in areas that contribute to the reduction of per capita VMT and GHG emissions. By aligning housing production with planned transportation investments, the updated ~~e~~citywide land use strategy intends to address the CAP and mobility mode share goals by promoting opportunities to walk/roll, bike, and ride transit.→ This updated growth framework would guide future land use changes as part of CPUs, Specific Plans, and FPAs.

The Blueprint SD Initiative identifies areas for future medium- and high-density residential and mixed-use development to support increases in housing and jobs in the City. The Blueprint SD Initiative includes several components evaluated as part of this PEIR, including a comprehensive General Plan Refresh, future plan amendments including CPUs, Specific Plans, and/or FPAs to align opportunities for additional homes and mixed-use development consistent with the Climate Smart Village Areas in the Village Climate Goal Propensity Map, and future LDC updates. Each of these components is described below.

### 3.5.1.1 General Plan Refresh

As part of the General Plan Refresh, the General Plan's policies would be comprehensively amended to reflect new data and information without changing the General Plan framework from the 2008 General Plan. The Blueprint SD Initiative's framework for identifying areas for future homes and jobs was used to guide these amendments to the General Plan. A key component of the General Plan Refresh is the proposed amendment to the Land Use and Community Planning Element (hereinafter referred to as the "Land Use Element"). The Land Use Element is required by state law (Government Code Section 65302) and designates the general distribution, location, and extent of uses of land for housing, businesses, industry, open space, and other uses. The Land Use Element is implemented through the LDC (Chapters 11–15 of the SDMC), which establishes detailed regulations for the use and development of land. The revised Land Use Element includes updated land use designations, revised density ranges, new and updated goals, and new and updated policies consistent with the City of Villages Strategy to meet housing, climate protection, and sustainability goals.

Amendments to the Land Use Element include updates to reflect existing conditions in the City. Based on the limited availability of vacant, developable land in the city, the amended Land Use Element identifies infill development to meet the housing, jobs and services needs of the city. An amendment to the City of Villages Strategy has been identified to facilitate the planning of future homes and jobs in the City by focusing on the development of pedestrian-friendly, mixed-use, activity centers that are connected to the regional transit system. A key goal is the reduction of vehicle trips and associated GHG emissions by improving opportunities to walk/roll, bike, and take transit. Revised and updated goals for the City of Villages Strategy are as follows:

- A sustainable land use pattern that helps the City meet the needs of current and future generations, while helping advance climate goals.
- Mixed-use villages located throughout the City that are connected by high quality transit.
- Mixed-use villages that serve a wide variety of daily community needs for homes, jobs, public facilities, recreation, and other services and amenities.
- Mixed-use villages that offer a variety of homes that are affordable for people with different incomes and needs.
- Pedestrian-friendly, mixed-use, villages that are characterized by inviting, accessible, and attractive public streets and spaces.

The General Plan Refresh replaces the 2008 General Plan Figure LU-1: Village Propensity Map with an updated Village Climate Goal Propensity Map that identifies areas for the prioritization of future residential and mixed-use development, supporting more homes and jobs. This map forms the basis for defining where future growth is anticipated throughout the City in addition to the anticipated intensity of development. The updated Village Climate Goal Propensity Map incorporates the 2050 regional transportation network.

The amended Land Use Element includes updates to several tables to reflect current land uses and acreages as these previous tables relied largely on 2006 data. Changes to Figure LU-2: General Plan



Land Use and Street System, includes updates to the street system and General Plan land uses as of 2023 (Figure 3-2). Changes to Figure LU-3: Planning Areas and Prospective Annexation Areas, are proposed to reflect possible changes to the City's boundary resulting from potential annexations (Figure 3-3). An update to Figure LU-4: Proposition A Lands, is also proposed to reflect the latest community plan area boundaries.

In addition to the Land Use Element, the following elements are proposed to be amended to reflect more current conditions, updated data sources, and the latest City plans and policies while continuing to maintain the framework of the General Plan and City of Villages Strategy. A summary of changes within each element is provided below.

- Mobility Element:** The Mobility Element is required by state law (Government Code Section 65302). The Mobility Element designates the general location and extent of existing and proposed major throughfares, transportation routes, terminals, military airports, maritime ports, and other local public utilities and facilities. The amended Mobility Element reflects SANDAG's Regional Plan and the updated transportation network and includes an updated policy framework to encourage complete streets planning principles and concepts that will result in dynamic, vibrant corridors that support all modes of travel. The amended Mobility Element also identifies new goals and policies that help walking/rolling, bicycling, and using shared mobility devices to become more viable for short trips, and for transit to link highly frequented destinations more efficiently to reflect changes in mobility technology since 2008. The amended Mobility Element advances the City's strategy for increased mobility choices in a manner that strengthens the City of Villages Strategy and Land Use Element; helps achieve a clean and sustainable environment; and furthers equitable access, particularly focusing on improving access to areas with the greatest need.

The amended Mobility Element includes revisions to several tables to provide current data reflecting existing conditions and updated City policy direction. For example, changes to Table ME-3, Parking Strategies Toolbox, includes the addition of shared mobility corrals, shared micro-mobility, and goods movement/freight as parking tools.

The Mobility Element includes updated Figures ME-1A and ME-1B representing planned transit and land use connections (Figures 3-4 and 3-5). These figures depict the updated General Plan land uses and Climate Smart Village Areas with planned high frequency transit service and existing transit service. Updates to the existing and proposed bikeways are depicted on an updated Figure ME-2 (Figure 3-6).

- Urban Design Element:** The Urban Design Element is an optional Element of the General Plan allowed by state law (Government Code Section 65302). Urban design is the visual and sensory relationship between people and the built and natural environment. Citywide urban design policies in the Urban Design Element help to guide the built environment. The amended Urban Design Element includes updates to goals and policies to promote the use of objective and measurable development standards to align with changes in state law. For example, the revised Urban Design Element includes new Policy UD-B.5<sub>2</sub>, which promotes providing active uses that front transit corridors and support the public realm. This would include considering the incorporation of retail, community-serving uses, lobbies, entrance courts, sidewalk cafes, recreational amenities, and other active spaces at the ground level.

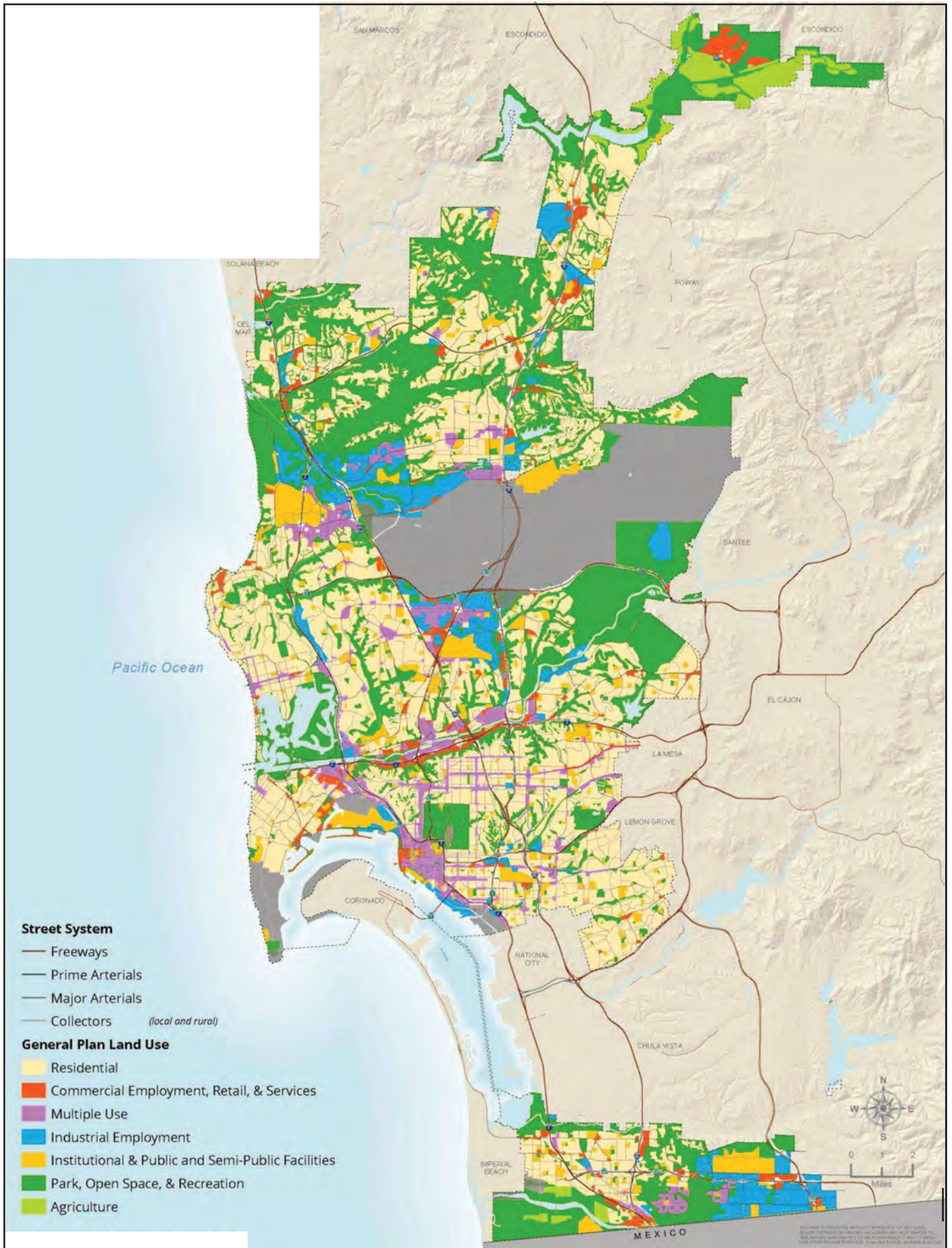


FIGURE 3-2  
General Plan Land Use Street System



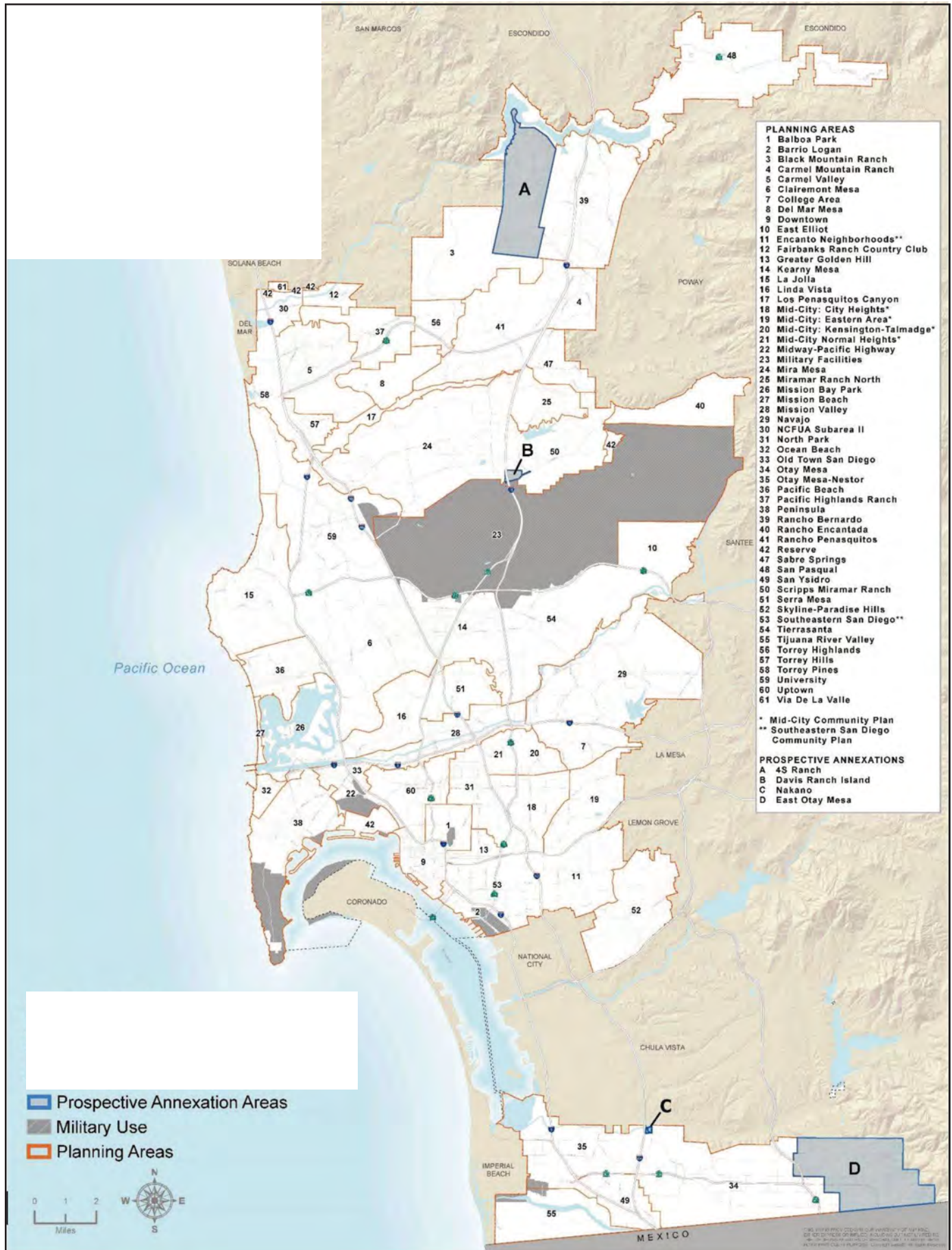


FIGURE 3-3

Planning Areas and Prospective Annexation Areas



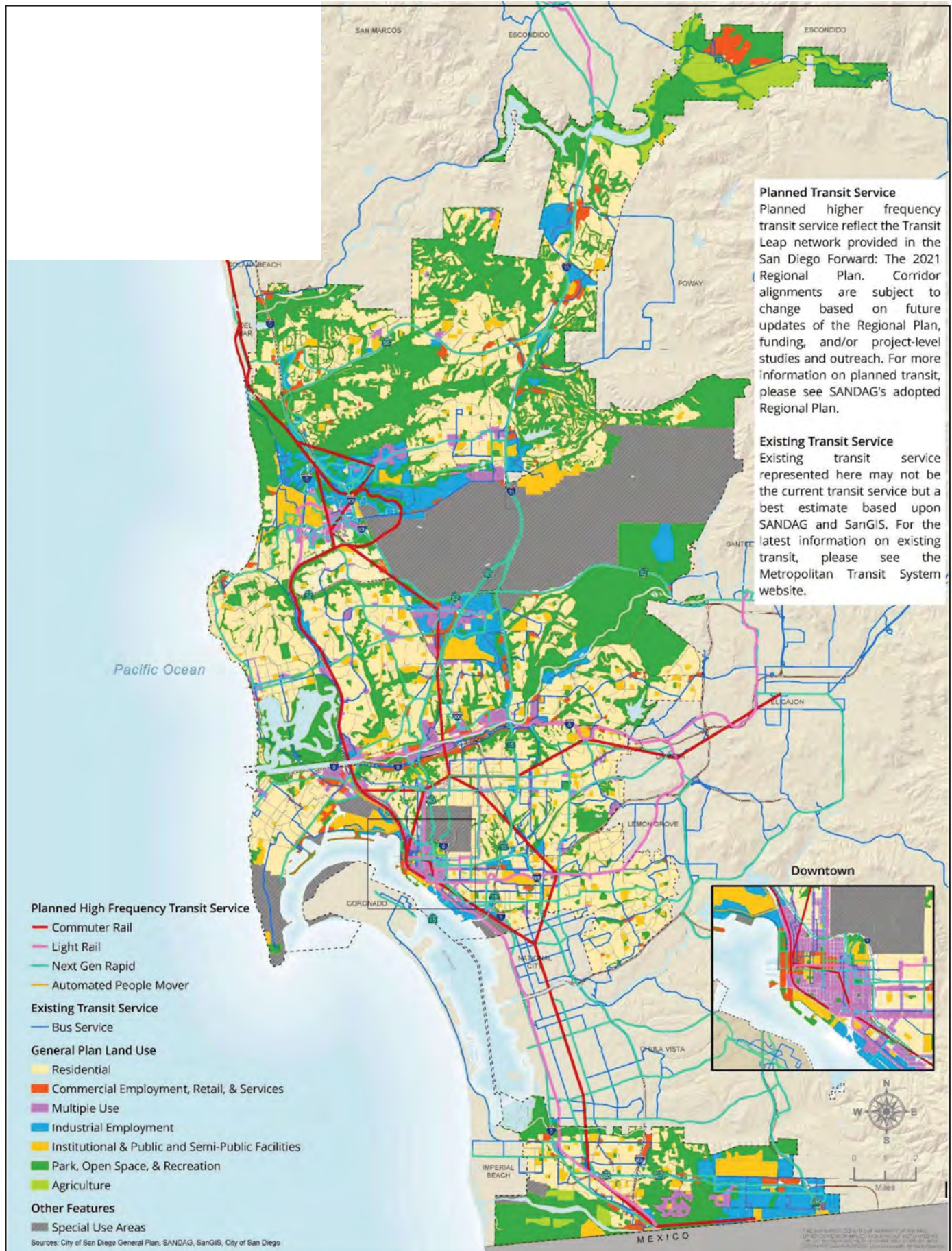


FIGURE 3-4

Transit and Land Use Connections with Plan Land Use



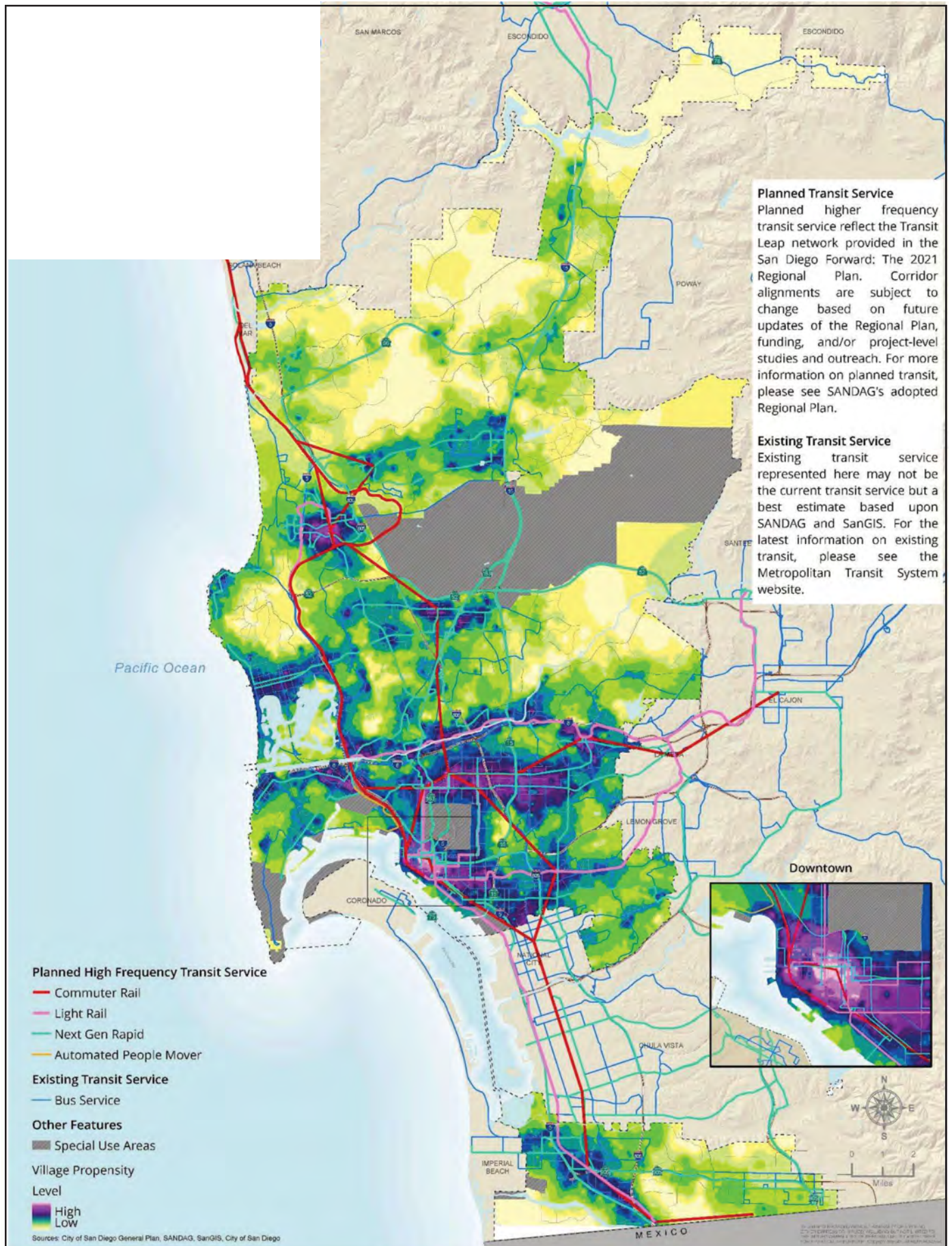


FIGURE 3-5

Transit and Land Use Connections with Village Propensity



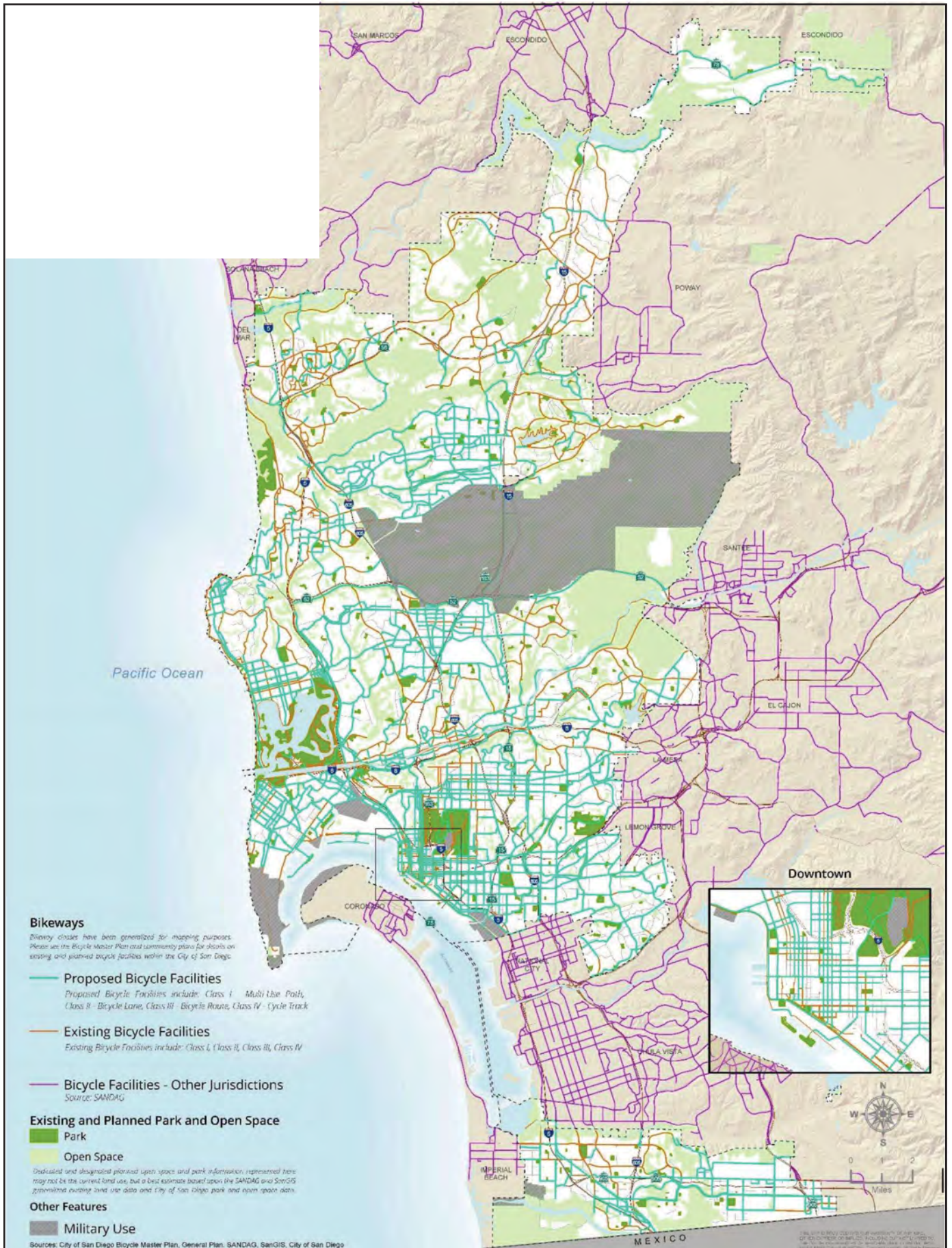


FIGURE 3-6  
 Existing and Proposed Bikeways

- **Economic Prosperity Element:** The Economic Prosperity Element is an optional Element of the General Plan allowed by state law (Government Code Section 65302). Economic prosperity is a key component to quality of life. The City's economy influences physical development and determines the City's capacity to fund essential services. The amended Economic Prosperity Element includes updated policies to reflect the changes to the Land Use Element and provide greater flexibility to co-locate industrial uses with housing, especially workforce housing, where compatible. In addition, the revised Economic Prosperity Element includes updates to both text and Figures (EP-1, EP-2, EP-4, EP-5, and EP6) to reflect more recent data sources. Policy EP-G.2 is amended to reflect the Promise and Opportunity Zone and Policy EP-G.10 is amended to reflect Enhanced Infrastructure Financing Districts and Property and Business Improvement Districts.
- **Public Facilities, Services, and Safety Element:** The Public Facilities, Services, and Safety Element is required by state law (Government Code Section 65302). The Public Facilities, Services, and Safety Element reduces the potential short- and long-term risk of death, injuries, property damage, and economic and social dislocation resulting from fires, floods, droughts, earthquakes, landslides, climate change, and other hazards. The amended Public Facilities, Services, and Safety Element includes amendments to remove reference to the City's previous Capital Improvement Program Prioritization process to reflect the adoption of Build Better SD. Figures updates are also proposed to reflect the status and location of existing facilities such as police, library, fire, and wastewater facilities. Updates related to public safety include the geotechnical relative risk area map. The updates to the element also include changes to address Senate Bill 99 [Government Code Section 65302, subdivision (g)(5)], which requires Safety Elements to identify residential developments in any hazard area that do not have at least two emergency evacuation routes. Updates also address Assembly Bill 747 (Government Code Section 65302.15), which requires jurisdictions to identify evacuation routes and their capacity, safety, and viability under various emergency scenarios.
- **Recreation Element:** The Recreation Element is an optional Element allowed by state law (Government Code Section 65302). The Recreation Element seeks to maintain and enhance public recreation opportunities and facilities for all users. The amended Recreation Element includes an updated Figure RE-1, Community Plan Designated Open Space and Parks Map, which includes updates to military uses, and neighborhood, community, regional, and open space parks (Figure 3-7).
- **Conservation Element:** The Conservation Element is required by state law (Government Code Section 65302). Conservation addresses the planned management, preservation, and utilization of natural resources and landscapes. The Conservation Element considers the effects of the development as described in the Land Use Element. The amended Conservation Element incorporates updated policies to align the City's conservation framework with the revised land use strategy and align with the goals of the CAP, Climate Resilient SD Plan, and the City's Vernal Pool Habitat Conservation Plan that was adopted in 2018. The amended Conservation Element includes updates to Table CE-1 and Figures CE-1 through CE-6 to reflect current conditions and the most up-to-date data.



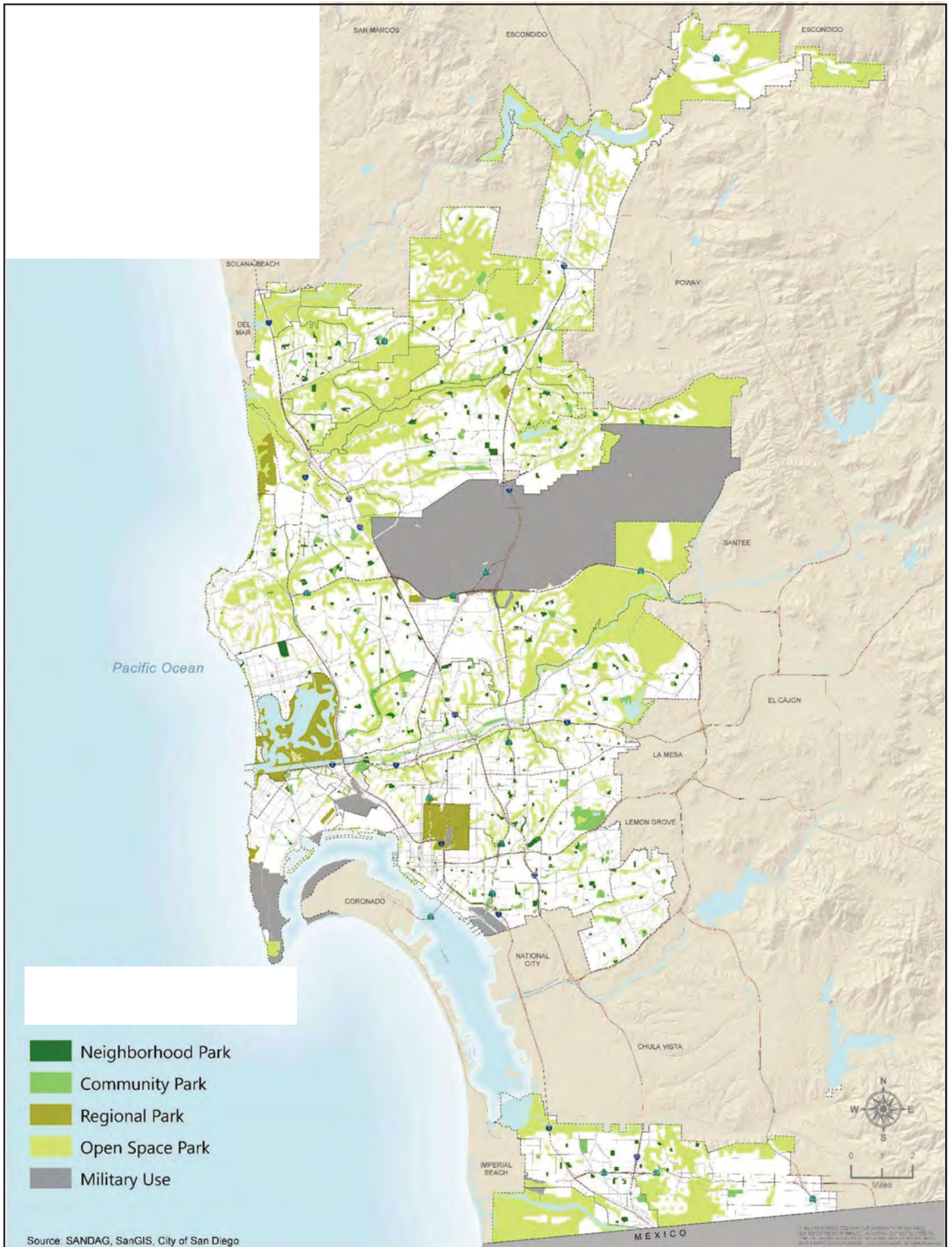


FIGURE 3-7  
Community Plan Designated Open Space and Parks Map



- **Noise Element:** The Noise Element is required by state law (Government Code Section 65302). The Noise Element identifies and appraises noise problems in the City. The amended Noise Element includes updated noise compatibility policies related to multiple dwelling units; vehicle and vehicular equipment sales and services use; wholesale, distribution, and storage use; and industrial use to support the revised land use strategy in the proposed Land Use Element. The amended Noise Element includes updates to Table NE--3: Land Use Noise Compatibility Guidelines. Amendments to Table NE-3 include revisions to the exterior noise exposure limits for vehicle and vehicular equipment sales and service uses, wholesale, distribution, storage uses, and industrial uses.
- **Appendices:** The amended appendices add the Blueprint SD Initiative Village Climate Goal Propensity map methodology and provide an update to the Community Plan Land Use Designations and General Plan Land Use Designations. The appendices have also been updated to reflect the latest policies and data in the region.
- **Glossary:** The amended Glossary includes new and revised definitions for key terms.

The following elements are not proposed to be adopted or amended with this project:

- **Historic Preservation Element:** The Historic Preservation Element is an optional Element of the General Plan allowed by state law (Government Code Section 65302). The Historic Preservation Element guides the preservation protection, restoration, and rehabilitation of historical and cultural resources. A future amendment to this element could be undertaken as part of a future and separate initiative.
- **Environmental Justice Element:** ~~The City does not currently have an Environmental Justice Element but one is currently in process (as a separate action from the project). To comply with SB 1000, the Environmental Justice Element will be adopted or reviewed as a separate action prior to the project and will address equity and environmental justice more fully across the City. The City adopted an Environmental Justice Element on July 1, 2024 (as a separate action from the project). The Environmental Justice Element complies with SB 1000 and addresses equity and environmental justice issues across the City~~

### 3.5.1.2 Blueprint SD Assumptions

As detailed in Figures 3-1a through 3-1e and discussed in Section 3.4 above, the Village Climate Goal Propensity Map defines areas in the City where the City would support the redesignation of land uses to increase development capacity, supporting more homes and jobs, and would specifically focusing development within areas with a medium to high village propensity value (i.e., 7 through 14). Future land use changes across the City would be implemented through future ~~CPUs~~community plan updates, Specific Plans, and/or ~~FPA~~focused plan amendments which would focus additional residential and mixed-use development density and intensities within the Climate Smart Village Areas (i.e., areas with medium and higher village propensity). The village propensity values identified in the Village Climate Goal Propensity Map serve as a general guide for the City to identify opportunities for future homes and jobs as part of future CPUs, Specific Plans, and FPAs, with the potential for higher densities and intensities being assigned to areas with a higher village

propensity. In general, opportunities for future homes and jobs are anticipated less in areas with a lower village propensity, but future CPUs, Specific Plans, and ~~FPAs~~focused plan amendments could still plan for additional homes in areas with a lower village propensity when higher densities and intensities are considered appropriate for the surrounding area. Additionally, the boundaries of these Climate Smart Village Areas could shift in the future. As updates to SANDAG's Regional Plan and the regional transportation network occur, the village propensity values identified in the Village Climate Goal Propensity Map could be adjusted depending on an area's village characteristics and proximity to transit and could result in new Climate Smart Village Areas where opportunities for new development would likely be focused.

To identify the Blueprint SD Initiative village propensity values, a land use modeling effort was used to locate homes and jobs within areas near high frequency transit, with the goal of supporting a shift in mode share from single occupancy vehicles to other non-vehicular models of travel including walking, biking, and transit. Refer to Attachment A of Appendix J for a description of the methodology used in the Blueprint SD Initiative modeling effort. Future land use changes within the Climate Smart Village Areas would be further defined as part of future CPUs, Specific Plans, and/or ~~FPAs~~focused plan amendments, as discussed further in Section 3.5.1.3.

### **3.5.1.3 Future Community Plan Updates, Specific Plans, and/or Focused Plan Amendments**

Since the adoption of the General Plan in 2008, the City has been in the process of updating community plans to be consistent with the City of Villages Strategy and, since 2015, the CAP. The overarching goals of recent CPUs have focused on maximizing density within Transit Priority Area and VMT efficient areas, ensuring mobility plans provide for all modes of travel, and providing a land use and mobility framework consistent with the CAP and City of Villages Strategy. As part of the Blueprint SD Initiative, the City anticipates updating and/or amending community plans to reflect the updated Village Climate Goal Propensity Map and policy framework, as well as other recent City plans and policies.

The environmental analysis approach for prior CPUs has been to prepare a PEIR for each CPU. Through this process, the environmental analysis has found similar environmental impacts which require similar mitigation frameworks. Due to this, the City identified an opportunity to address the environmental analysis for future CPUs as part of the analysis for the Blueprint SD Initiative. Future plan amendments including CPUs, Specific Plans, and FPAs, as well as future projects consistent with those plans, and future amendments to the LDC consistent with the General Plan policy framework, would be evaluated in the context of this PEIR.

Future CPUs, Specific Plans, and/or FPAs, and future development consistent with those plans, would be evaluated for consistency with the General Plan policy framework including the Village Climate Goal Propensity Map (see Figures 3-1a through 3-1e) and the City of Villages Strategy, and thus, would be evaluated for consistency with this PEIR. CEQA Guidelines Section 15183 allows projects consistent with the development density established by zoning, community plan, or General Plan policies for which an EIR was certified to not require additional environmental review, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. As future CPUs or other plans are amended and as future public

and/or privately initiated development projects are proposed that are consistent with the General Plan policy framework, these would be evaluated in light of CEQA Guidelines Sections 15152, 15153, 15162, 15163, 15164, 15168, and/or 15183.

As discussed in Section 3.2.1.2 above, ~~fourteen~~<sup>fifteen</sup> community plans have been comprehensively updated and/or have undergone an FPA since 2008. Six Specific Plans have also been adopted since 2008. The Clairemont Mesa, College Area, and Mid-City CPUs are in process and are anticipated to be evaluated for consistency with the Village Climate Goal Propensity Map and this PEIR. An amendment to the Uptown Community Plan and an update to the University Community Plan are also in process and are evaluated within this PEIR. Both recently updated community plans and those that need an update could be amended in the future for consistency with the General Plan policy framework including the Village Climate Goal Propensity Map (see Figure 3-1a through 3-1e) and this PEIR. In addition to potential land use changes, future CPUs, Specific Plans, and/or FPAs could include changes to mobility policies and recommended improvements to implement traffic calming measures including but not limited to raised intersections, corner bulb-outs, and roundabouts consistent with the General Plan Mobility Element.

### 3.5.1.4 Land Development Code Updates

To implement the goals of the General Plan Refresh and the Village Climate Goal Propensity Map, it is anticipated that LDC amendments would be proposed in the future to implement the City's vision as defined in the General Plan, CAP, and other City policy plans and documents. Future LDC amendments may include, but not be limited to, the following:

- Amendments to facilitate ministerial processing of residential and mixed-use development.
- Updates to the Historical Resources Regulations
- Modifying parking regulations
- Changes to support development and mobility improvements

-Changes to the LDC would focus on amendments that facilitate implementation of the General Plan policy framework including policies that support reductions in citywide VMT per capita and facilitate development throughout the City and especially within the Climate Smart Village Areas.

## 3.5.2 Hillcrest Focused Plan Amendment to the Uptown Community Plan

The Hillcrest FPA proposes an amendment to the Uptown Community Plan to redesignate approximately 380 acres of the Hillcrest and Medical Complex neighborhoods with land uses that follow a similar pattern to the planned land uses from the 2016 Uptown CPU with increases to the planned residential density and non-residential development capacity. The amendment would provide the opportunity for additional homes in the Hillcrest FPA area and is intended to encourage active transportation and provide more opportunities for quality public spaces. By providing the opportunity for additional homes near the employment center of the Medical Complex neighborhood, in an area with access to high frequency public transit and coupled with mobility

improvements, the Hillcrest FPA would encourage active transportation and reduce automobile trips for work commutes.

As detailed in Table 3-1, adoption of the Hillcrest FPA would increase the residential unit capacity within the Hillcrest FPA area by approximately 17,218 units compared to the adopted Uptown Community Plan. Compared to the existing units within the Hillcrest FPA area, the Hillcrest FPA could add a total of approximately 29,635 units. Similarly, as detailed in Table 3-2, the Hillcrest FPA would increase the capacity for non-residential floor area by approximately 1,037,600 square feet. The capacity for office/commercial space would be reduced while capacity for institutional/medical space would increase. Compared to existing conditions, the Hillcrest FPA would provide capacity for an additional approximately 1,372,500 square feet of retail commercial space, consistent with existing Uptown CPU retail commercial planned capacity.

Table 3-1 Residential Buildout – Adopted and Proposed Hillcrest FPA/Uptown Community Plan					
Land Use Category	Existing Units	Adopted Uptown Community Plan Units	Proposed Uptown Community Plan Units with the Hillcrest FPA	Change from Existing	Change from Adopted Plan
Multi-family	15,499	27,703	44,921	29,422	17,218
Single-family	7,684	7,897	7,897	213	0
<b>Grand Total</b>	<b>23,183</b>	<b>35,600</b>	<b>52,818</b>	<b>29,635</b>	<b>17,218</b>

Source: City of San Diego 2023  
Note: Source for existing units is SANDAG; Reported data is for overall Uptown Community Plan units.

Table 3-2 Existing, Adopted, and Proposed Hillcrest FPA/Uptown Community Plan Non-Residential Floor Area (square feet)					
Land Use Category	Existing Floor Area (2020)	Adopted Plan Floor Area	Proposed Plan Floor Area	Change from Existing	Change from Adopted Plan
Education	413,100	364,200	364,200	-48,900	0
Industrial	19,700	0	0	-19,700	0
Institutional/Medical	2,147,100	1,883,000	2,920,600	773,500	1,037,600
Office Commercial	2,308,400	1,586,000	1,586,000	-722,400	0
Recreational	18,000	18,000	18,000	0	0
Retail Commercial	1,816,400	3,188,900	3,188,900	1,372,500	0
Transportation/Utilities	67,100	67,100	67,100	0	0
Visitor Commercial	360,100	173,900	173,900	-186,200	0
<b>Total Floor Area</b>	<b>7,149,900</b>	<b>7,281,100</b>	<b>8,318,700</b>	<b>1,168,800</b>	<b>1,037,600</b>

The Hillcrest FPA identifies the following guiding principles:

- Celebrate the legacy of the LGBTQ+ community to preserve historical resources and create inclusive spaces;
- Create public spaces to connect people to businesses and services;
- Strengthen connections to make it easier to move around and access businesses, services, housing and surrounding communities
- Support local business to ensure a thriving and sustainable business district; and
- Address housing needs to increase housing opportunities near transit.

The Hillcrest FPA involves an amendment to the Uptown Community Plan and includes the following components:

- Updates to reflect the latest City and regional planning and policy framework, including updated references to the General Plan, CAP, Parks Master Plan, Climate Resilient SD, and SANDAG Regional Plan.
- Updates to reflect current population and existing conditions information.
- Land use policy changes to facilitate implementation of the Hillcrest FPA.
- A new LGBTQ+ cultural chapter to support and highlight the people, spaces, buildings, events, and physical elements that contribute to the history and culture of the LGBTQ+ community in Hillcrest.

### **3.5.2.1 Land Use**

The Hillcrest FPA would increase the allowable development intensity and residential density within approximately 380 acres of the Hillcrest and Medical Complex neighborhoods allowing for additional homes and jobs to be near sustainable transportation options. Generally, higher intensity development would be allowed along primary transit corridors, increasing opportunities for -mixed-use commercial and employment districts. The revised Uptown Community Plan Land Use map is depicted on [Figure 3-8a through 3-8c](#).

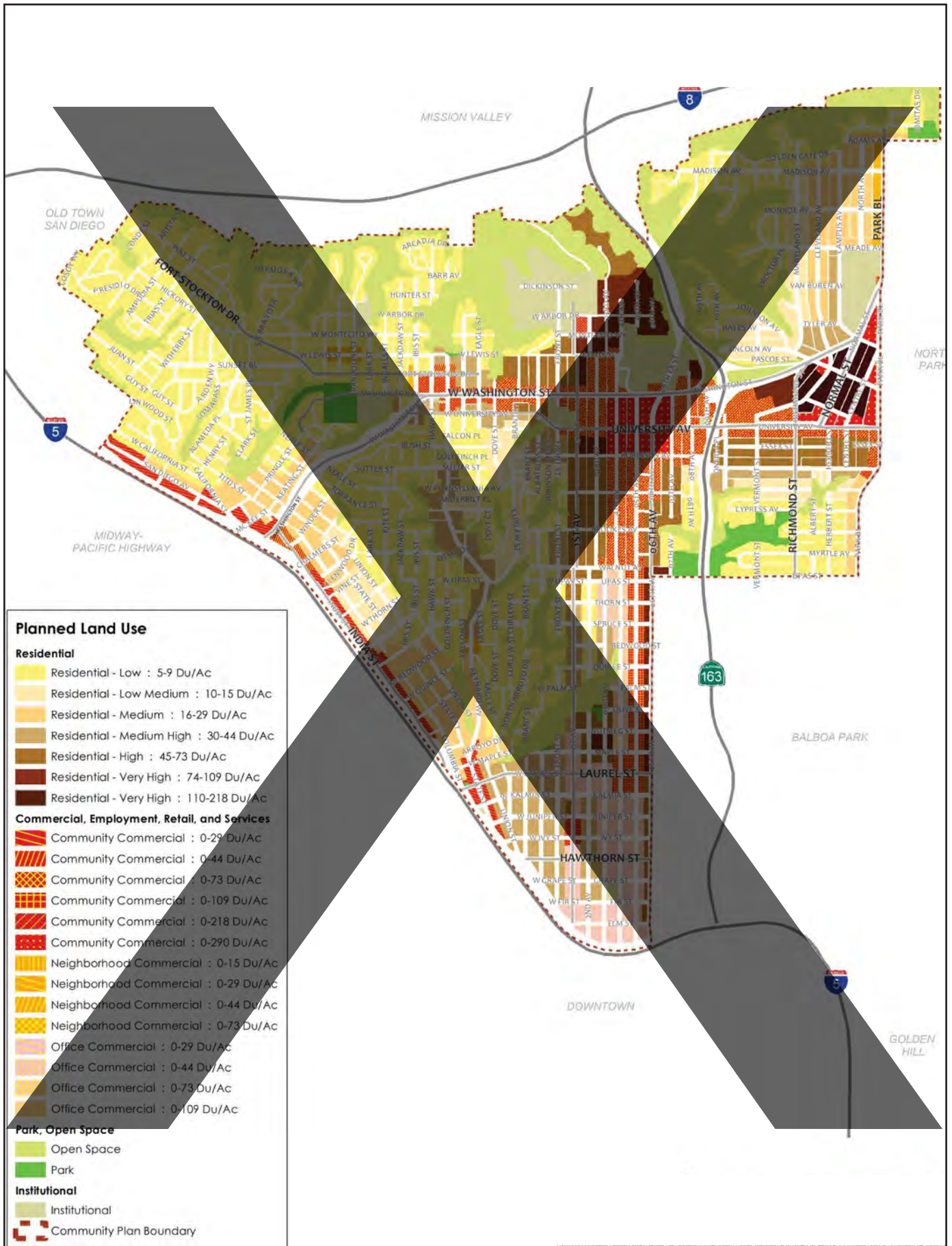


FIGURE 3-8a  
Revised Uptown Community Plan Land Use Map



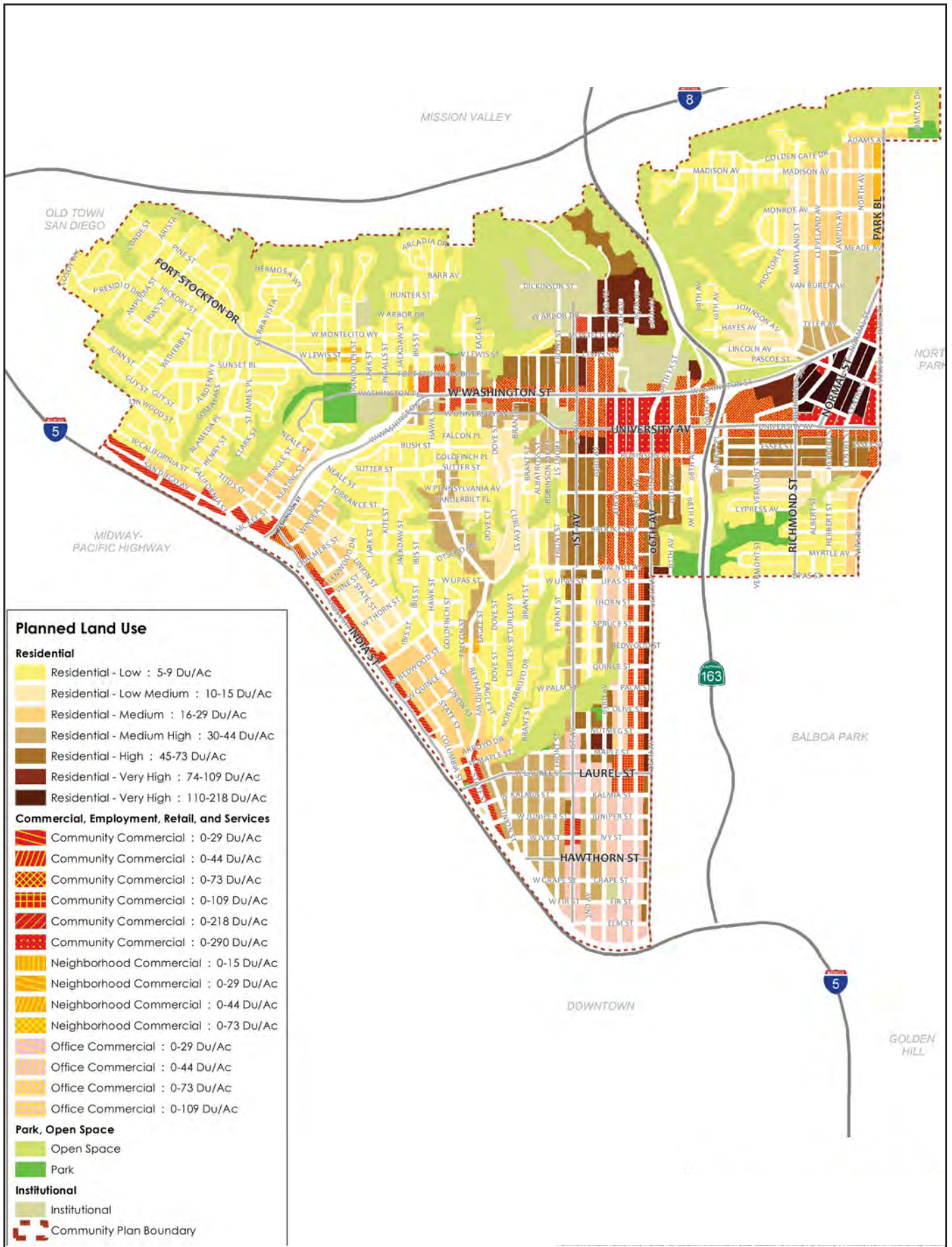


FIGURE 3-8a  
Revised Uptown Community Plan Land Use Map



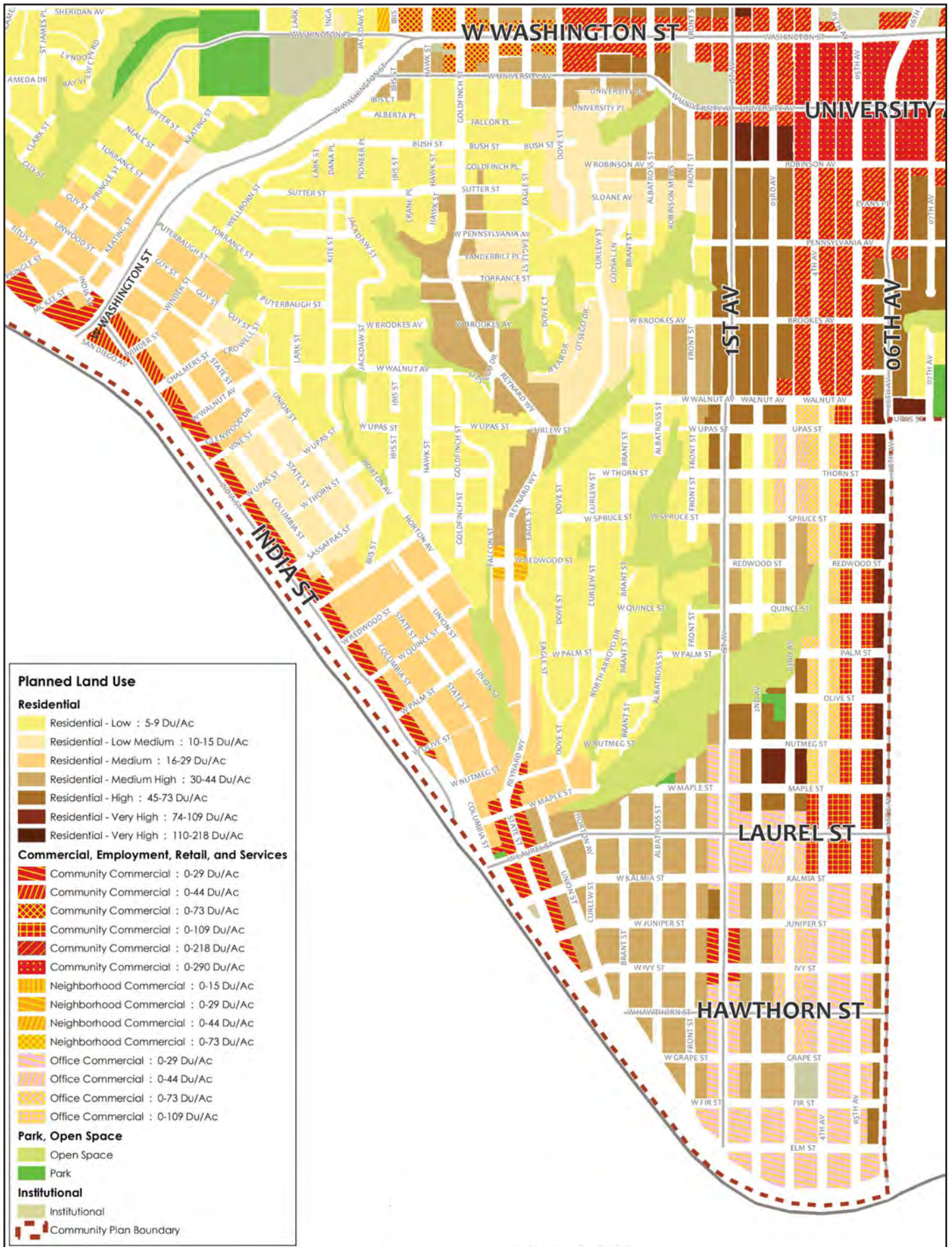


FIGURE 3-8b

Revised Uptown Community Plan Land Use Map - South





FIGURE 3-8c

Revised Uptown Community Plan Land Use Map - East



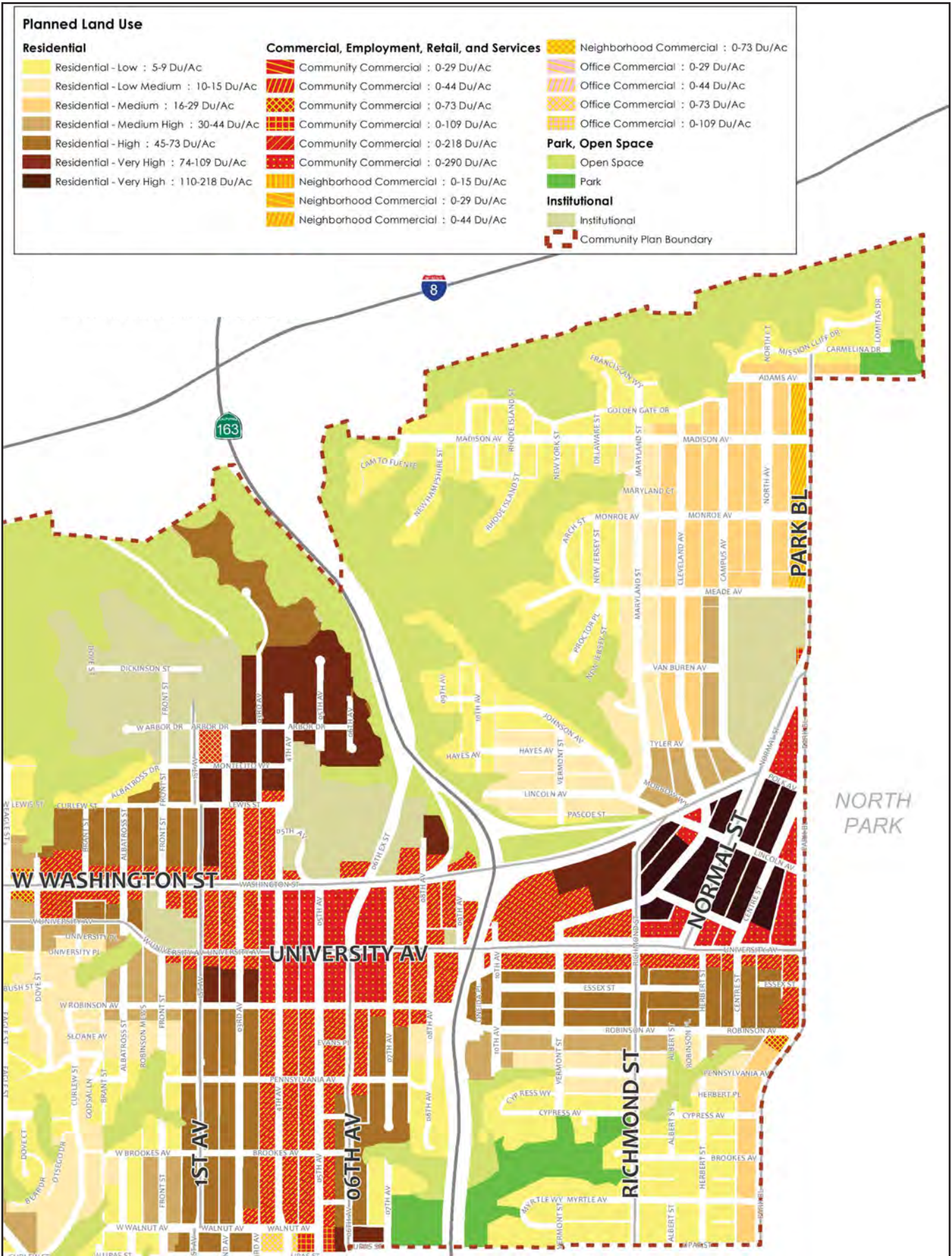


FIGURE 3-8c

Revised Uptown Community Plan Land Use Map - East

The Hillcrest FPA would add the Residential – Multiple Unit (RM)-4-11 base zone to the Hillcrest FPA area which will allow for 110-218 dwelling units per acre and a Floor Area Ratio (FAR) of 7.2. The Hillcrest FPA will also create two new base zones in the Uptown Community Plan to allow for higher residential density land uses and zone categories as follows (see Figure 3-9). These base zones will be associated with the Community Commercial (CC) (Residential Permitted) land use designation and will consist of:

- CC-3-10 zone - ~~32.0~~7.5 FAR, 0–218 dwelling units per acre
- CC-3-11 zone - ~~42.0~~8.0 FAR, 0–290 dwelling units per acre

The Land Use Chapter also provides definitions for Urban Villages and Neighborhood Villages and clarifies that certain policies relating to high intensity commercial, mixed-use development, and “active” commercial business uses apply to Urban Village areas.

### 3.5.2.2 Mobility

An amendment to the Uptown Community Plan Mobility chapter is proposed to reflect the City’s latest policy direction regarding mobility with a focus on reductions in per capita VMT in order to be consistent with the City’s CAP. Revisions include new text to support efficient use of curb space, increases in walking, cycling and public transit mode shares, and policy revisions to incorporate desired mobility features such as pedestrian promenades, wayfinding signage, bulb-outs, and traffic calming measures.

Specifically, the Hillcrest FPA supports consideration of traffic-calming measures such as raised intersections, corner bulb-outs, and roundabouts/traffic circles within the community. The following pedestrian corridors have been modified or included:

- University Avenue between First Avenue and Normal Street;
- Normal Street from University Avenue to Campus Avenue-/Polk Avenue;
- Robinson Avenue between Eighth Avenue and Park Boulevard; and
- Washington Street at the intersection of Eighth Avenue.

The Hillcrest FPA contains two new ~~policy~~policies (MO-1.17) to support coordination with the San Diego Unified School District on pedestrian improvements along Normal Street and potential right-of-way needs for intersection improvements at the El Cajon Boulevard, Normal Street, and Park Boulevard intersection, including but not limited to, a roundabout traffic control, new crossings, and a linear park and (MO-1.18) to encourage coordination with the California Department of Transportation Caltrans to improve connections along University and Robinson Avenue bridge overpasses for pedestrians and bicyclists





The Uptown Community Plan figures identifying revised pedestrian routes, existing and planned bicycle networks, and planned transit facilities are updated to reflect current conditions and updated planned mobility networks (Figures 3-10 through 3-12) and to reflect the City's latest policy direction. Policies have been amended to identify streets that should be improved with bicycle facilities and updates to planned transit based on the Regional Plan. Key changes related to planned transit include the following:

- Commuter rail from downtown San Diego to El Cajon via San Diego State University and La Mesa with a 10-minute all-day frequency, expected to be completed by 2050, contingent upon future funding.

Streetcar service will provide a 10-minute all-day frequency service from Downtown San Diego to the Hillcrest neighborhood and is planned to connect to Logan Heights, Golden Hill, South Park, North Park, and University Heights, expected to be complete by 2050, contingent upon future funding.

The Hillcrest FPA contains policies proposed to support further coordination with SANDAG and the Metropolitan Transit System on transit connections to Mission Valley and the UCSD La Jolla Campus (policy MO-3.13). A new policy (MO-3.14) is also proposed to identify strategies for implementing mobility hubs which can include public-private partnerships.

The Uptown Planned Street Classifications are depicted in Figure 3-13. Key changes to street classifications within the Hillcrest FPA area include identifying one-way roadway classifications along portions of University Avenue between First Avenue and Ninth Avenue and Robinson Avenue between First Avenue and Tenth Avenue. A new policy (MO-4.15) is also proposed to consider streetscape improvements along Evans Place and Harvey Milk Street to support a pedestrian friendly/shared street environment within a shared right-of-way.

### 3.5.2.3 Urban Design

Key changes to the Urban Design chapter of the Uptown Community Plan include new descriptions of promenades and public space design to be consistent with the Parks Master Plan. Promenades are linear public spaces arranged parallel to the public right-of-way that connect people through neighborhoods to services and transit. Promenades enhance pedestrian safety, provide space for non-traditional park opportunities, and encourage ground-floor activation.

Promenades are proposed as part of the Hillcrest FPA along University Avenue and Robinson Avenue. Implementation of promenades would occur incrementally as private development and investment in the area occurs. Linear promenade requirements for University Avenue and Robinson Avenue would be implemented through the proposed Community Plan Implementation Overlay Zone (CPIOZ) Type A – Hillcrest District, described in Section 3.5.2.11b. An additional promenade is planned along Normal Street as a new public space in Hillcrest between University Avenue and Washington Street as part of the existing Uptown Community Plan. This promenade would accommodate community events like the weekly Hillcrest Farmers Market and the San Diego Pride Festival and Parade and would be within the existing right-of-way.





FIGURE 3-10  
Uptown Existing and Planned Bicycle Network



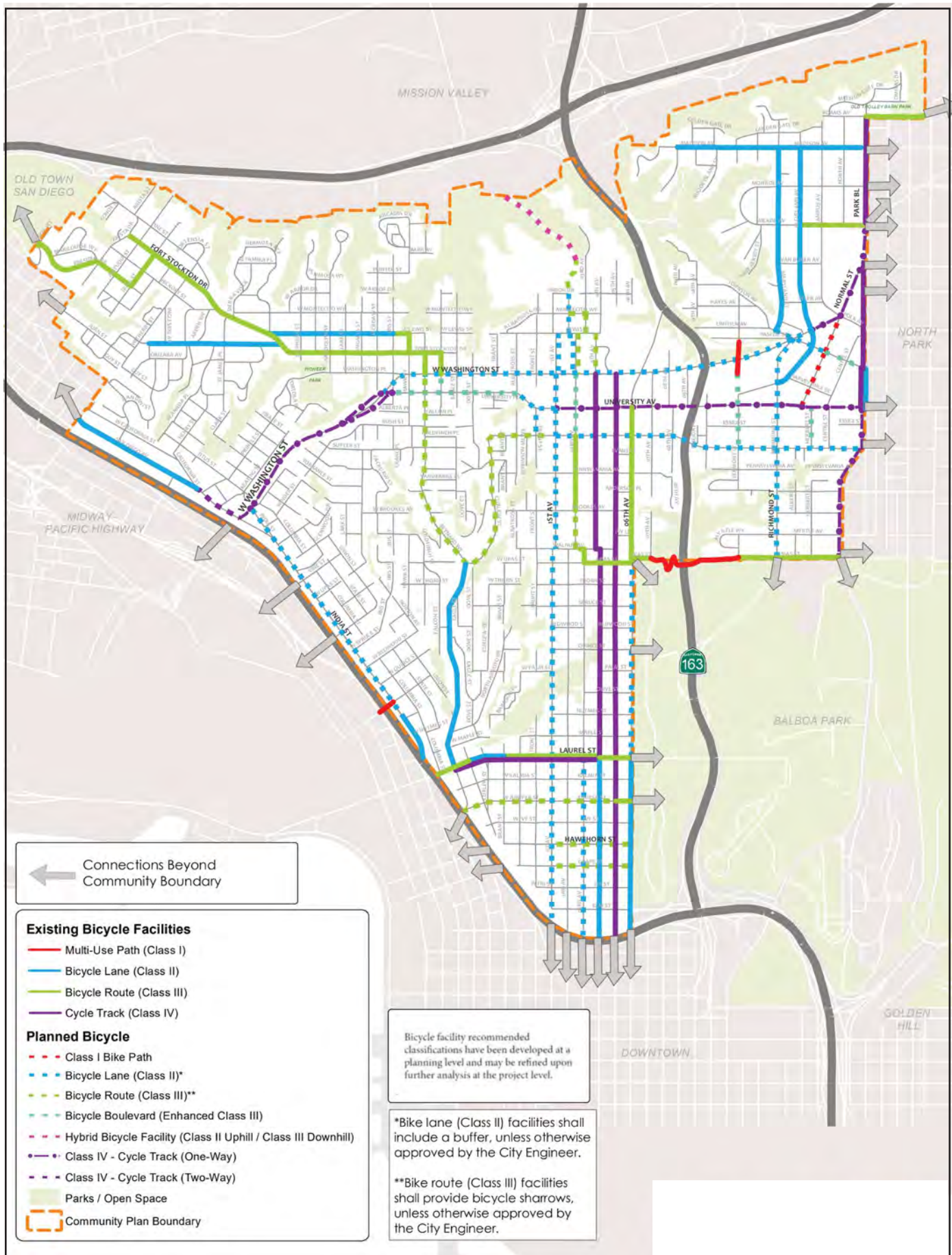


FIGURE 3-10  
Uptown Existing and Planned Bicycle Network



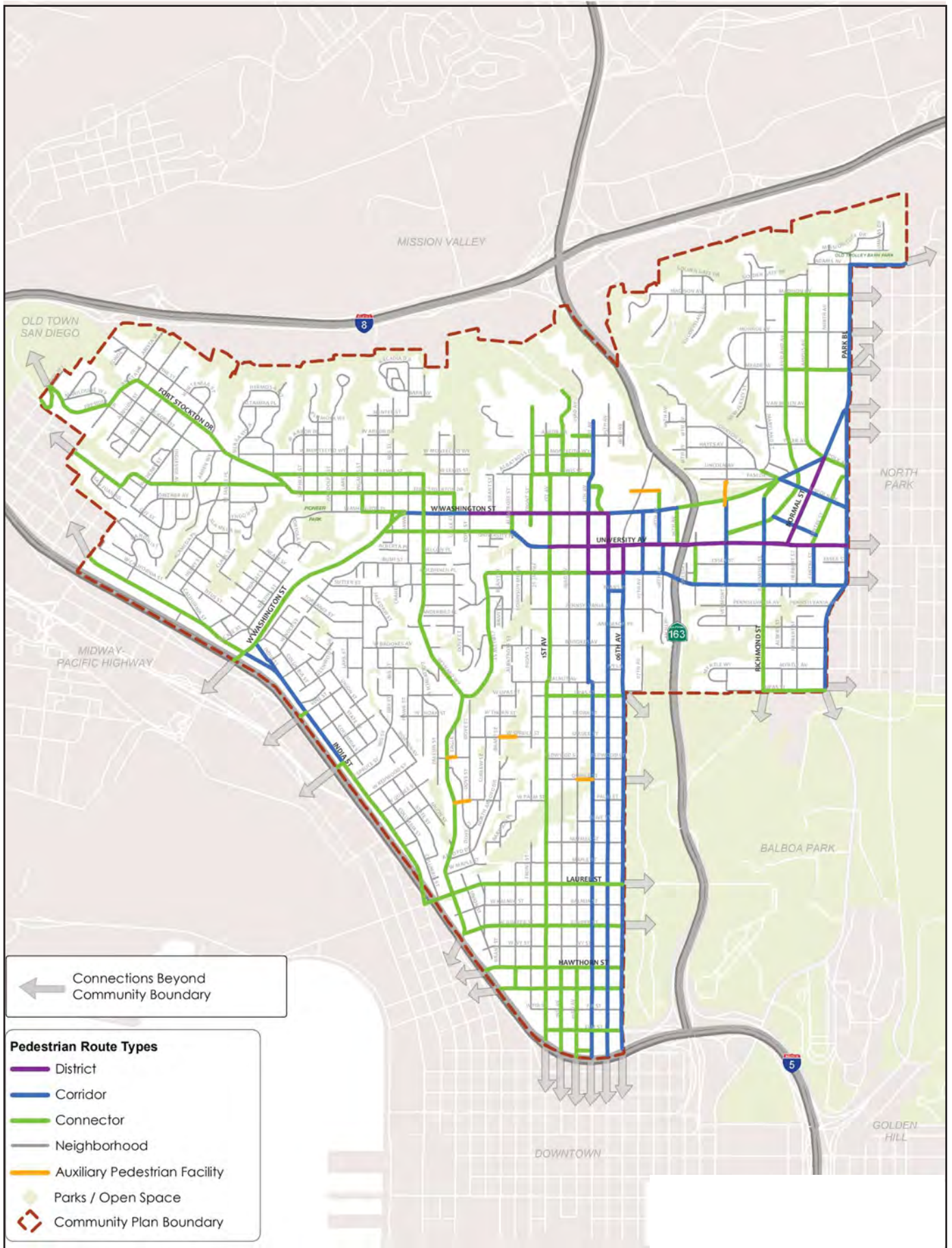


FIGURE 3-11  
Uptown Community Plan Pedestrian Routes



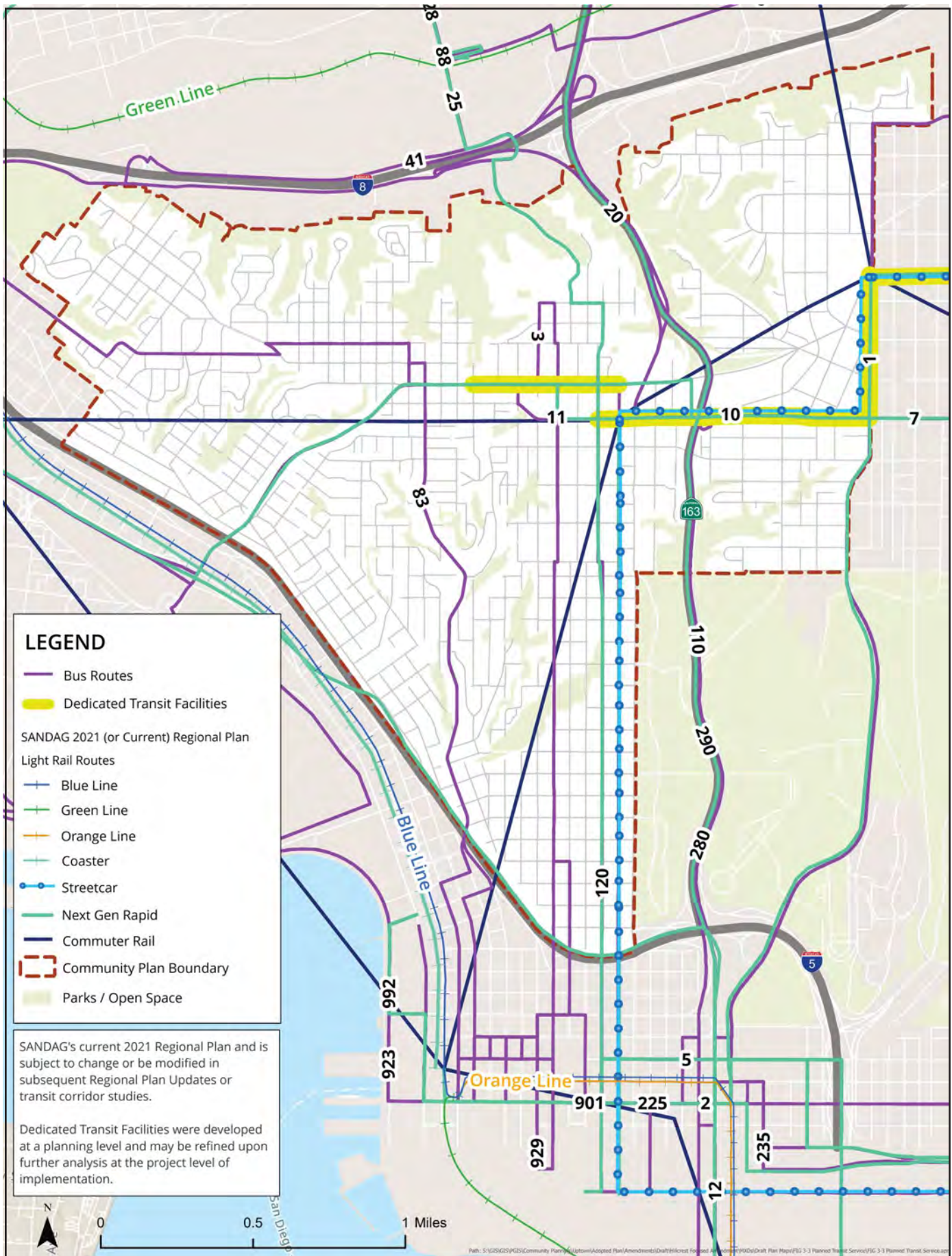


FIGURE 3-12  
Uptown Planned Transit Facilities



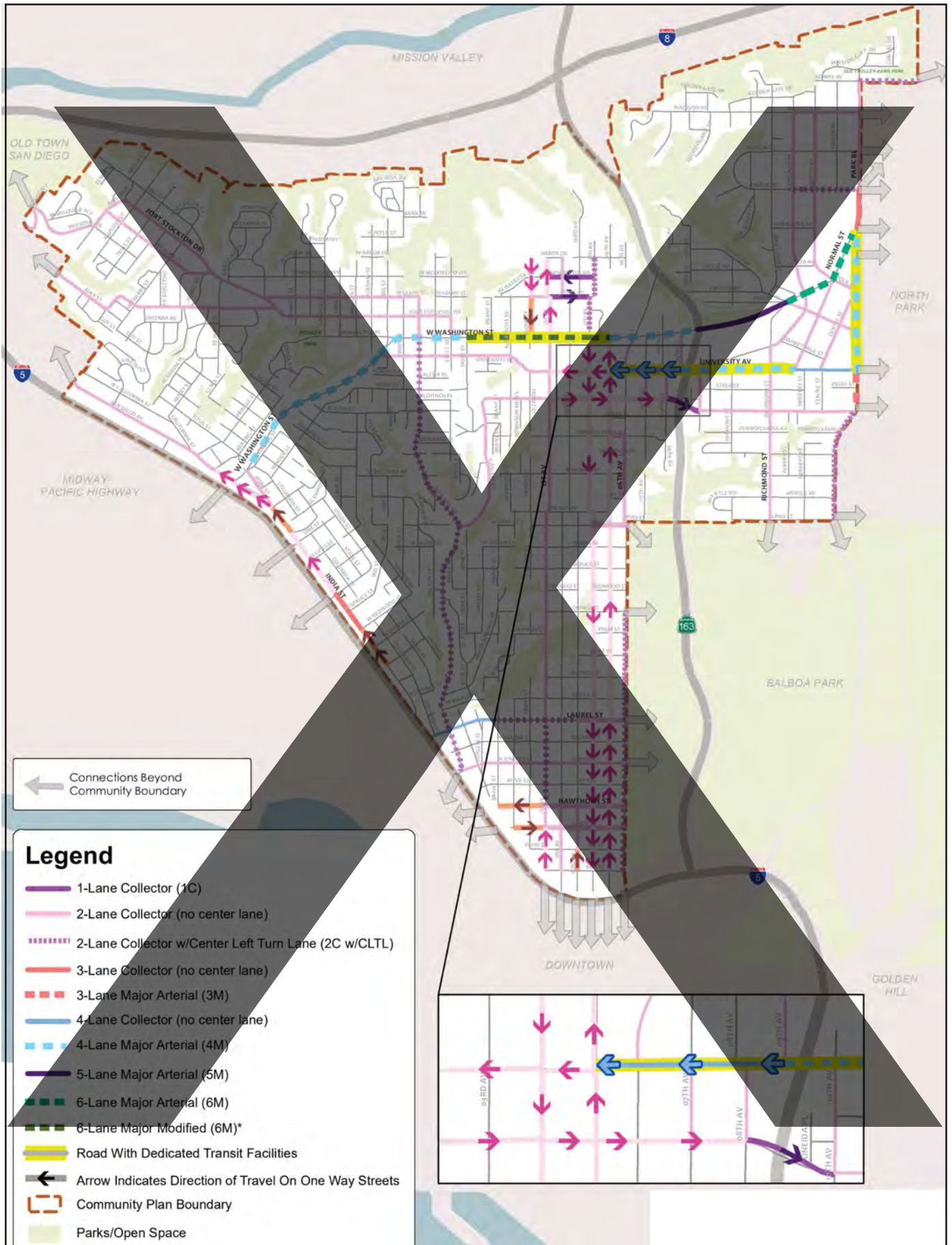


FIGURE 3-13  
Uptown Planned Street Classifications

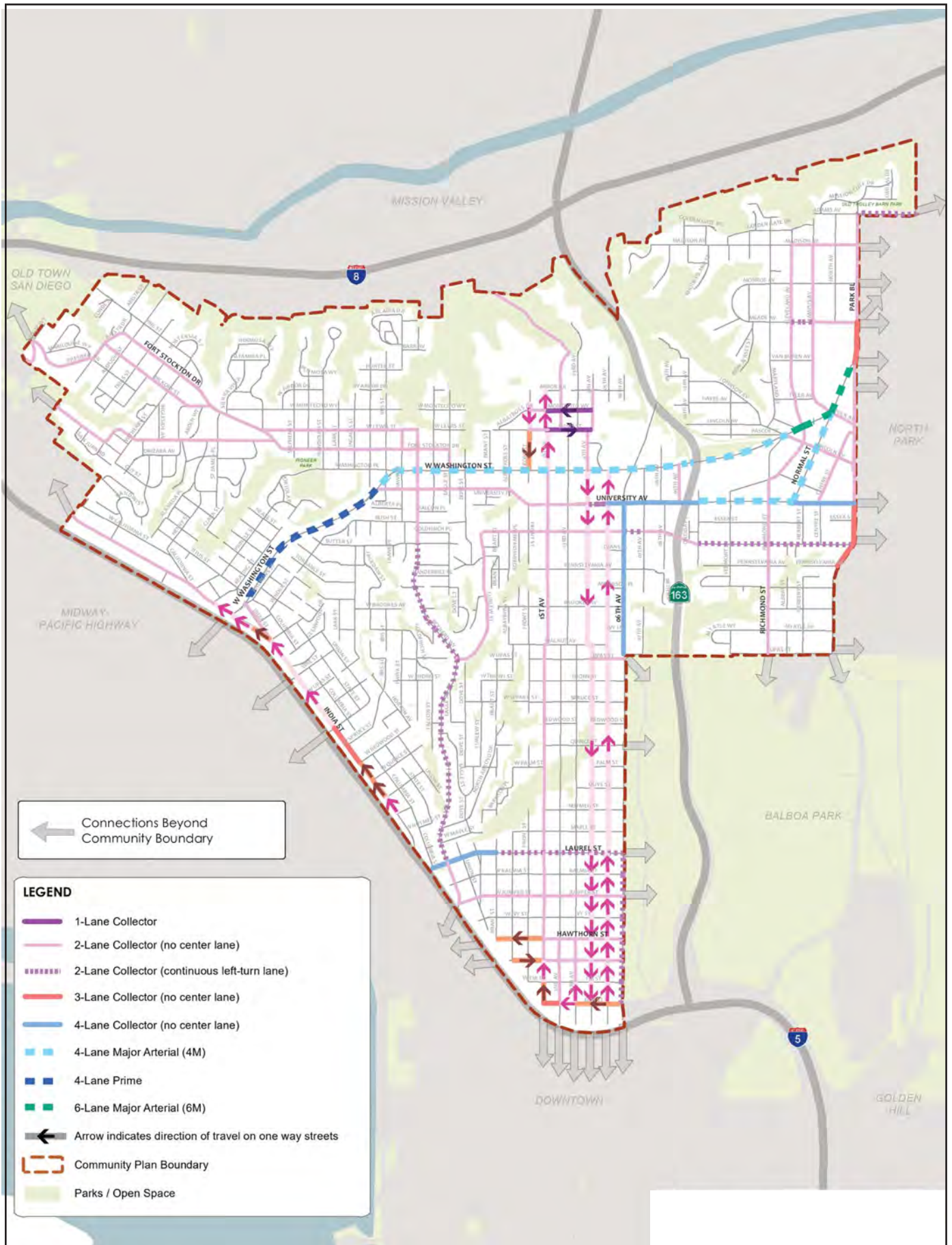


FIGURE 3-13  
Uptown Planned Street Classifications

A new section on public space design addresses methods to incorporate pedestrian features into public spaces. The Urban Design chapter includes amended policies and language to support the implementation of promenades and public spaces through the CPIOZ Supplemental Development Regulations (SDRs).

### **3.5.2.4 LGBTQ+ Cultural District**

The Hillcrest FPA would amend the Uptown Community Plan to include a new chapter addressing the LGBTQ+ Cultural District (Figure 3-14). A cultural district is an area of the City formally recognized for its people, history, events, and culture. Cultural districts can be recognized locally by City Council resolution and at the state level with certification from the California Arts Council. Key objectives of the LGBTQ+ Cultural District include the following:

- Commemorate, recognize, and highlight the people, spaces, buildings, events, and physical elements that contribute to the history and culture of the LGBTQ+ community in Hillcrest.
- Elevate the voices of under-represented and under-valued populations and organizations.
- Foster a spirit of pride and solidarity in our community in the face of new opportunities and challenges.
- Continue to offer welcoming safe spaces for the LGBTQ+ community to gather and express itself freely.
- Recognize Hillcrest as a center for community organization and LGBTQ+ activism in the past and currently as a place that continues to foster racial, ethnic, gender, and cultural diversity.
- Acknowledge the importance of entertainment and commercial business establishments and organizations in Hillcrest that welcome, serve, and represent the LGBTQ+ community and form a significant part of the LGBTQ+ culture and history.
- Present a collection of interpretive elements that communicate the intangible values associated with Hillcrest's history and culture.
- Feature a walking corridor consisting of conceptually connected "parklets" or other interpretive elements at key locations that are themed to recognize the locations' significance in LGBTQ+ life in Hillcrest.
- Feature personal quotes and stories from individuals in the LGBTQ+ and/or Hillcrest community.
- Provide policy guidance for the future implementation of public spaces and programming.



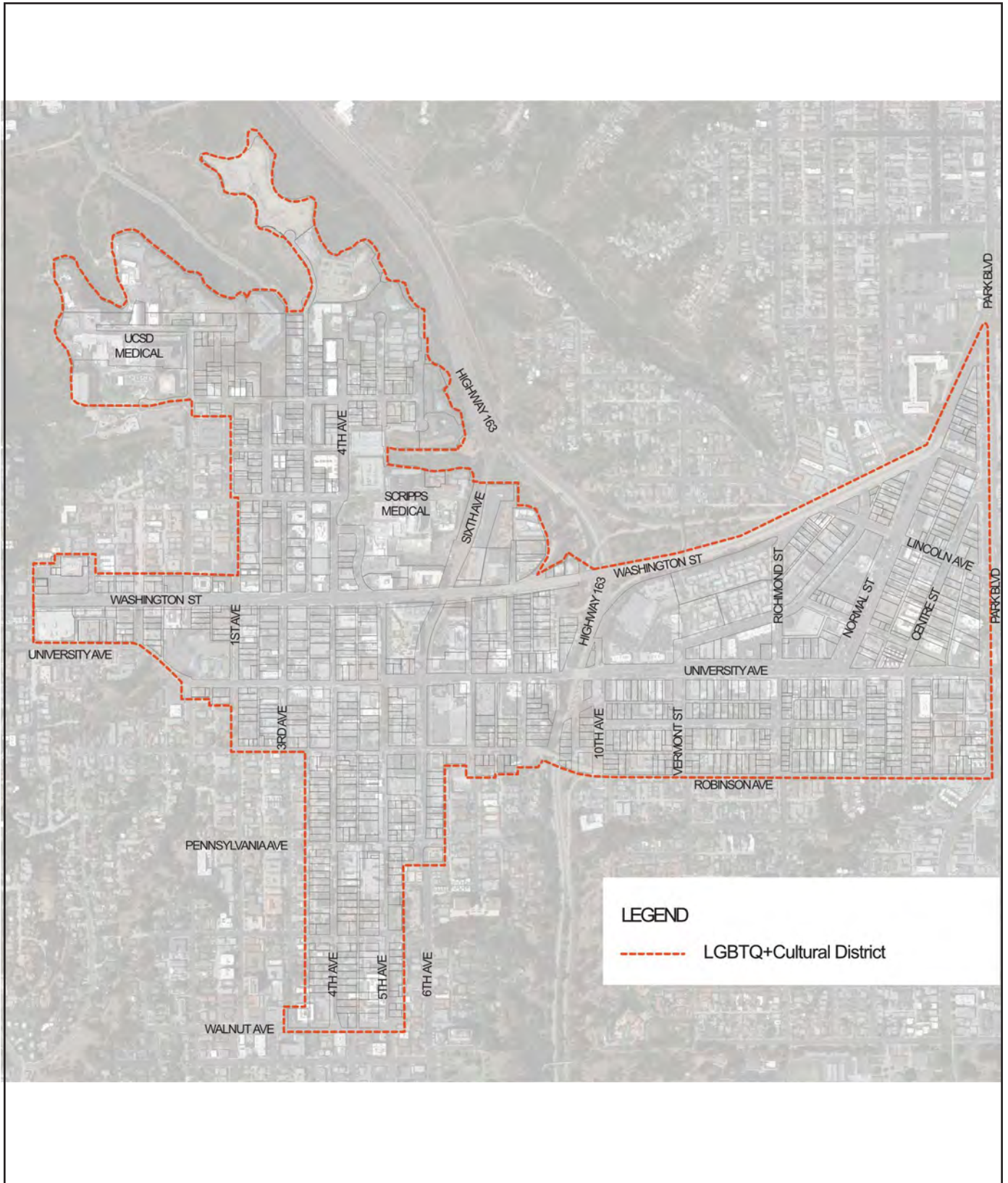


FIGURE 3-14  
Uptown LGBTQ Cultural District

In addition to the above objectives, the new chapter identifies how artwork, buildings, signage, and streetscape can be provided to support and reflect the cultural district. A number of policies are identified that would support the LGBTQ+ Cultural District including but not limited to exploring forming a variety of partnerships to strengthen the community, emphasizing stories of diversity; celebrating local artists; supporting protections for small and local businesses; exploring a potential LGBTQ+ Arts and Culture Campus including cultural organizations, hotel, LGBTQ+ businesses, and affordable housing on the California Department of Motor Vehicles site; and considering how signage, wayfinding, and lighting can be integrated into the interpretive elements of the walking corridor. Revisions to policies throughout the Uptown Community Plan are proposed to acknowledge and support protections for the LGBTQ+ Cultural District. Additionally, the Hillcrest FPA proposes a “Walking Corridor” to provide a focus for conceptually connected “parklets” or other interpretive elements at key locations, including essential business establishments and organizations that are themed to recognize the locations’ significance in LGBTQ+ life in Hillcrest.

### **3.5.2.5 Economic Prosperity**

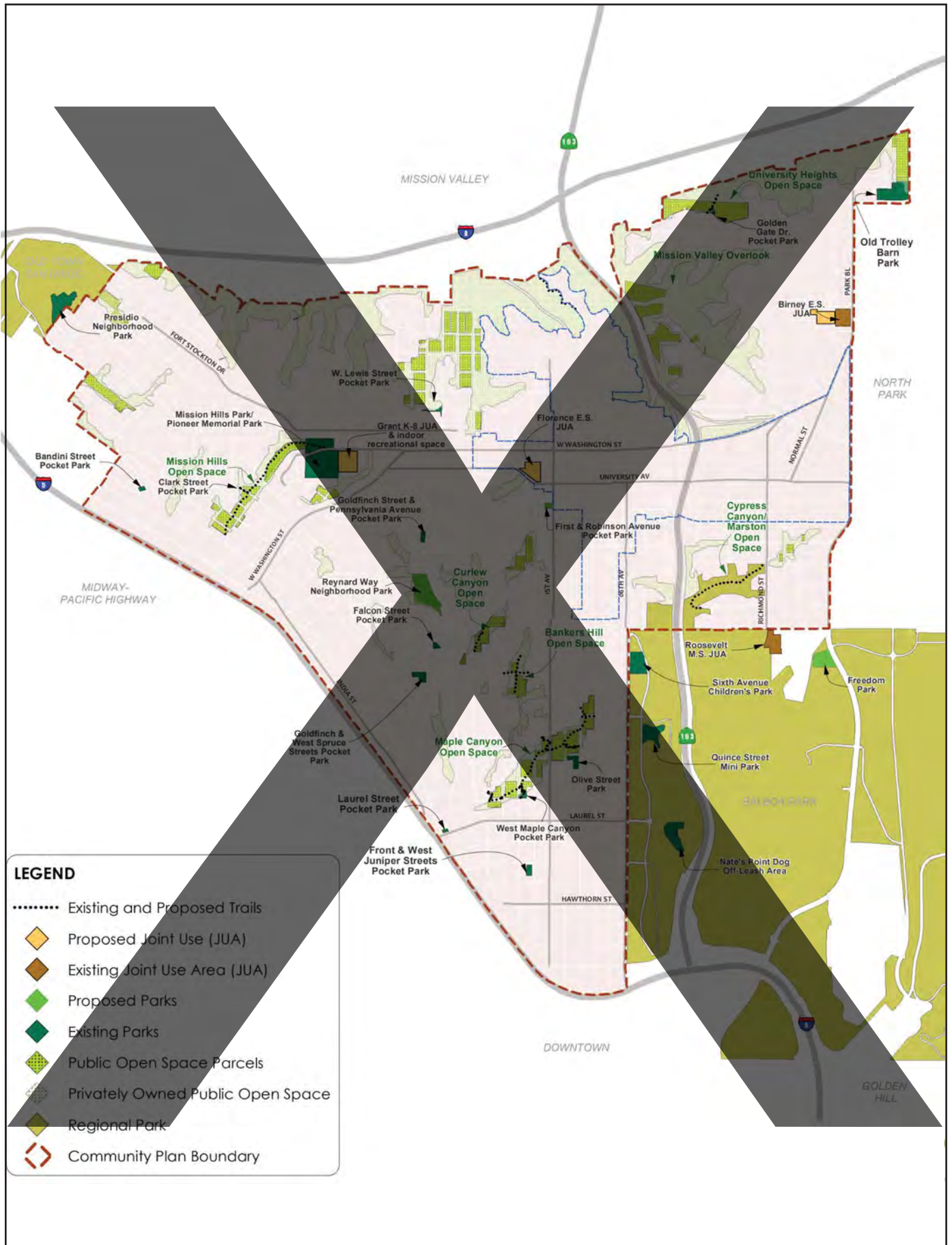
The Hillcrest FPA would amend the Uptown Community Plan Economic Prosperity chapter to reflect updated goals and policies recognizing and protecting Hillcrest’s unique role as a place for LGBTQ+ Cultural District. The updated element includes a new policy (EP-2.4) to support a certification or recognition program for places and events within the LGBTQ+ Cultural District that are tied to protections and incentives to strengthen establishments and minimize the potential loss of valued institutions. This element was also updated to include updates to employment and economic data within the Uptown area. Proposed business improvement districts and maintenance assessment districts are depicted in Figure 3-16.

### **3.5.2.6 Public Facilities, Services, and Safety**

The Uptown Community Plan Public Facilities, Services, and Safety chapter includes amendments to reflect updated City data related to services and facilities such as updated mapping reflecting the rebuilding of Fire Station 5, remodeling of Fire Station 3, and the recently expanded Fire Station 8 and the new Mission Hills Branch library. The text of the element was updated to reflect the latest City goals and policies to reflect mobility and infrastructure goals of the CAP and updated approaches to funding facilities consistent with Build Better SD that prioritizes infrastructure in areas with the greatest needs and growth.

### **3.5.2.7 Recreation**

The Hillcrest FPA would amend the Uptown Community Plan Recreation chapter to incorporate updates based on the latest park data, updates to reflect adoption of the Parks Master Plan, and updated standards for park and recreation facilities. Within the Hillcrest FPA, one new pocket park is proposed at Ninth Avenue and University Avenue (Figure 3-15).

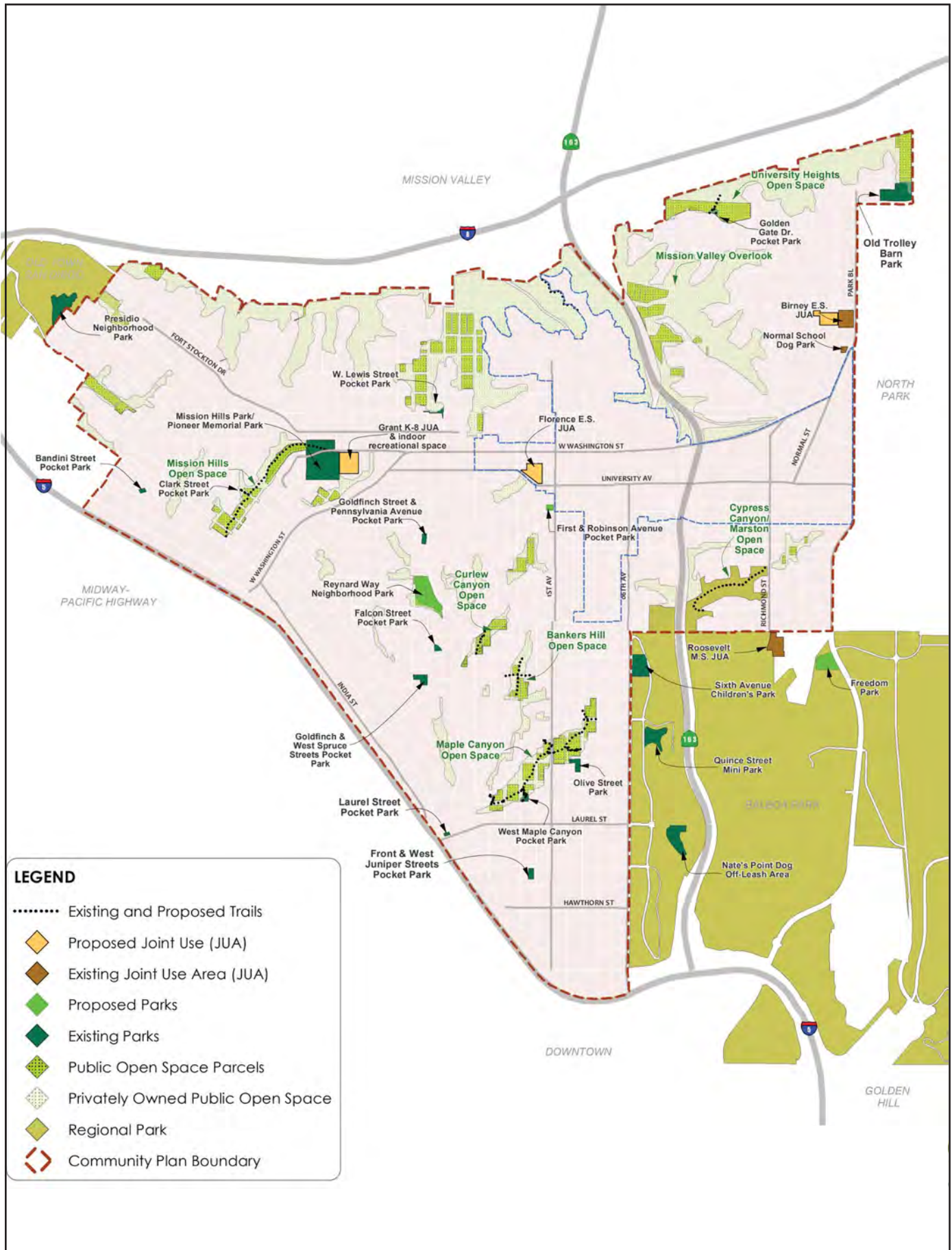


**LEGEND**

- Existing and Proposed Trails
- ◆ Proposed Joint Use (JUA)
- ◆ Existing Joint Use Area (JUA)
- ◆ Proposed Parks
- ◆ Existing Parks
- ◆ Public Open Space Parcels
- ◆ Privately Owned Public Open Space
- ◆ Regional Park
- Community Plan Boundary

**FIGURE 3-15**  
Uptown Parks, Recreation Facilities and Open Space





**LEGEND**

- ..... Existing and Proposed Trails
- ◊ Proposed Joint Use (JUA)
- ◊ Existing Joint Use Area (JUA)
- ◊ Proposed Parks
- ◊ Existing Parks
- ◊ Public Open Space Parcels
- ◊ Privately Owned Public Open Space
- ◊ Regional Park
- ◊ Community Plan Boundary

**FIGURE 3-15**  
Uptown Parks, Recreation Facilities and Open Space



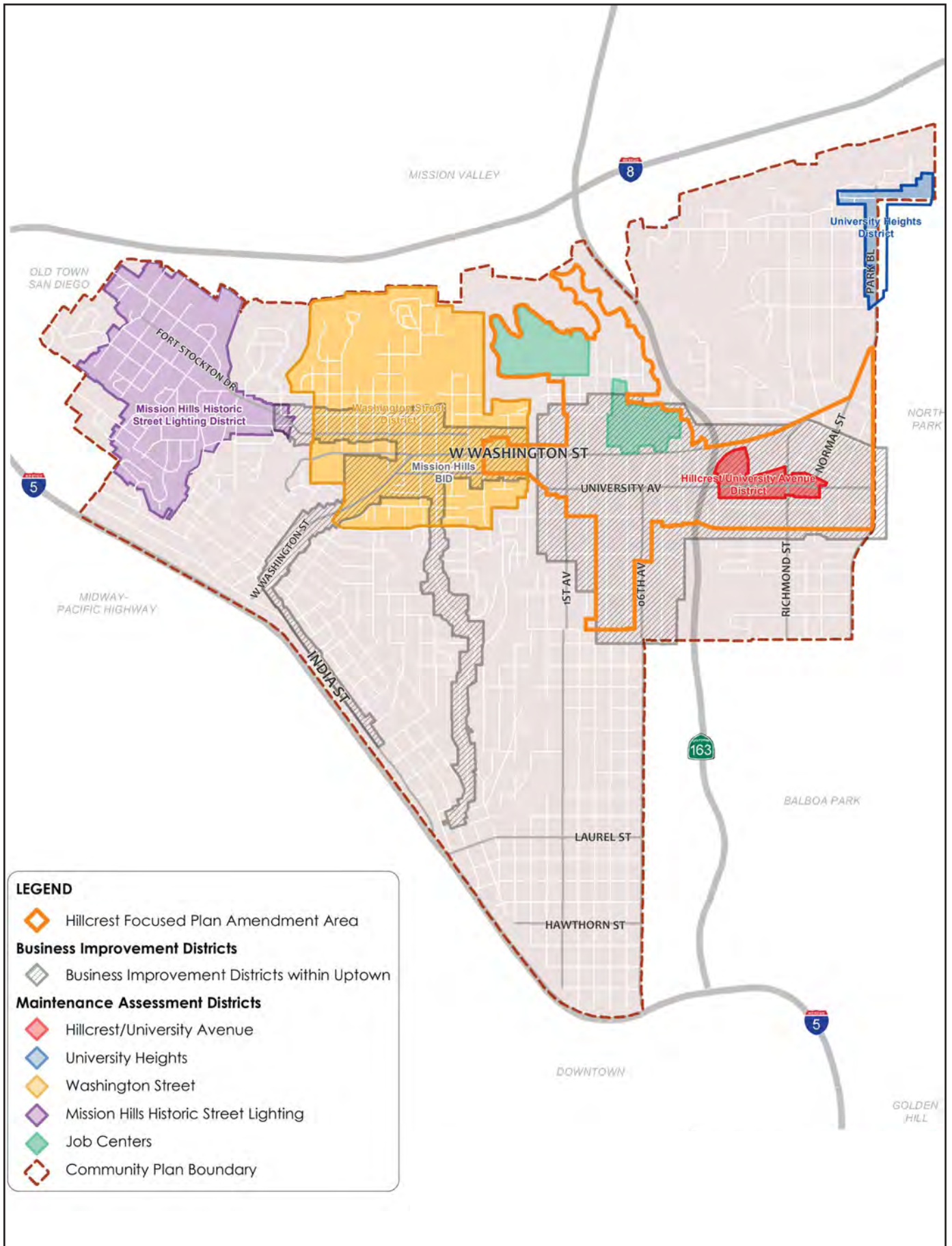


FIGURE 3-16

Uptown Economic Revitalization Areas

### 3.5.2.8 Conservation

The Hillcrest FPA would amend the Uptown Community Plan Conservation chapter to reflect updates to the City's 2022 CAP regarding the six strategies of the CAP and would update references to policies in the General Plan Conservation Element. Refer to Table 9-1: General Plan Related Conservation Topics and Policies of the Hillcrest FPA for a complete list of how the Uptown Community Plan policies relate to the revised General Plan Conservation Element Sections. The Hillcrest FPA would amend the Uptown Community Plan Conservation chapter to amend existing policy CE-1.12 supporting implementation of the CAP to include a new action that would encourage the installation of improvements to reduce traffic congestion and improve air quality, such as roundabouts.

### 3.5.2.9 Noise

The Hillcrest FPA would amend the Uptown Community Plan Noise chapter to add a new policy (NE-1.5) which encourages the upfront disclosure of noise levels in mixed-use and residential developments near commercial/entertainment areas during property sales or lease agreements. Policy NE-1.22 would also be amended to clarify that the establishment of a "buffer zone" between the location of special events and Sixth Avenue should be considered with the exception of the Pride festival and parade. Refer to Section 3.5.2.11.d CPIOZ Type A – Commercial Activity Area for a discussion of the Commercial Activity Area and required notifications related to noise.

### 3.5.2.10 Historic Preservation

The Hillcrest FPA would amend the Uptown Community Plan Historic Preservation chapter to incorporate the latest data regarding the number of designated historical resources and the number of potential historic districts within the Uptown Community Plan area. Tables and figures illustrating the text within the Historic Preservation chapter were also updated and included in a new Appendix E to the Uptown Community Plan. Refer to Section 3.5.2.11.c CPIOZ Type A - Hillcrest Historic District for details about implementation of a potential Hillcrest Historic District.

### 3.5.2.11 Implementation

A new section regarding CPIOZ (SDMC Chapter 13, Article 2, Division 14) implementation is provided in the Uptown Community Plan Implementation chapter. The Hillcrest FPA would amend the existing CPIOZ Type A – Building Heights and would create three new CPIOZ Type A areas: the Hillcrest District, Hillcrest Historic District, and Commercial and Entertainment Activity Area. As indicated in SDMC Table 132-14B, any development within the boundaries of a CPIOZ Type A where the proposed development complies with the Supplemental Development Regulations (SDRs) can be processed ministerially, otherwise a Process Three Site Development Permit is required.

#### a. CPIOZ Type A – Building Heights

The Hillcrest FPA would amend the existing CPIOZ Type A – Building Heights in the Uptown Community Plan. The 30-foot height limit in University Heights and 50-foot height limit in Mission

Hills will remain, and the 65-foot height limit in Banker's Hill/Park West would apply to a reduced area outside of the FPA area. The current height limit of 65-feet within the FPA area would be removed and a new height limit of 100-feet would be applied coterminous with the boundary of the Hillcrest Historic District. Figure 3-17 illustrates the CPIOZ areas subject to height limits. Buildings within the University Heights, Mission Hills, and Bankers Hill/Park West CPIOZ boundaries would be subject to SDR-A.1, which states that buildings that exceed the height limitations set forth in Table 3-3 may be approved to the maximum allowed height of the applicable base zone, or the maximum allowed floor area of the base zone for zones without a maximum height limit with a Site Development Permit per Chapter 13, Article 2, Division 14 of the SDMC if they comply with the applicable regulations of the SDMC and are consistent with the applicable policies in the General Plan and Uptown Community Plan. Within these areas ministerial approval would be granted for proposed development projects with buildings or structures that do not exceed the height limitations set forth in Table 3-3. Building heights and setbacks within the proposed CPIOZ-Type A-Hillcrest Historic District would be subject to SDR-C.3 and SDR-C.4.

Location	Height Limit
University Heights	30 Feet
Mission Hills	50 Feet
Bankers Hill/Park West	65 Feet
Hillcrest Historic District	100 Feet

## **b. CPIOZ Type A – Hillcrest District**

The Hillcrest FPA would create a new CPIOZ Type A area, the Hillcrest District (see Figure 3-17). Within the CPIOZ Type A – Hillcrest District area, ministerial approval would be granted for developments that comply with SDR-B.1 through SDR-B.4 which identify when a project is required to provide a Public Space, a Promenade, or an LGBTQ+ Interpretive Trail improvement, as well as the requirements associated with each improvement. Planned promenades with the Hillcrest District are identified in Figure 3-18. These SDRs supplement the base zone regulations in the SDMC Chapter 13, the Landscape Regulations in SDMC Chapter 14, Article 2, Division 4, the CAP Consistency Regulations in SDMC Chapter 14, Article 3, Division 14, and the City's Street Design Manual. Landscape and public right-of-way improvements required as part of these SDRs may also satisfy applicable SDMC requirements. Additionally, the CPIOZ Type A – Hillcrest District includes SDR-B.5, which applies to all new development within the CPIOZ Type A – Hillcrest District boundaries and which provides requirements related to building facade design.

The Hillcrest Historic District CPIOZ and the Commercial and Entertainment Activity Area CPIOZ (see Figure 3-17) are within the Hillcrest District CPIOZ. The Hillcrest Historic District CPIOZ and the Commercial and Entertainment Activity Area CPIOZ have their own distinct SDRs and are also subject to the districtwide SDRs applicable to the CPIOZ Type A – Hillcrest District.



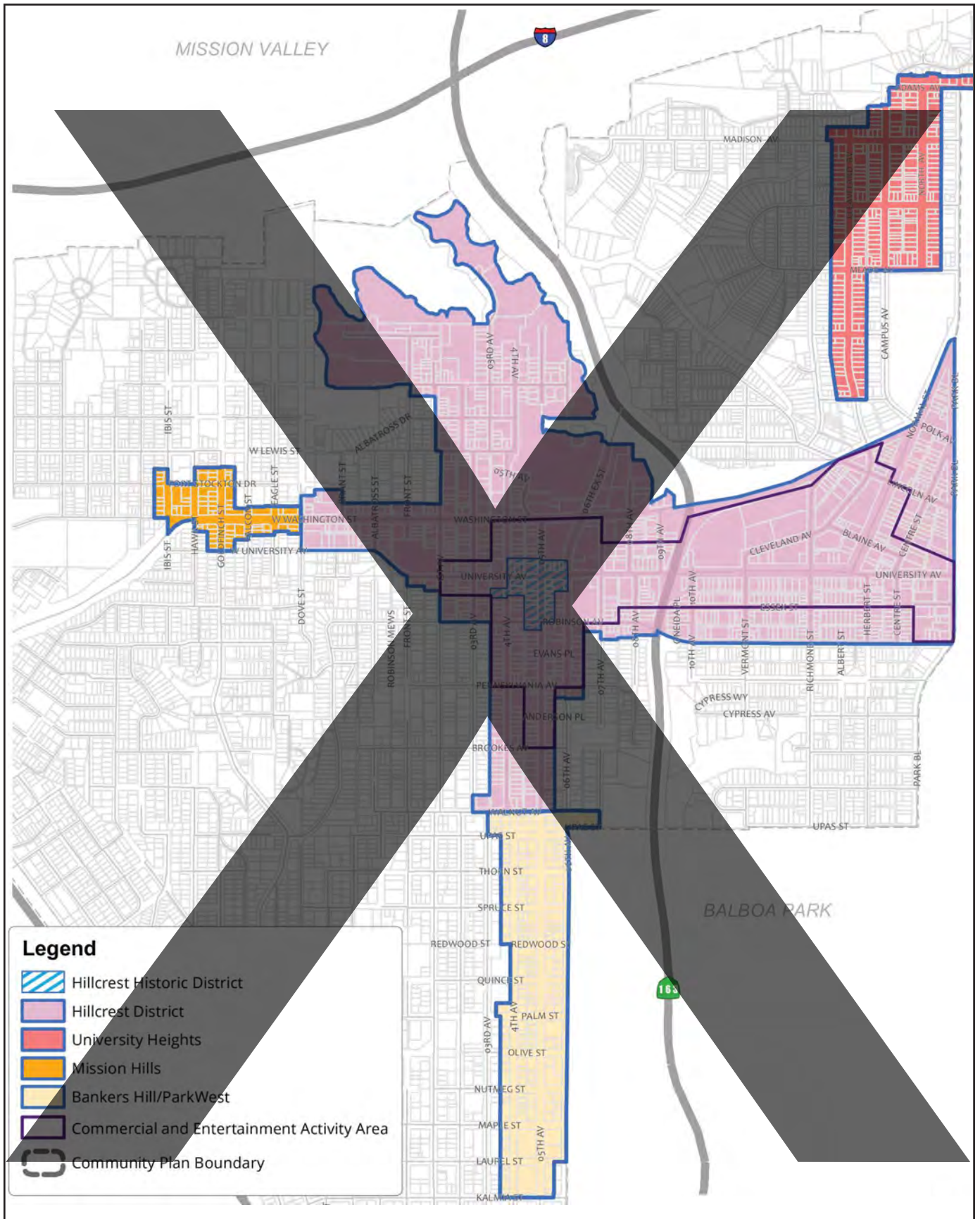


FIGURE 3-17  
Uptown Community Plan Implementation  
Overlay Zone - Type A

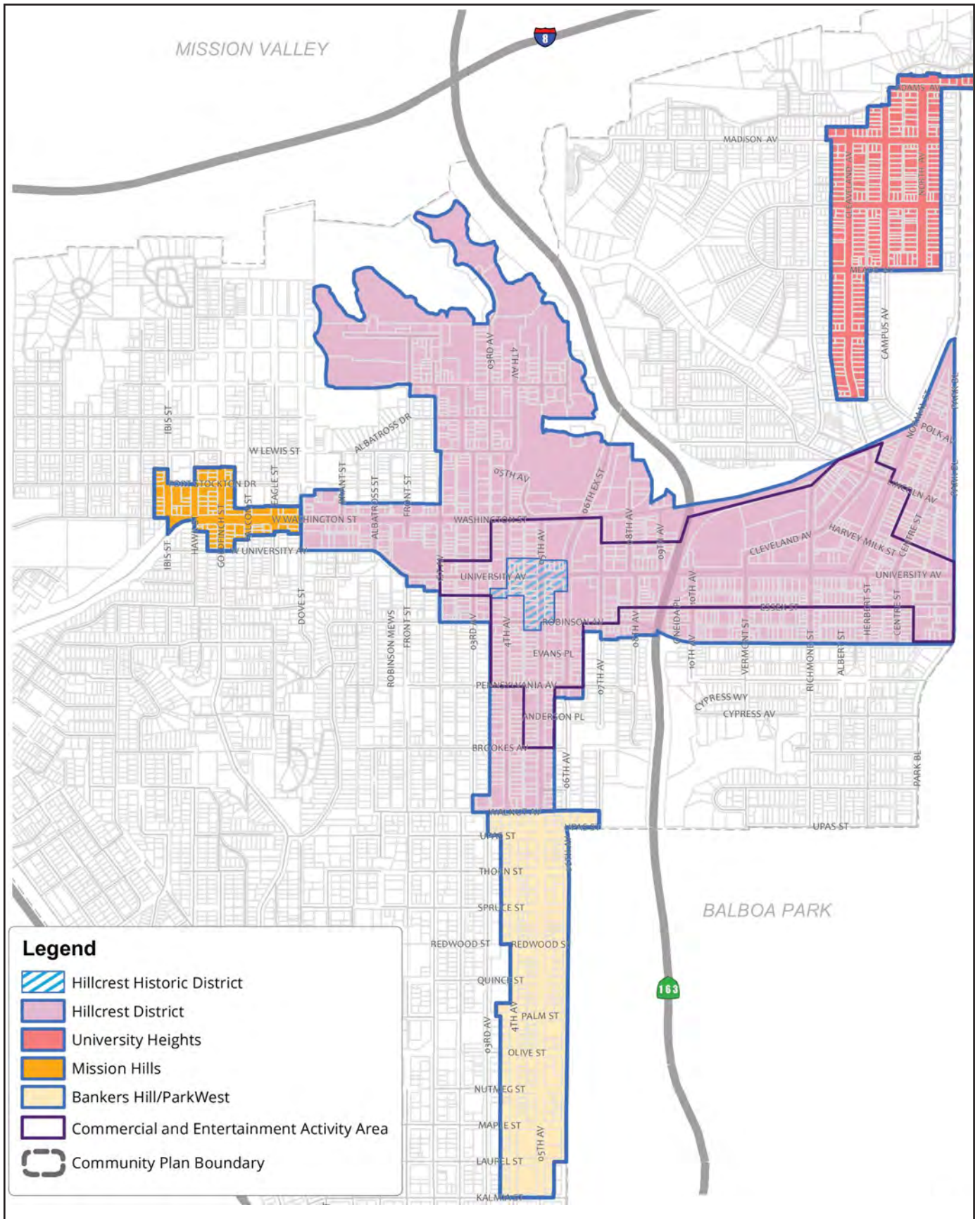


FIGURE 3-17  
Uptown Community Plan Implementation  
Overlay Zone - Type A



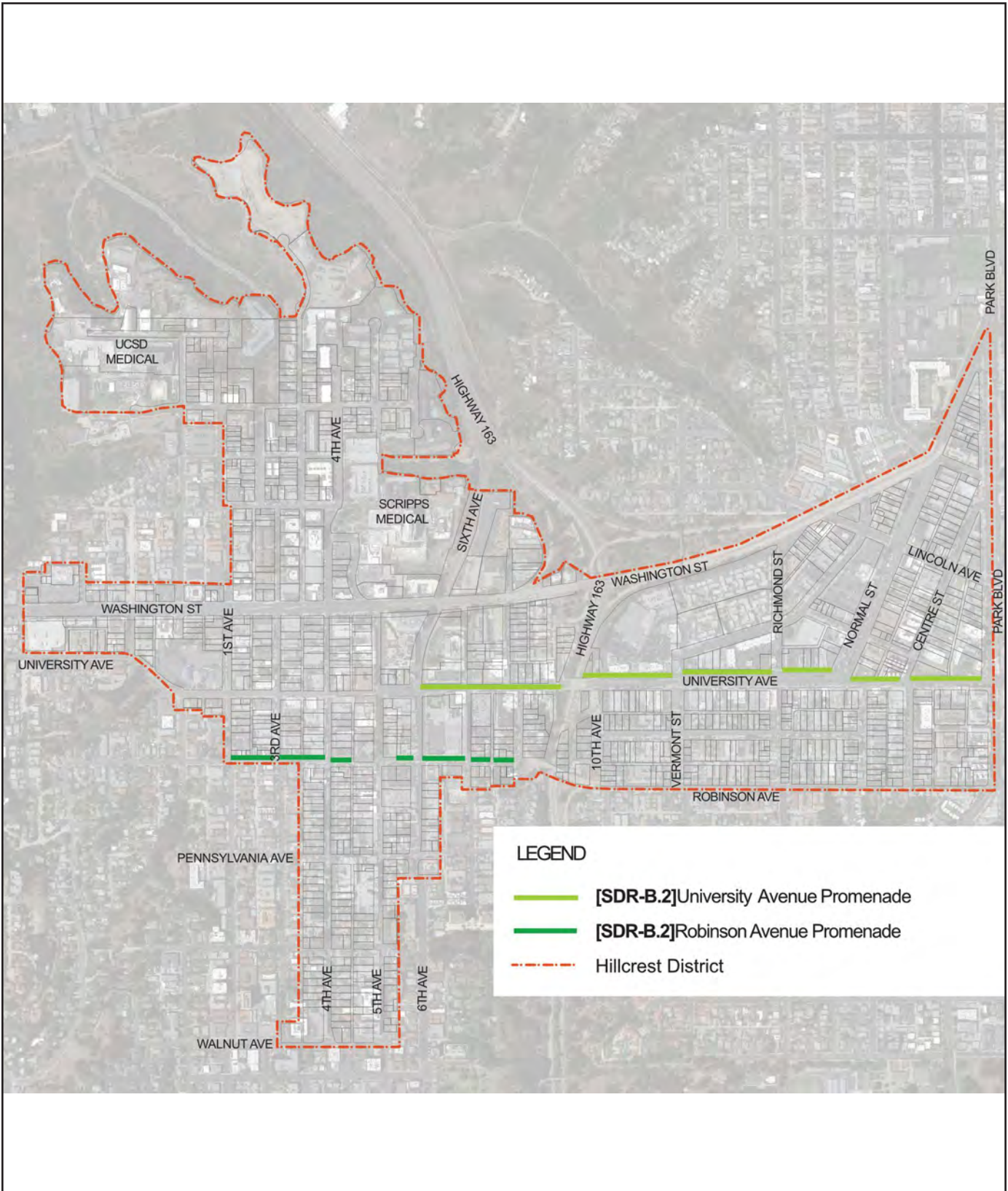


FIGURE 3-18  
Hillcrest District Promenades

### c. ~~CPIOZ Type A~~ - Hillcrest Historic District

As part of the Hillcrest FPA, a new ~~CPIOZ Type A~~ – Hillcrest Historic District, is proposed within the Hillcrest FPA area. The proposed ~~CPIOZ Type A~~ includes SDRs which supplement the City's Historical Resources Regulations and will only apply to development within the proposed Hillcrest Historic District. The City has begun processing of the Hillcrest Historic District, which involves meetings with the property owners and tenants as well as hearings before the Historical Resources Board and its Policy Subcommittee. The designation process is scheduled to conclude shortly after the scheduled adoption of the Hillcrest FPA. The district, which is commercial in nature, was developed at zero-foot front and side yard setbacks, resulting in a development pattern of storefronts set up against the sidewalk and unornamented utilitarian side and rear walls. As a result, character defining features are primarily limited to the front facade. The SDRs are designed to protect the significant historic character defining features – namely the storefronts and the 1-3 story pedestrian scale along the streetscape – while allowing for new development within the district. The proposed SDRs provide design regulations for contributing and non-contributing resources as identified in the Hillcrest Historic District nomination and by the HRB when designated (SDRs-C.1 and C.2), building heights within the CPIOZ area (SDR-C.3), and building stepbacks (SDR-C.4). Future development within the ~~CPIOZ Type A~~– Hillcrest Historic District would be required to comply with the SDRs identified in the CPIOZ. Development that complies with these SDRs may be considered a minor alteration under the City's Historical Resources Regulations, and therefore meet the exemption criteria from a Site Development Permit.

### d ~~CPIOZ Type A~~ - Commercial and Entertainment Activity Area

The ~~CPIOZ Type A~~ – Commercial and Entertainment Activity Area (see Figure 3-17) includes SDRs which supplement the sidewalk cafes, streetaries, outdoor patio, and active sidewalks regulations in SDMC Chapter 14, Article 1, Division 6. These SDRs only apply to properties within the ~~CPIOZ Type A~~ – Commercial and Entertainment Activity Area. The purpose of these SDRs is for new development to provide noticing to prospective buyers and renters within the CPIOZ boundaries regarding noise associated with eating and drinking establishments, while allowing for those uses to operate within or abutting a development with residential uses.

The CPIOZ contains SDR D.1, which would limit the hours of operation for establishments within the Commercial and Entertainment Activity Area CPIOZ boundary, and would also prohibit a sidewalk cafe, streetary, outdoor patio, or active sidewalk in an alley abutting a residential development. The CPIOZ also includes SDR--D.2 which would require new residential development within the Commercial and Entertainment Activity Area to prominently display a Commercial and Entertainment Activity Area Disclosure-Notice in any onsite rental or sales offices and provide this notice to prospective buyers or renters of a residential dwelling unit prior to entering into an agreement to purchase or rent the dwelling unit.

The ~~CPIOZ Type A~~ – Commercial and Entertainment Activity Area also includes SDR-D.3 which applies to Legacy Commercial Retail Sales Establishments, which are defined as an establishment located within the Commercial and Entertainment Activity Area that have operated at the same location for 30 years or more and have not had any interruption in operations for more than two years. SDR-D.3 provides regulations regarding the demolition of Legacy Commercial Establishments and the leasing

of the subsequent replacement space and requires that a development proposing the demolition of a building with a Legacy Commercial Retail Sales Establishment shall provide notice of intent to demolish the establishment 9 months prior to the start of demolition and shall allow the Legacy Commercial Retail Sales Establishment to occupy the space until 6 months prior to the start of demolition. Development shall provide first right of first refusal to the Legacy Commercial Retail Sales Establishment to lease a comparable tenant space in the development at a cost per leasable square footage equal or less than the existing tenant space with a 10-year term.

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

The University CPU is a comprehensive update to the existing University Community Plan. The University CPU establishes an updated vision and objectives that aligns with the General Plan policies, including those proposed and amended by the Blueprint SD Initiative and City of Villages Strategy, as well as recently adopted policy direction from the CAP, Parks Master Plan, and Climate Resilient SD. The University CPU also takes into consideration the Regional Plan. The University CPU updates the land use plan for the CPU area to help achieve the desired vision and objectives for the community. The University CPU identifies several guiding principles, plan goals and policies, and identifies procedures for plan implementation, as well.

University CPU guiding principles include the following:

- **Renowned Institutions** – The development of institutions that provide world leading research, higher education, and healthcare which contribute to the built environment and support the economic growth and attractiveness of the community.
- **A Vibrant Mixed-Use Urban Core** – A land use pattern that focuses growth into a vibrant urban core which contains regional transit connections and a distinct range of uses, character, streetscapes, places, urban form, and building design as a leader in sustainability.
- **A Diversified Housing Inventory** – A housing inventory that contains a broad range of housing types and costs to accommodate a variety of age groups, household sizes and compositions, tenure patterns, and income levels.
- **A Center of Economic Activity** – An employment center with scientific research, technology and office uses that provide jobs in proximity to residential, retail, and visitor-serving uses connected by transit that supports the economic viability and attractiveness of the community.
- **A Complete Mobility System** – A mobility system that provides multi-modal options and a complete network for travel within the community and connectivity to the region, enhancing economic growth, livability, and sustainability.
- **A Sustainable Community Integrated with its Natural Environment, Open Space, and Recreational Areas** – Preservation of open space, watershed protection and improvement, restoration of habitat, enhancement of species diversity, improvement of population-based parks and recreation areas, and provision of connections for wildlife and people, contribute to community character, enhance quality of life, and preserve unique natural resources.



The changes proposed to the University CPU land use plan address the demand for homes and jobs and reflect the recent extension of the UC San Diego Metropolitan Transit System Blue Line Trolley service to UCSD and other existing and planned transit services.

Table 3-4 identifies the existing, adopted plan and proposed plan non-residential build-out square footage for the University CPU area. Compared to the adopted University Community Plan, the University CPU would result in an overall community-wide increase of approximately 36,800,000 square feet of planned non-residential floor area. Compared to the existing amount of non-residential square footage, the University CPU would result in an overall increase of approximately 40,582,000 square feet of planned non-residential floor area.

Table 3-5 identifies the total number of existing homes by type and the total number of homes that could be built for the adopted University Community Plan and proposed University CPU. Compared to the adopted University Community Plan, the University CPU would result in an overall community-wide increase of approximately 29,000 additional planned residential units. Compared to the existing amount of residential units, the University CPU would result in an overall increase of approximately 30,480 additional residential units.

<b>Table 3-4 Existing, Adopted, and Proposed University Community Plan Non-Residential Floor Area (square feet)</b>					
<b>Land Use Category</b>	<b>Existing Floor Area (2020)</b>	<b>Adopted Plan Floor Area</b>	<b>Proposed CPU Floor Area</b>	<b>Change from Existing (2020)</b>	<b>Change from Adopted Plan</b>
Education	633,000	633,000	633,000	0	0
Industrial Park/Research and Development	10,600,000	14,050,000	27,243,000	16,643,000	13,193,000
Institutional	602,000	602,000	602,000	0	0
Institutional-Higher Education	27,800,000	27,800,000	27,800,000	0	0
Institutional-Medical	2,730,000	2,730,000	2,730,000	0	0
Light Industry/Warehouse	2,091,000	2,929,000	797,000	-1,294,000	-2,132,000
Office Commercial	11,405,000	10,361,000	29,462,000	18,057,000	19,101,000
Recreation	108,000	108,000	108,000	0	0
Retail Commercial	1,721,000	2,259,000	7,957,000	6,236,000	5,698,000
Visitor Commercial	1,595,000	1,595,000	2,535,000	940,000	940,000
<b>Grand Total</b>	<b>59,285,000</b>	<b>63,067,000</b>	<b>99,867,000</b>	<b>40,582,000</b>	<b>36,800,000</b>
CPU = Community Plan Update Source: City of San Diego 2020 Note: Existing square feet are from the November 2020 University Community Plan Update Adopted Plan Buildout Report.					

<b>Table 3-5 Residential Buildout – Adopted and Proposed Community Plan</b>					
Land Use Category	Existing Units	Adopted Plan Units	Proposed CPU Units	Change from Existing	Change from Adopted Plan
Multi-family	21,790	23,220	52,220	30,430	29,000
Single-family	4,730	4,780	4,780	50	0
<b>Grand Total</b>	<b>26,520</b>	<b>28,000</b>	<b>57,000</b>	<b>30,480</b>	<b>29,000</b>
CPU = Community Plan Update Source: City of San Diego 2020 Note: Existing units are from the November 2020 University Community Plan Update Adopted Plan Buildout Report.					

### 3.5.3.1 University Community Plan Update Components

#### a. Vision and Land Use Framework

The Vision and Land Use Framework chapter of the University CPU establishes the overarching priorities and land use plan for the University CPU area. The land use framework balances climate goals with the need for sustainable economic growth by focusing higher density and intensity land uses around transit and job centers. Planned land uses support employment and commercial activity and introduce residential areas through a new land use designation called the Urban Village designation where compatible with the Airport Land Use Compatibility Plan (Figure 3-19).

As indicated in Figure 3-19, the highest density Urban Village designations are centered around the Executive Drive and University Towne Center (UTC) Blue Line Trolley stops. The highest density residential areas are located along the La Jolla Village Drive and Nobel Drive corridors, while lower and medium density housing makes up most of the University CPU area south of Rose Canyon. Community Village designations, allowing a mix of residential and commercial uses, are found at major intersections throughout the University CPU area. Open Space, Scientific Research, and Light Industrial uses are also located in the University CPU area north of Rose Canyon.

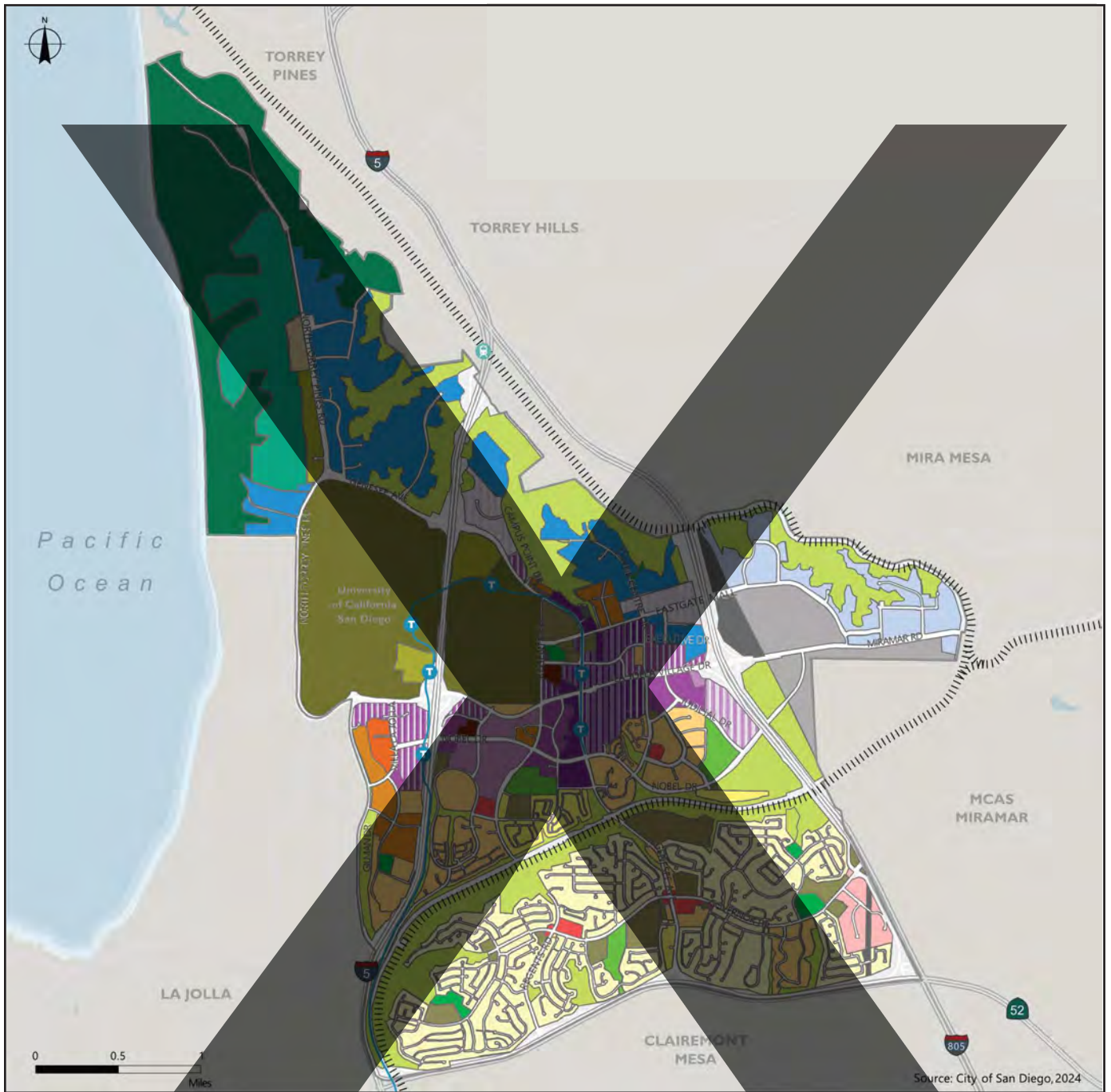
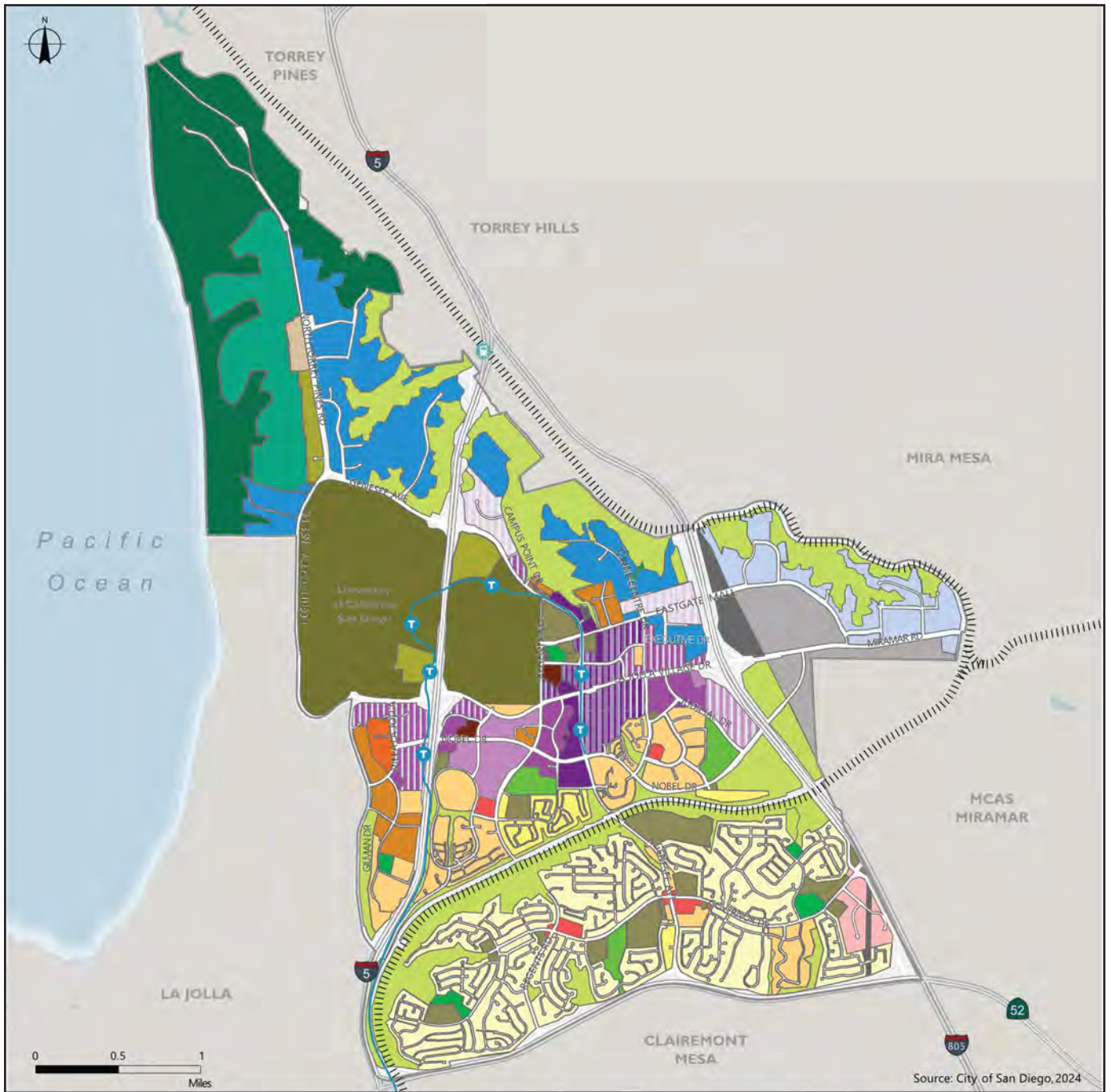


FIGURE 3-19

University Community Plan Update Proposed Land Uses





- |   |  |  |
|---|--|--|
|  Residential Low-2 (5-9 du/ac)         |  Urban Village Med-2 (0-54 du/ac, FAR up to 3.0)              |  Resource Based Park          |
|  Residential Low-3 (10-14 du/ac)       |  Urban Employment Village Med-2 (0-54 du/ac, FAR up to 3.0)   |  Open Space                   |
|  Residential Low-4 (15-29 du/ac)       |  Urban Village High-1 (0-109 du/ac, FAR up to 3.0)            |  Neighborhood Park            |
|  Residential Medium-1 (30-44 du/ac)    |  Urban Employment Village High-1 (0-109 du/ac, FAR up to 3.0) |  Community Park & Rec. Center |
|  Residential Medium-3 (55-73 du/ac)    |  Urban Village High-2 (0-145 du/ac, FAR up to 5.0)            |  Light Industrial             |
|  Residential Medium-4 (74-109 du/ac)   |  Urban Employment Village High-2 (0-145 du/ac, FAR up to 5.0) |  Institutional                |
|  Commercial Office Med-3 (0-73 du/ac)  |  Urban Village High-3 (0-218 du/ac, FAR up to 7.0)            |  UC San Diego                 |
|  Community Village Med-3 (0-73 du/ac)  |  Urban Employment Village High-3 (0-218 du/ac, FAR up to 7.0) |  Hospital                     |
|  Visitor Commercial Low-4 (0-29 du/ac) |  Scientific Research  |  Utility                      |
|   |  Golf Course  |  Military                     |

FIGURE 3-19

University Community Plan Update Proposed Land Uses

The Vision and Land Use Framework chapter includes the following goals:

- Encourage transit-oriented, mixed-use development centered around the Trolley stations and other major transit stops with high-frequency service.
- Establish a series of walkable, mixed-use urban villages across the University Community that support the housing and employment needs of the community and region.
- Increase the overall capacity of homes across the community to promote a better balance of jobs and housing.
- Promote the creation of a wide range of housing types that can accommodate various age groups, household sizes and compositions, and income levels.
- Revitalize shopping centers into mixed-use areas that provide quality neighborhood amenities alongside multi-family housing stock, while continuing to provide local goods and services.
- Support the future of the University Community as a regional employment center for biotech, life sciences, scientific research and development, and other base sector industries.
- Promote a land use pattern that seeks to reduce per capita GHG emissions and VMT.

Priorities:

- Support a Thriving Economy – Support biotech and life sciences, UCSD, and community--centered urban villages to reinforce the community's role as a major employment center.
- Maximizing Transit Investment Success – Increase connectivity between transit stops and public spaces, maximize transit-oriented development and create human-scale streetscapes to capitalize on the Blue Line Trolley Extension.
- Allowing a Variety of New Homes – Support a variety of housing options, including affordable and fair housing, for families, seniors, students, and service workers of all income levels.
- Ensuring a Sustainable Future – Co-locate housing and employment centers to reduce VMT and travel times, encourage sustainable building design, and promote open space to further CAP goals for reducing GHG emissions and lead to a more resilient future.
- Designing Streets for People – Reduce stress on cyclists, make walking/rolling a desirable option, and make transit more comfortable to improve people's overall mobility.

As part of the land use changes proposed with the University CPU, the Nexus Technology Centre Specific Plan would be rescinded. The Nexus Technology Centre Specific Plan includes Industrial and Scientific Research uses in a campus environment. The buildings within the Nexus Technology Centre Specific Plan area are low scale, similar in style, and symmetrically arranged around a formal plaza. The University CPU proposes a combination of Scientific Research and Urban Village land use designations for this area.

## **Affordable Homes Requirement**

The University CPU also includes Supplemental Development Regulation (SDR)-J.1 which states that development with a residential use shall comply with one of the following:

1. 1. Satisfy the Inclusionary Affordable Housing Regulations as set forth in Chapter 14, Article 2, Division 13 of the San Diego Municipal Code through either of the following:
  - a. Onsite Option. The construction of the affordable dwelling units on-site in accordance with San Diego Municipal Code section 142.1305(a)(1);
  - b. Offsite Option. The construction or rehabilitation of affordable units off-site within a Sustainable Development Area within the University Community Planning Area;
2. As an alternative to SDR-J.1(1), an applicant may elect to comply with one of the following options:
  - a. Pay the Inclusionary Affordable Housing In-Lieu Fee in accordance with San Diego Municipal Code Section 142.1305(a)(4), and provide a minimum of 5 percent of the total dwelling units affordable to households whose income does not exceed 80 percent of the area median income either constructed on-site or off-site within a Sustainable Development Area within the University Community Planning Area; or
  - b. Pay the Inclusionary Affordable Housing In-Lieu Fee in accordance with San Diego Municipal Code Section 142.1305(a)(4), and provide a minimum of 10 percent of the total dwelling units shall be affordable to households whose income does not exceed 120 percent of the area median income either constructed on-site or off-site within a Sustainable Development Area within the University Community Planning Area; or
  - c. Pay the Inclusionary Affordable Housing In-Lieu Fee in accordance with San Diego Municipal Code Section 142.1305(a)(4) at a rate of 200 percent the otherwise applicable fee.
- ~~1. Satisfy the Inclusionary Affordable Housing Regulations as set forth in Chapter 14, Article 2, Division 13 of the SDMC through either the provision of required affordable dwelling units on-site in accordance with SDMC section 142.1305(a)(1), or the construction or rehabilitation of affordable units off-site within a Sustainable Development Area within the University CPU area; or~~
- ~~2. Payment of the Inclusionary in Lieu Fee in accordance with SDMC Section 142.1305(a) (4), plus the provision of a minimum of 5 percent of the total dwelling units affordable to households whose income does not exceed 80 percent of the area median income either on-site or off-site within a Sustainable Development Area within the University CPU area; or~~
- ~~3. Payment of the Inclusionary in Lieu Fee in accordance with SDMC Section 142.1305(a) (4), plus a minimum of 10 percent of the total dwelling units which shall be affordable to households whose income does not exceed 120 percent of the area median income either on-site or off-site within a Sustainable Development Area within the University CPU area; or~~

4. ~~Payment of the Inclusionary in Lieu Fee in accordance with SDMC Section 142.1305(a) (4) at 180 percent of the fee per dwelling unit.~~

## **b. Urban Design**

The Urban Design chapter of the University CPU provides guidance to encourage the transformation of the community from an auto-centric area with separated land uses into a connected, mixed-use, transit-oriented community centered around a rich and vibrant public realm. The Urban Design chapter promotes transit-oriented development by focusing new development near transit infrastructure to promote walkability and accessibility. The Urban Design chapter encourages private development to provide privately-owned public open spaces, such as promenades, platforms, podiums, paseos, and plazas, to offer additional amenities that complement existing and planned parks and open space in the community.

The Urban Design chapter includes the following goals:

- A community that is orderly, visually pleasing, and contributes to a sense of place and context through the deliberate arrangement of buildings, open space, parking, and circulation.
- Development that contributes to vibrant, accessible, and comfortable public spaces and gathering areas that are integrated with building and landscape design to support social interaction, recreation, and everyday civic life.
- A pattern of growth that contributes to reduced automobile dependency, promotes transit access and multi-modal circulation, and maximizes the benefits of transit infrastructure in the community.
- A community with a clear and unique sense of place and community identity made evident in its streetscapes, parks and open spaces, canyons and mesas, buildings, art installations, and transit infrastructure.

The Urban Design chapter promotes the City of Villages strategy which focuses growth into mixed-use activity centers that are pedestrian-friendly, centers of community life, and linked to the regional transit system. As shown in Figure 2-7, the University CPU area is divided into six Urban Design Districts: North Torrey Pines, Campus Point & Towne Center, University Towne Center, Nobel/Campus, South University Neighborhood, and Miramar.

### ***North Torrey Pines***

The North Torrey Pines Urban Design District is in the northern portion of the University CPU area. The area is a prime employment center with jobs primarily in the healthcare, life sciences, and biotechnology industry. The North Torrey Pines Urban Design District is located just east of the Torrey Pines Golf Course and the Scripps Institution of Oceanography, and just north of UCSD and the Salk Institute for Biological Studies.

Although density is limited within this Urban Design District, there are still unrealized opportunities to intensify the area through the conversion of large surface parking lots and underdeveloped parcels and by exploring innovative life science and biotech-focused mixed use opportunities. As properties become re-envisioned due to changing needs, North Torrey Pines Road can be enhanced to provide a more pleasing streetscape. Enhancing connections to both the Trolley and Coaster stations will improve overall mobility of the area. In addition, making the most out of the proximity to open space (canyons, bluffs, and the ocean) will help establish a unique sense of place. This can be achieved through better connections to Torrey Pines State Park and Golf Course, in addition to the integration of more canyon overlooks.

### ***Campus Point & Towne Center***

The Campus Point and Towne Center Urban Design District is located just north of the core of the CPU area, along Campus Point Drive and Towne Centre Drive and is a prime employment center north of Genesee Avenue. The Campus Point & Towne Centre Urban Design District is served by the Voigt Drive Trolley Station and transit stops along Eastgate Mall. The Campus Point & Towne Centre Urban Design District includes Eastgate Mini Park #1 and #2 and is located just north of the Mandell Weiss Eastgate City Park.

This Urban Design District has the potential to redevelop underutilized lots and buildings into modern facilities including micro-mobility hubs, plazas, and other desirable amenities. Paseos can further link this area to the surrounding natural landscape by providing publicly accessible connections to recreational facilities located along the canyon rim, such as trails, paths, and outlooks.

### ***University Towne Center***

The University Towne Center Urban Design District is in the core of the University CPU area. The UTC Urban Design District is accessible by transit including the Executive Drive Trolley Station and the UTC Trolley Station located at the UTC Transit Center. The UTC Urban Design District is home to large employers, visitor destinations, and regional destinations, including the UTC shopping center. The UTC village area also includes Mandell Weiss Eastgate City Park, is adjacent to Doyle Elementary School and Community Park, and is just north of University City High School and Nobel Athletic Area and Library.

Many tall buildings and underdeveloped sites exist in this area. As underutilized areas are re-envisioned to serve new needs, there is an opportunity to establish a unique and iconic skyline and create a network of elevated walkways, plazas, and other public spaces connected to Trolley platforms. As new buildings are constructed and existing ones are updated, it is essential that they all provide an attractive ground floor and create a welcoming pedestrian experience at the street level. A new promenade along Executive Drive will provide a desirable community amenity and connect into a larger 3-mile "Neighborhood Connector" loop that offers fitness and recreation opportunities. Orienting buildings towards transit, breaking down large blocks with internal streets and paseos, and creating well-designed public spaces will help transition this area from an auto-oriented environment into the premier pedestrian district for the community.



### ***Nobel/Campus***

The Nobel/Campus Urban Design District is in the western portion of the University CPU area, just south of UCSD. The Nobel/Campus Urban Design District is home to several shopping centers, visitor destinations, and the Nobel Drive Trolley Station. The western portion of the Nobel/Campus Urban Design District is located a half-mile north of Villa La Jolla Park. The eastern portion of the Nobel/Campus Urban Design District is adjacent to Doyle Elementary School and Community Park and the proposed Regents Road North linear park, with access to Rose Canyon to the south.

Organizing new buildings around a north-south “main street” or other communal area that connects directly to the Trolley station can establish a stronger sense of place and clear connection to transit. Introducing a greater mix of uses, including retail goods and services, entertainment, office, and residential, supported by community gathering spaces and an improved public realm can create a vibrant neighborhood and welcoming sense of place.

### ***South University Neighborhood***

The South University Neighborhood Urban Design District is located in the southern portion of the University CPU area, south of Rose Canyon Open Space Park. The South University Neighborhood Urban Design District includes two shopping centers: UC Marketplace to the west and University Square shopping center to the east. The neighborhood includes both single-family and multi-family housing; is located near Spreckels and Marie Curie Elementary Schools, Standley Middle School, Standley Park and Recreation Center, the University Community Branch Library; and is just south of University City High School.

The vision for this area is to create a mixed-use village through infill development that complements existing residential and retail uses. With new development, there will be the opportunity to introduce more neighborhood-serving uses in the area and add opportunities related to the public realm, placemaking, and connectivity.

### ***Miramar***

The Miramar Urban Design District is in the eastern portion of the University CPU area, east of I-805. The Miramar Urban Design District consists of industrial, public utility, and military uses.

Providing employee-serving amenities, such as outdoor seating and shaded areas, can create pockets of activity and improve the public realm. The creation of a multi-use path along Eastgate Mall can provide a valuable connection between the University and Mira Mesa communities as well as improve access to UCSD-San Diego. This area experiences high temperatures and would benefit from the integration of trees, especially in areas where people congregate like bus stops. There are also opportunities to highlight resource conservation efforts, including water reclamation and vernal pools.

## c. Mobility

The University CPU Mobility chapter promotes improving active transportation, increasing transit accessibility, and embracing intelligent technologies and management strategies to help encourage more people to walk/roll, bike, or ride transit, and decrease their auto dependence. The Mobility chapter identifies mobility improvements such as planned bicycle classifications modifications, planned transit, potential transit, and planned roadway classification modifications. The proposed mobility improvements would support increased active transportation facilities to provide enhancements to streetscapes and street functionality that support pedestrian, bicycle, and transit activity and complete streets features wherever possible. The proposed mobility improvements are identified in Tables 3-6 and 3-7, below.

<b>Table 3-6</b>			
<b>University CPU Planned Bicycle Classifications Modifications</b>			
<u>Roadway</u>	<u>Segment</u>	<u>Existing Functional Classification</u>	<u>Planned Classification Designation</u>
<u>Arriba St</u>	<u>Palmilla Dr to Regents Rd</u>	<u>Class II</u>	<u>Class IV (One Way)</u>
<u>Arriba St</u>	<u>Regents Rd to Cargill Ave</u>	<u>N/A</u>	<u>Class III</u>
<u>Bothe Av</u>	<u>Rose Canyon End to Stresemann St</u>	<u>N/A</u>	<u>Class III</u>
<u>Callan Rd</u>	<u>N Torrey Pines Rd to Torreyana Rd</u>	<u>N/A</u>	<u>Class III</u>
<u>Campus Point Dr</u>	<u>North End to Genesee Ave</u>	<u>N/A</u>	<u>Class IV (Two Way)</u>
<u>Cargill Ave</u>	<u>Nobel Dr to Arriba St</u>	<u>N/A</u>	<u>Class III</u>
<u>Costa Verde Blvd</u>	<u>La Jolla Village Dr to Nobel Dr</u>	<u>N/A</u>	<u>Class II (Buffered)</u>
<u>Decoro St</u>	<u>Cargill Ave to Genesee Av</u>	<u>N/A</u>	<u>Class III</u>
<u>Eastgate Ml</u>	<u>Regents Rd to Genesee Ave</u>	<u>N/A</u>	<u>Class II (WB) / Class IV (One-Way) (EB)</u>
<u>Eastgate Ml</u>	<u>Genesee Ave to Judicial Dr</u>	<u>Class II **</u>	<u>Class IV (One Way)</u>
<u>Eastgate Ml</u>	<u>Judicial Dr to I-805 Overpass</u>	<u>Class II **</u>	<u>Class II (WB) / Class IV (Two-Way) (EB)</u>
<u>Eastgate Ml</u>	<u>I-805 Overpass to Olson Dr</u>	<u>Class II **</u>	<u>Class IV (Two Way) (EB)</u>
<u>Eastgate Ml</u>	<u>Olson Dr to Miramar Rd</u>	<u>N/A</u>	<u>Class IV (Two Way) (EB)</u>
<u>Executive Dr</u>	<u>Regents Rd to Judicial Dr</u>	<u>N/A</u>	<u>Class IV (One-Way)</u>
<u>Executive Wy</u>	<u>Executive Dr to La Jolla Village Dr</u>	<u>N/A</u>	<u>Class IV (Two-Way)</u>
<u>Genesee Ave</u>	<u>N Torrey Pines Rd to I-5 NB Ramps</u>	<u>Class II</u>	<u>Class IV (One Way, Two Lanes)</u>
<u>Genesee Ave</u>	<u>I-5 NB Ramps to Scripps Hospital Drwy</u>	<u>Class II</u>	<u>Class II (SB) / Class I (One Way) (NB)</u>
<u>Genesee Ave</u>	<u>Scripps Hospital Drwy to SR-52 EB Ramps</u>	<u>Class II</u>	<u>Class IV (One-Way)</u>
<u>Gilman Dr</u>	<u>La Jolla Village Dr to La Jolla Colony Dr</u>	<u>Class II</u>	<u>Class IV (One-Way)</u>

**Table 3-6**  
**University CPU Planned Bicycle Classifications Modifications**

<u>Roadway</u>	<u>Segment</u>	<u>Existing Functional Classification</u>	<u>Planned Classification Designation</u>
<u>Governor Dr</u>	<u>Stresemann St to Genesee Ave</u>	<u>N/A</u>	<u>Class II (Buffered)</u>
<u>Governor Dr</u>	<u>Genesee Ave to Kantor St</u>	<u>Class II **</u>	<u>Class II (Buffered)</u>
<u>Governor Dr</u>	<u>Kantor St to I-805 NB Ramps</u>	<u>Class III</u>	<u>Class II (Buffered)</u>
<u>Greenwich Dr</u>	<u>Governor Dr to Shoreham Pl</u>	<u>N/A</u>	<u>Class II (Buffered)</u>
<u>Greenwich Dr</u>	<u>Shoreham Pl to East End</u>	<u>N/A</u>	<u>Class III</u>
<u>Gullstrand St</u>	<u>Florey St to Governor Dr</u>	<u>N/A</u>	<u>Class III</u>
<u>Judicial Dr</u>	<u>Eastgate MI to Nobel Dr</u>	<u>Class II</u>	<u>Class IV (One Way)</u>
<u>La Jolla Colony Dr</u>	<u>Gilman Dr to Palmilla Dr</u>	<u>Class II</u>	<u>Class IV (One Way)</u>
<u>La Jolla Village Dr</u>	<u>N Torrey Pines Rd to I-805 NB Ramps</u>	<u>N/A</u>	<u>Class IV (One Way)</u>
<u>Lebon Dr</u>	<u>Palmilla Dr to Nobel Dr</u>	<u>Class III</u>	<u>Class II (Buffered)</u>
<u>Lebon Dr</u>	<u>Nobel Dr to La Jolla Village Dr</u>	<u>N/A</u>	<u>Class II (Buffered)</u>
<u>Miramar Rd</u>	<u>I-805 NB Ramps to Nobel Dr</u>	<u>Class II</u>	<u>Class IV (One-Way)</u>
<u>Miramar Rd</u>	<u>Nobel Dr to Camino Santa Fe</u>	<u>Class II</u>	<u>Class IV (One-Way) (WB) / Class IV (Two-Way) (EB)</u>
<u>Nobel Dr</u>	<u>Villa La Jolla Dr to University Center Ln</u>	<u>Class II</u>	<u>Class IV (One Way)</u>
<u>Nobel Dr</u>	<u>University Center Ln to Lebon Dr</u>	<u>Class III</u>	<u>Class I (One Way) (WB) / Class IV (One Way) (EB)</u>
<u>Nobel Dr</u>	<u>Lebon Dr to Danica Mae Dr</u>	<u>Class II</u>	<u>Class I (One Way) (WB) / Class IV (One Way) (EB)</u>
<u>Nobel Dr</u>	<u>Danica Mae Dr to Regents Rd</u>	<u>Class III</u>	<u>Class I (One Way) (WB) / Class IV (One Way) (EB)</u>
<u>Nobel Dr</u>	<u>Regents Rd to Genesee Ave</u>	<u>Class II</u>	<u>Class IV (One Way)</u>
<u>Nobel Dr</u>	<u>Genesee Ave to Towne Centre Dr</u>	<u>Class III</u>	<u>Class IV (One Way)</u>
<u>Nobel Dr</u>	<u>Towne Centre Dr to Miramar Rd</u>	<u>Class II</u>	<u>Class IV (One Way)</u>
<u>North Torrey Pines Rd</u>	<u>NU System Drwy to Genesee Av</u>	<u>Class II</u>	<u>Class IV (One Way)</u>
<u>Palmilla Dr</u>	<u>Arriba St to La Jolla Colony Dr</u>	<u>Class II</u>	<u>Class II (SB) / Class IV (One Way) (NB)</u>
<u>Regents Rd</u>	<u>Executive Dr to Mahaila Ave/Plaza de Palmas</u>	<u>Class II</u>	<u>Class IV (One Way)</u>
<u>Regents Rd</u>	<u>Mahaila Ave/Plaza de Palmas to Nobel Dr</u>	<u>N/A</u>	<u>Class IV (One Way)</u>
<u>Regents Rd</u>	<u>Nobel Dr to Arriba St</u>	<u>N/A</u>	<u>Class IV (One Way)</u>
<u>Regents Rd</u>	<u>Arriba St to Rose Canyon End</u>	<u>N/A</u>	<u>Class I (Two Way) (SB) / Class III (NB)</u>

**Table 3-6**  
**University CPU Planned Bicycle Classifications Modifications**

<u>Roadway</u>	<u>Segment</u>	<u>Existing Functional Classification</u>	<u>Planned Classification Designation</u>
<u>Regents Rd</u>	<u>Rose Canyon End to Governor Dr</u>	<u>N/A</u>	<u>Class III</u>
<u>Regents Rd</u>	<u>Governor Dr to SR-52 WB Ramps</u>	<u>Class II</u>	<u>Class IV (One Way)</u>
<u>Renaissance Ave</u>	<u>Towne Centre Dr to Golden Haven Dr</u>	<u>N/A</u>	<u>Class II (Buffered)</u>
<u>Science Park Rd</u>	<u>N Torrey Pines Rd to Torreyana Rd</u>	<u>N/A</u>	<u>Class III</u>
<u>Shoreline Dr</u>	<u>Renaissance Ave to Nobel Dr</u>	<u>N/A</u>	<u>Class II (Buffered)</u>
<u>Stresemann St</u>	<u>Governor Dr to Bothe Av</u>	<u>N/A</u>	<u>Class III</u>
<u>Torreyana Rd</u>	<u>Callan Rd to Science Park Rd</u>	<u>N/A</u>	<u>Class III</u>
<u>Towne Centre Dr</u>	<u>North End to Towne Centre Ct</u>	<u>N/A</u>	<u>Class III</u>
<u>Towne Centre Dr</u>	<u>Towne Centre Ct to Nobel Dr</u>	<u>N/A</u>	<u>Class II (Buffered)</u>
<u>University Center Ln</u>	<u>Nobel Dr to Lebon Dr</u>	<u>N/A</u>	<u>Class IV (One Way)</u>
<u>Villa La Jolla Dr</u>	<u>La Jolla Village Dr to Gilman Dr</u>	<u>Class III</u>	<u>Class IV (One Way)</u>

\*\* = Can include partial facilities through the listed segment

**Table 3-7**  
**University CPU Planned Roadway Classifications Modifications**

<u>Roadway</u>	<u>Segment</u>	<u>Existing Functional Classification</u>	<u>Planned Classification Designation</u>
<u>Arriba St</u>	<u>Palmilla Dr to Regents Rd</u>	<u>4-Ln Major Arterial</u>	<u>2-Ln Major Arterial</u>
<u>Eastgate Mall</u>	<u>Judicial Dr to I-805 Overpass</u>	<u>4-Ln Major Arterial</u>	<u>3-Ln Major Arterial</u>
<u>Executive Dr</u>	<u>Regents Rd to Judicial Dr</u>	<u>4-Ln Collector w/ TWLTL</u>	<u>2-Ln Collector w/ TWLTL</u>
<u>Executive Way</u>	<u>Executive Dr to La Jolla Village Dr</u>	<u>4-Ln Collector w/ TWLTL</u>	<u>2-Ln Collector w/ TWLTL</u>
<u>Genesee Ave</u>	<u>N Torrey Pines Rd to I-5 SB Ramp</u>	<u>6-Ln Prime Arterial</u>	<u>4-Ln Prime Arterial</u>
<u>Genesee Ave</u>	<u>I-5 SB Ramps to I-5 NB Ramps</u>	<u>6-Ln Major Arterial</u>	<u>6-Ln Prime Arterial (w/ Flex Lanes) (SMART)</u>
<u>Genesee Ave</u>	<u>I-5 NB Ramps to Campus Point Dr</u>	<u>6-Ln Prime Arterial</u>	<u>6-Ln Prime Arterial (w/ Flex Lanes) (SMART)</u>
<u>Genesee Ave</u>	<u>Campus Point Dr to La Jolla Village Dr</u>	<u>6-Ln Major Arterial</u>	<u>6-Ln Prime Arterial (w/ Flex Lanes) (SMART)</u>
<u>Genesee Ave</u>	<u>La Jolla Village Dr to Esplanade Ct</u>	<u>6-Ln Major Arterial</u>	<u>6-Ln Prime Arterial (w/ Flex Lanes) (SMART)</u>
<u>Genesee Ave</u>	<u>Esplanade Ct to Nobel Dr</u>	<u>6-Ln Major Arterial</u>	<u>6-Ln Prime Arterial (w/ Flex Lanes) (SMART)</u>

**Table 3-7**  
**University CPU Planned Roadway Classifications Modifications**

<u>Roadway</u>	<u>Segment</u>	<u>Existing Functional Classification</u>	<u>Planned Classification Designation</u>
<u>Genesee Ave</u>	<u>Nobel Dr to SR-52 WB Ramp</u>	<u>4-Ln Major Arterial</u>	<u>4-Ln Major Arterial (w/ Flex Lanes) (SMART) *</u>
<u>Gilman Dr</u>	<u>La Jolla Village Dr to Villa La Jolla Dr</u>	<u>4-Ln Major Arterial</u>	<u>4-Ln Major Arterial (w/ Flex Lanes)</u>
<u>Governor Dr</u>	<u>Greenwich Dr to Regents Rd</u>	<u>4-Ln Major Arterial</u>	<u>2-Ln Major Arterial</u>
<u>Governor Dr</u>	<u>Regents Rd to Dunant St</u>	<u>4-Ln Major Arterial</u>	<u>2-Ln Collector w/ TWLTL</u>
<u>Governor Dr</u>	<u>Dunant St to Stresemann St</u>	<u>4-Ln Major Arterial</u>	<u>2-Ln Major Arterial</u>
<u>La Jolla Colony Dr</u>	<u>Palmilla Dr to I-5 NB Ramps</u>	<u>4-Ln Collector</u>	<u>2-Ln Collector w/ TWLTL</u>
<u>La Jolla Village Dr</u>	<u>Torrey Pines Rd to Villa La Jolla Dr</u>	<u>6-Ln Prime Arterial</u>	<u>6-Ln Prime Arterial (w/ Flex Lanes)</u>
<u>La Jolla Village Dr</u>	<u>Villa La Jolla Dr to I-5 SB Ramps</u>	<u>7-Ln Prime Arterial (4 EB, 3WB + 1 WB aux)</u>	<u>7-Ln Prime Arterial (w/ Flex Lanes)</u>
<u>La Jolla Village Dr</u>	<u>I-5 SB Ramps to I-5 NB Ramps</u>	<u>6-Ln Prime Arterial (+1 EB aux)</u>	<u>6-Ln Prime Arterial (w/ Flex Lanes) (SMART)</u>
<u>La Jolla Village Dr</u>	<u>I-5 NB Ramps to Towne Centre Dr</u>	<u>6-Ln Major Arterial</u>	<u>6-Ln Major Arterial (w/ Flex Lanes) (SMART)</u>
<u>La Jolla Village Dr</u>	<u>Towne Centre Dr to I-805 SB Ramps</u>	<u>7-Ln Major Arterial (4 WB, 3 EB + 1 aux)</u>	<u>6-Ln Major Arterial (w/ Flex Lanes) (SMART)</u>
<u>Lebon Dr</u>	<u>Palmilla Dr to Nobel Dr</u>	<u>4-Ln Major Arterial</u>	<u>2-Ln Major Arterial</u>
<u>Lebon Dr</u>	<u>Nobel Dr to La Jolla Village Dr</u>	<u>5-Ln Major Arterial</u>	<u>3-Ln Major Arterial</u>
<u>Miramar Rd</u>	<u>I-805 SB Ramps to I-805 NB Ramps</u>	<u>6-Ln Major Arterial</u>	<u>6-Ln Major Arterial (w/ Flex Lanes) (SMART)</u>
<u>Miramar Rd</u>	<u>I-805 NB Ramps to Nobel Dr</u>	<u>8-Ln Prime Arterial</u>	<u>8-Ln Prime Arterial (w/ Flex Lanes)</u>
<u>Miramar Rd</u>	<u>Nobel Dr to Eastgate Mall</u>	<u>7-Ln Prime Arterial</u>	<u>7-Ln Prime Arterial (w/ Flex Lanes)</u>
<u>Miramar Rd</u>	<u>Eastgate Mall to Camino Santa Fe</u>	<u>6-Ln Major Arterial</u>	<u>6-Ln Major Arterial (w/ Flex Lanes)</u>
<u>Nobel Dr</u>	<u>Villa La Jolla Dr to University Center Ln</u>	<u>4-Ln Major Arterial</u>	<u>4-Ln Major Arterial (w/ Flex Lanes)</u>
<u>Nobel Dr</u>	<u>University Center Ln to Genesee Ave</u>	<u>6-Ln Major Arterial</u>	<u>6-Ln Major Arterial (w/ Flex Lanes) (SMART)</u>
<u>Nobel Dr</u>	<u>Genesee Ave to Town Center Dr</u>	<u>4-Ln Major Arterial</u>	<u>4-Ln Major Arterial (w/ Flex Lanes) (SMART)</u>

<b>Table 3-7 University CPU Planned Roadway Classifications Modifications</b>			
<u>Roadway</u>	<u>Segment</u>	<u>Existing Functional Classification</u>	<u>Planned Classification Designation</u>
<u>Nobel Dr</u>	<u>Towne Centre Dr to Judicial Dr</u>	<u>6-Ln Major Arterial</u>	<u>6-Ln Major Arterial (w/ Flex Lanes) (SMART)</u>
<u>Nobel Dr</u>	<u>Judicial Dr to I-805 NB Ramps</u>	<u>5-Ln Prime Arterial</u>	<u>5-Ln Major Arterial (w/ Flex Lanes) (SMART)</u>
<u>Regents Rd</u>	<u>Genesee Ave to Eastgate Mall</u>	<u>4-Ln Major Arterial</u>	<u>4-Ln Major Arterial</u>
<u>Regents Rd</u>	<u>Executive Dr to La Jolla Village Dr</u>	<u>4-Ln Collector w/ TWLTL</u>	<u>4-Ln Major Arterial</u>
<u>Regents Rd</u>	<u>Nobel Dr to Arriba St</u>	<u>4-Ln Major Arterial</u>	<u>4-Ln Major Arterial</u>
<u>Regents Rd</u>	<u>Arriba St to Rose Canyon terminus</u>	<u>4-Ln Major Arterial</u>	<u>2-Ln Collector</u>
<u>Villa La Jolla Dr</u>	<u>Gilman Dr to La Jolla Village Dr</u>	<u>4-Ln Major Arterial</u>	<u>4-Ln Major Arterial (w/ Flex Lanes)</u>
<p><u>Notes:</u></p> <p><u>#-Ln = Number of Lanes; SM = Striped Median; TWLTL = Two-Way Left-Turn Lane; * = Queue jumps or other transit improvements may be included in lieu of flex lanes based on available right-of-way</u></p> <p><u>A SMART Corridor is a Major Arterial that provides access to or between at least two freeways, whereby mobility improvements are made for transit and other congestion-reducing mobility forms through the repurposing of roadway space.</u></p>			

Figure 3-20 illustrates the existing and planned bicycle facilities for those roadways. Figure 3-21 depicts future pedestrian routes within the plan area. Figure 3-22 shows planned transit facilities while Figure 3-23 shows potential transit facilities. Planned roadway classifications for the plan area are shown in Figure 3-24.



**Existing Facilities to Remain**

- Class I - Bicycle Trail / Multi-Use Path
- Class II - Standard/Buffered Bicycle Lane
- Class II - (One-Way, Two Lanes)
- UC San Diego Bike Network
- Active Transportation Bridge

**Planned Improvements**

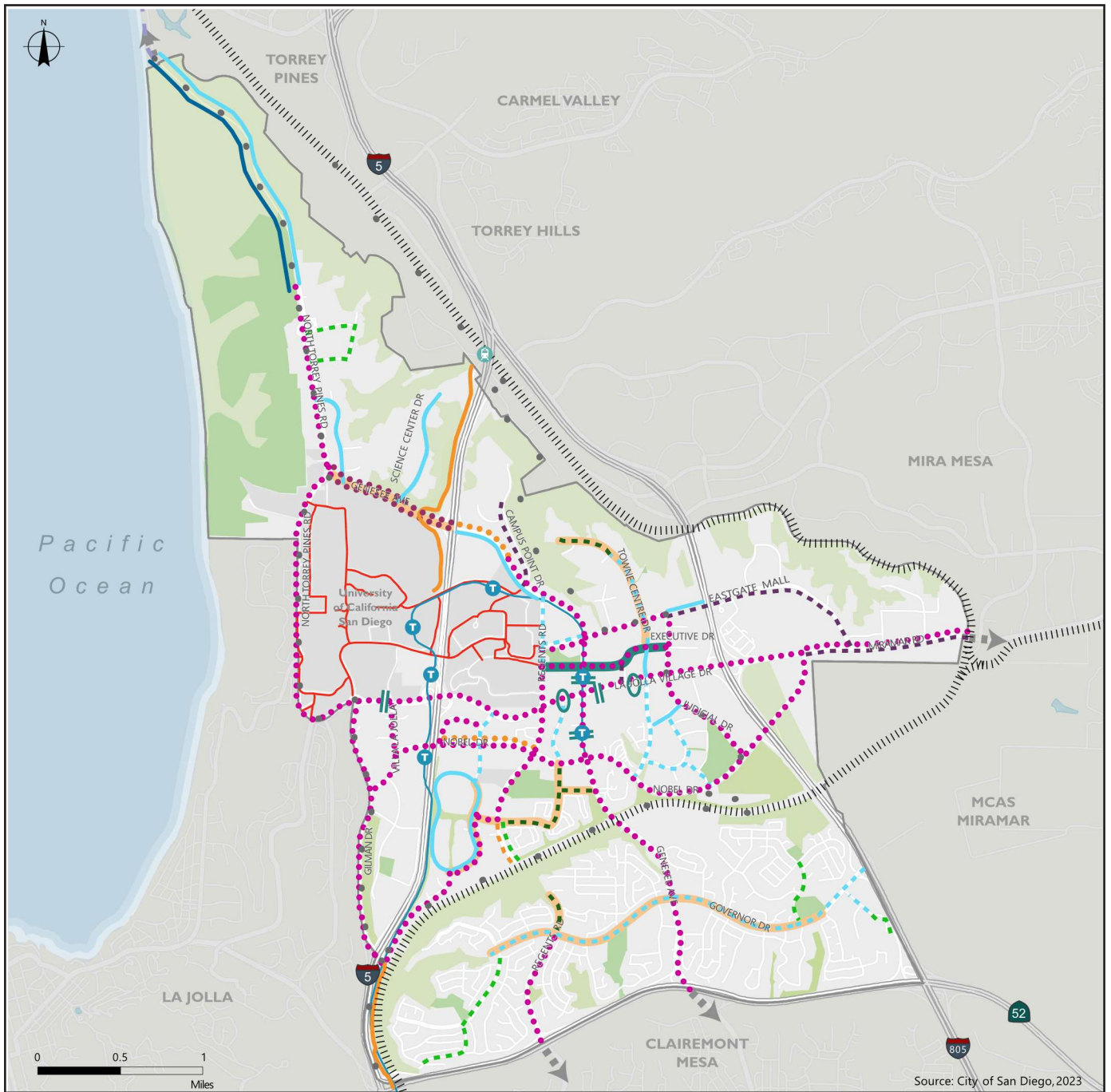
- ⋯ Class I - One-Way Multi-Use Path
- ⋯ Class I - Two-Way Bicycle Trail / Multi-Use Path
- ⋯ Class II - Standard/Buffered Bicycle Lane
- ⋯ Class III - Bicycle Route
- ⋯ Class III - Bicycle Boulevard
- ⋯ Class IV - Cycle Track (One-Way)
- ⋯ Class IV - Cycle Track (One-Way, Two Lanes)
- ⋯ Class IV - Cycle Track (Two-Way)
- Pedestrian Improvement
- Traffic Calming Enhancements
- Promenade

- SANDAG 2021 Regional Plan Adopted Regional Bike Network
- ⋯ Bicycle Facility in or Planned for Adjacent Community

**FIGURE 3-20**

**University Community Plan Planned Bicycle Facilities**





**Existing Facilities to Remain**

- Class I - Bicycle Trail / Multi-Use Path
- Class II - Standard/Buffered Bicycle Lane
- Class II - (One-Way, Two Lanes)
- UC San Diego Bike Network
- Active Transportation Bridge

**Planned Improvements**

- ⋯ Class I - One-Way Multi-Use Path
- - - Class I - Two-Way Bicycle Trail / Multi-Use Path
- ⋯ Class II - Standard/Buffered Bicycle Lane
- ⋯ Class III - Bicycle Route
- - - Class III - Bicycle Boulevard
- ⋯ Class IV - Cycle Track (One-Way)
- - - Class IV - Cycle Track (One-Way, Two Lanes)
- - - Class IV - Cycle Track (Two-Way)
- Pedestrian Improvement
- Traffic Calming Enhancements
- Promenade

- ⋯ Future Bike Connection - See Policy 3.3-1
- - - Bicycle Facility in or Planned for Adjacent Community






**FIGURE 3-20**

**University Community Plan Planned Bicycle Facilities**





Existing Transportation

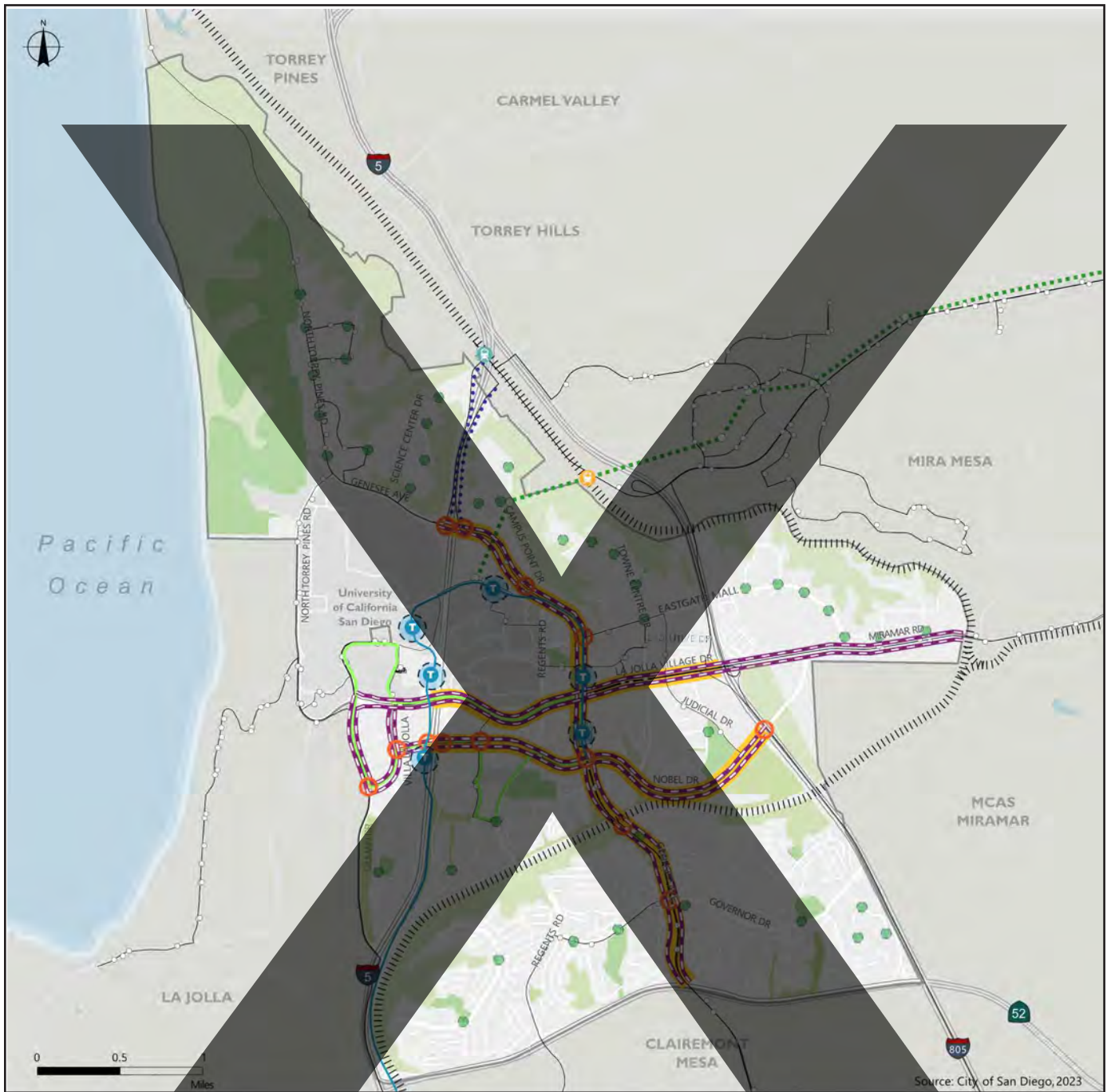
-  Coaster Station
-  Railroad
-  Mid-Coast Trolley Extension
-  Trolley Station
-  Active Transportation Bridge

Planned Pedestrian Typology

-  Connector
-  Corridor
-  District
-  Path
-  Ancillary Facility
-  Pedestrian Improvement

FIGURE 3-21

University Community Plan Planned Pedestrian Facilities



Source: City of San Diego, 2023

**Existing Transit**

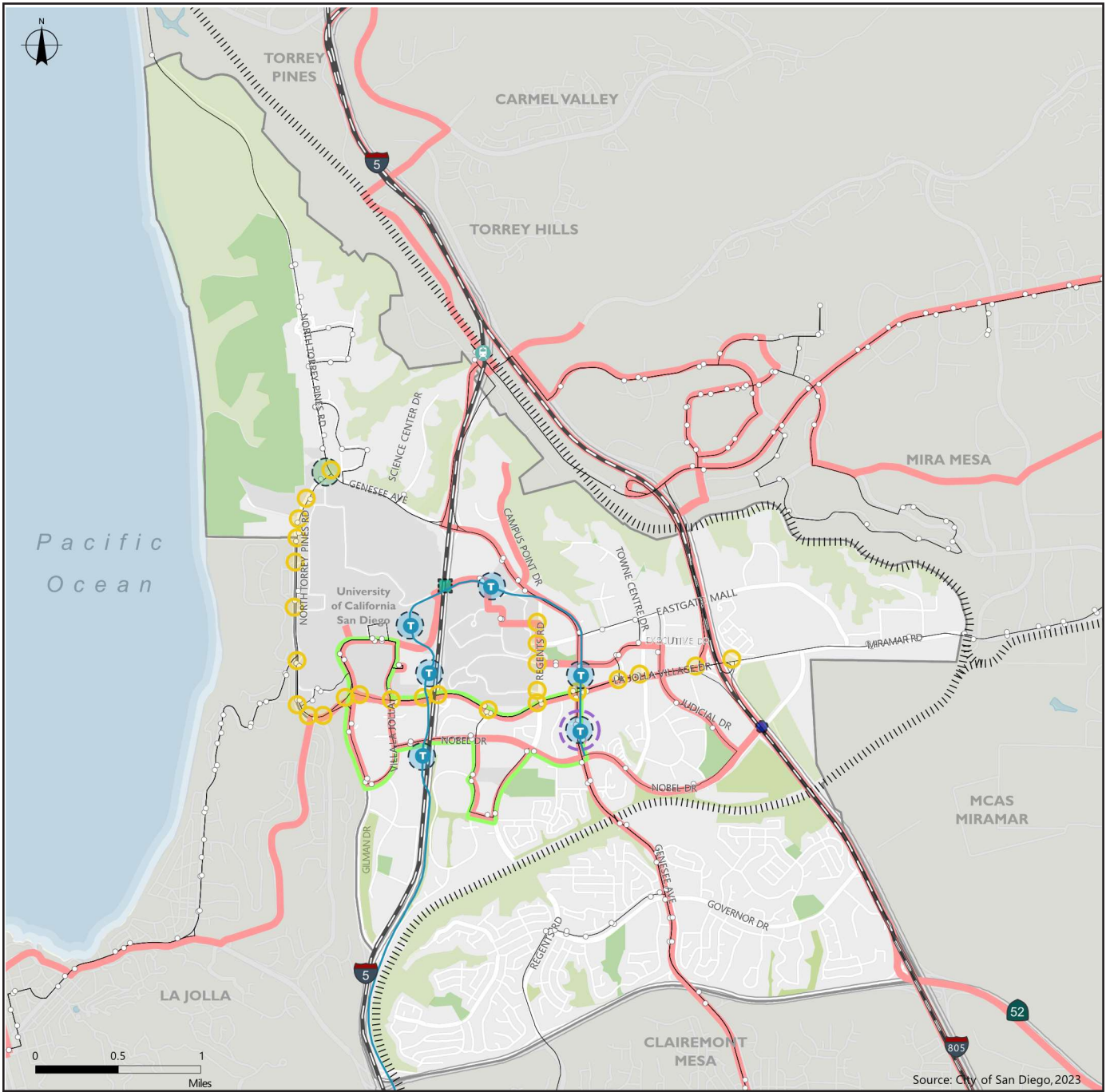
- Mid-Coast Trolley Extension
- Trolley Station
- Coaster Station
- COASTER/Amtrak
- Existing Transit Route
- Bus Stop
- SuperLoop
- Existing MobilityHub

**Potential Improvements**

- Aerial Skyway Alignment Options/Skyway Stops
- Proposed Coaster Station Relocation
- Micromobility Hub
- Bus On Shoulder
- Flexible Lane
- Adaptive Signal Timing/Transit Signal Priority
- SMART Corridor









**FIGURE 3-22**  
University Community Plan Planned Transit Facilities












Source: City of San Diego, 2023

**Existing Transit**

-  MTS Trolley
-  Trolley Station
-  Coaster Station
-  COASTER/Amtrak
-  Existing Transit Route
-  Bus Stop
-  SuperLoop
-  Existing Mobility Hub

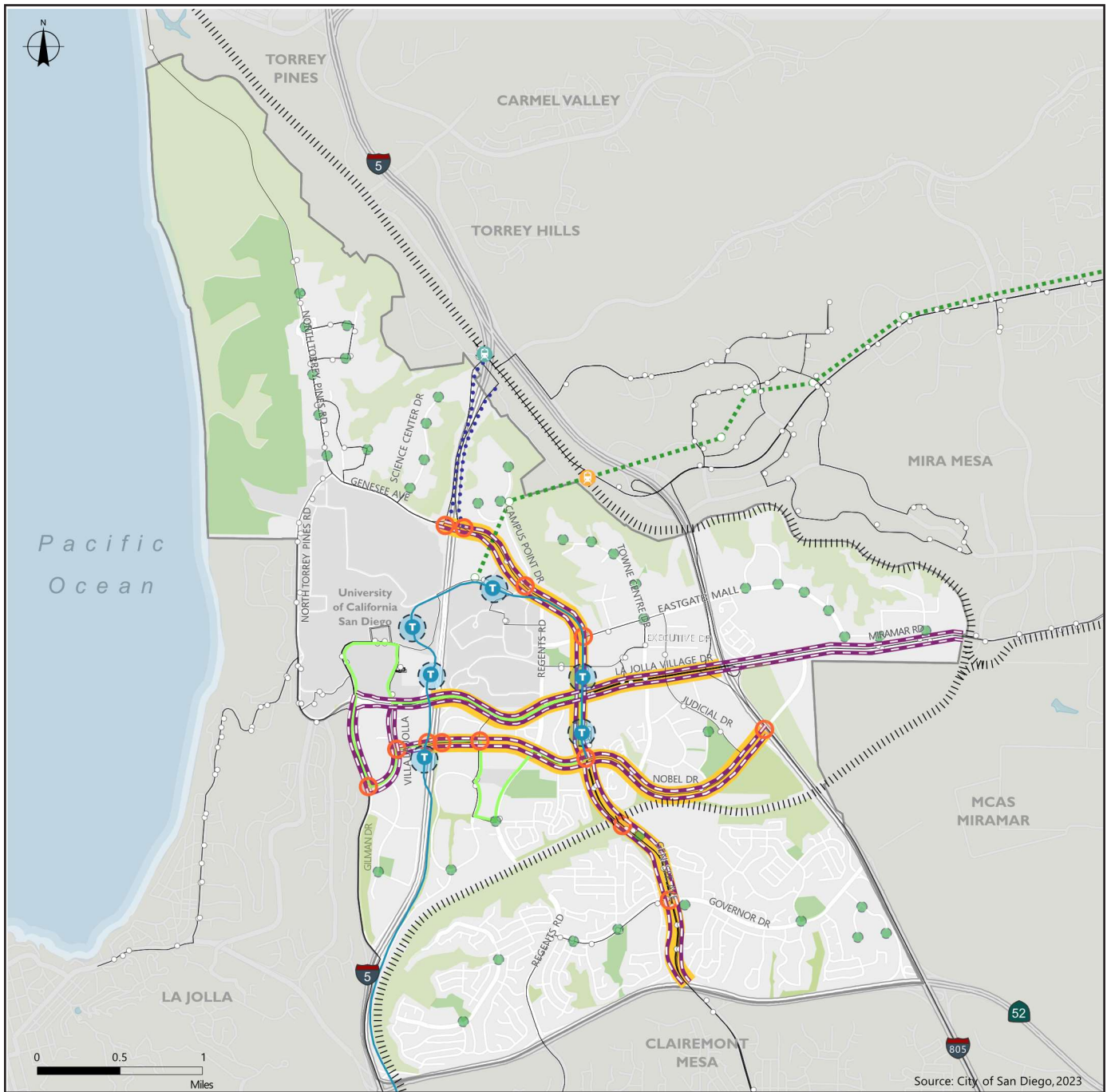
**Planned Improvements - as currently reflected in the RTP \***

-  Managed Lanes
-  Adaptive Signal Timing/Transit Signal Priority
-  Next Gen Rapid
-  Future Direct Access Ramp
-  Future Transit Operational Improvement
-  Planned Mobility Hub
-  Future Purple Line Station

\*SANDAG's current 2021 Regional Plan and is subject to change or be modified in subsequent Regional Plan Updates or transit corridor studies.

**FIGURE 3-22**

**University Community Plan Planned Transit Facilities**



Source: City of San Diego, 2023

**Existing Transit**

- Mid-Coast Trolley Extension
- Trolley Station
- Coaster Station
- COASTER/Amtrak
- Existing Transit Route
- Bus Stop
- SuperLoop
- Existing Mobility Hub

**Potential Improvements**

- Aerial Skyway Alignment Options/Skyway Stops
- Proposed Coaster Station Relocation
- Micromobility Hub
- Bus On Shoulder
- Flexible Lane
- Adaptive Signal Timing/Transit Signal Priority
- SMART Corridor

**FIGURE 3-23**  
University Community Plan Potential Transit Facilities





**Planned Street Classification Network**

- |  |                                       |  |                                       |  |                                       |
|--|---------------------------------------|--|---------------------------------------|--|---------------------------------------|
|  | 2-Lane Collector                      |  | 4-Lane Collector (w/ TWLTL)           |  | 6-Lane Major Arterial                 |
|  | 2-Lane Collector (w/ TWLTL)           |  | 4-Lane Major Arterial                 |  | 6-Lane Prime Arterial                 |
|  | 2-Lane Major Arterial                 |  | 4-Lane Major Arterial (w/ flex lanes) |  | 6-Lane Prime Arterial (w/ flex lanes) |
|  | 2-Lane Major Arterial (w/ flex lanes) |  | 4-Lane Prime Arterial                 |  | SMART Corridor                        |
|  | 3-Lane Collector                      |  | 4-Lane Prime Arterial (w/ flex lanes) |  |                                       |
|  | 3-Lane Major Arterial                 |  | 5-Lane Major Arterial                 |  |                                       |
|  | 3-Lane Major Arterial (w/ flex lanes) |  | 5-Lane Prime Arterial (w/ flex lanes) |  |                                       |

\*TWLTL: Two-Way Left Turn Lane

**FIGURE 3-24**  
University Community Plan Planned Roadway Network



Planned Roadway Classification Network

- |  |                             |  |                                       |  |                                       |
|--|-----------------------------|--|---------------------------------------|--|---------------------------------------|
|  | 2-Lane Collector            |  | 4-Lane Collector (w/ TWLTL)           |  | 6-Lane Major Arterial                 |
|  | 2-Lane Collector (w/ TWLTL) |  | 4-Lane Major Arterial                 |  | 6-Lane Prime Arterial                 |
|  | 2-Lane Major Arterial       |  | 4-Lane Major Arterial (w/ flex lanes) |  | 6-Lane Major Arterial (w/ flex lanes) |
|  | 3-Lane Collector            |  | 4-Lane Prime Arterial                 |  | 6-Lane Prime Arterial (w/ flex lanes) |
|  | 3-Lane Collector (w/ TWLTL) |  | 5-Lane Major Arterial                 |  | 7-Lane Prime Arterial (w/ flex lanes) |
|  | 3-Lane Major Arterial       |  | 5-Lane Major Arterial (w/ flex lanes) |  | 8-Lane Prime Arterial (w/ flex lanes) |
|  |                             |  |                                       |  | SMART Corridor                        |

\*TWLTL: Two-Way Left Turn Lane

FIGURE 3-24

University Community Plan Planned Roadway Network

The Mobility chapter includes the following goals:

- A connected and integrated transportation network that prioritizes active transportation and improves personal mobility to schools, residences, activity centers and employment hubs within the community and throughout the region.
- A balanced, multimodal transportation network that prioritizes safe, accessible, sustainable, and enjoyable travel options for all users.
- Enhanced access to public transit, linkages within the community, the City of San Diego and the region, and opportunities to increase transit ridership.
- A mobility system that embraces emerging technologies, smart infrastructure, and is aimed at improving mobility options, efficiency, and meeting CAP goals for the transportation system.

#### **d. Parks and Recreation**

The Parks and Recreation chapter of the University CPU promotes a well-connected system of parks, recreational facilities, and open space that provide opportunities for passive and active recreation, social interaction, community gatherings, the enhancement of the public realm, and the protection of sensitive natural resources. The Parks and Recreation chapter promotes trail maintenance and improvements, the enhancement of existing parks to increase their recreational value, as well as the addition of new parks, either through the acquisition of public parkland, the redevelopment of City-owned sites and rights-of-way, or development in collaboration with new residential developments and improvements to the public realm. Figure 3-25 identifies existing and proposed parks and Figure 3-26 identifies existing ~~and proposed~~ trails.

To meet the guidelines for a minimum of 100 Recreation Value-Base points per 1,000 residents, the University community's projected 2050 population of ~~144,200~~ 129,566 results in a need for ~~12,957~~ 14,400 Recreational Value Points to meet General Plan standards. To meet the guidelines for a minimum of 17,000 square feet per 25,000 residents, the University community's projected 2050 population results in the need for ~~98,000~~ 88,100 square feet of recreation center building space to meet ~~General Plan~~ Parks Master Plan standards (1 recreation center per 25,000 residents). The need is the equivalent of ~~5.25~~ 7 recreation centers sized at 17,000 square feet each. To meet the aquatic complex guidelines (an aquatic complex serves a population of 50,000), the University community's projected population results in the need for approximately ~~2.82~~ 6 aquatic complexes to meet the ~~General Plan~~ Parks Master Plan standard.

The Parks and Recreation chapter includes the following goals:

- Expand park equity by meeting the needs of a broad range of users of all ages and abilities, including children and teenagers of all ages and genders, seniors, and persons with disabilities.
- Increase recreational value by keeping pace with population growth through additional investments in existing parks, acquisition of additional available land for parks, and the additional new parks and public spaces as part of new private development projects.
- Maximize park access by strategically investing in existing parks and developing new parks and recreational facilities in/near Urban Villages and employment areas more widely accessible by transit and bicycle and pedestrian facilities.
- Improve overall park connectivity by linking population-based parks with resource-based parks and open space lands through a system of pedestrian paths, bikeways, and transit.
- Promote sustainability by utilizing “green technology” and other sustainable practices, such as “green streets” that double as pedestrian amenities and stormwater infrastructure.
- Protect, preserve, and restore natural areas and sensitive biological resources.
- Incorporate resiliency into parks and open space planning through implementation of conservation and landscape management strategies that address climate change.
- Establish an open space system that will utilize the terrain and natural drainage system to guide the form of urban development, enhance neighborhood identity, and separate incompatible land uses.

## e. Open Space and Conservation

The Open Space and Conservation chapter promotes the preservation and enhancement of resources within the plan area. As shown in Figure 3-27, the University CPU proposes to dedicate several City-owned properties as open space pursuant to Charter Section 55. Total acreage of open space dedication includes approximately ~~164~~ 166 acres of land including the Nobel Hill and Nobel “bowtie” properties located just north of Rose Canyon. These two additions would provide a continuous connection of Multi-Habitat Planning Area (MHPA) lands through Rose Canyon connecting existing City-owned open space and private open space easements. The Roselle Canyon and Sorrento Headlands properties to be dedicated are located north of Genesee Avenue, east of I-5 and west of I-805 before both interstates merge. These properties are part of a larger continuous open space system under conservation in both public and private ownership.

The project includes MHPA boundary line corrections to add a total of approximately 25.97 acres of City-owned land into the MHPA (Figure 3-28). Additionally, approximately 2.70 acres of City-owned right-of-way traversing Rose Canyon, located within the MHPA, would be vacated, at a future date, and the MHPA conservation status changed from MHPA 75 percent conserved to MHPA 100 percent conserved.



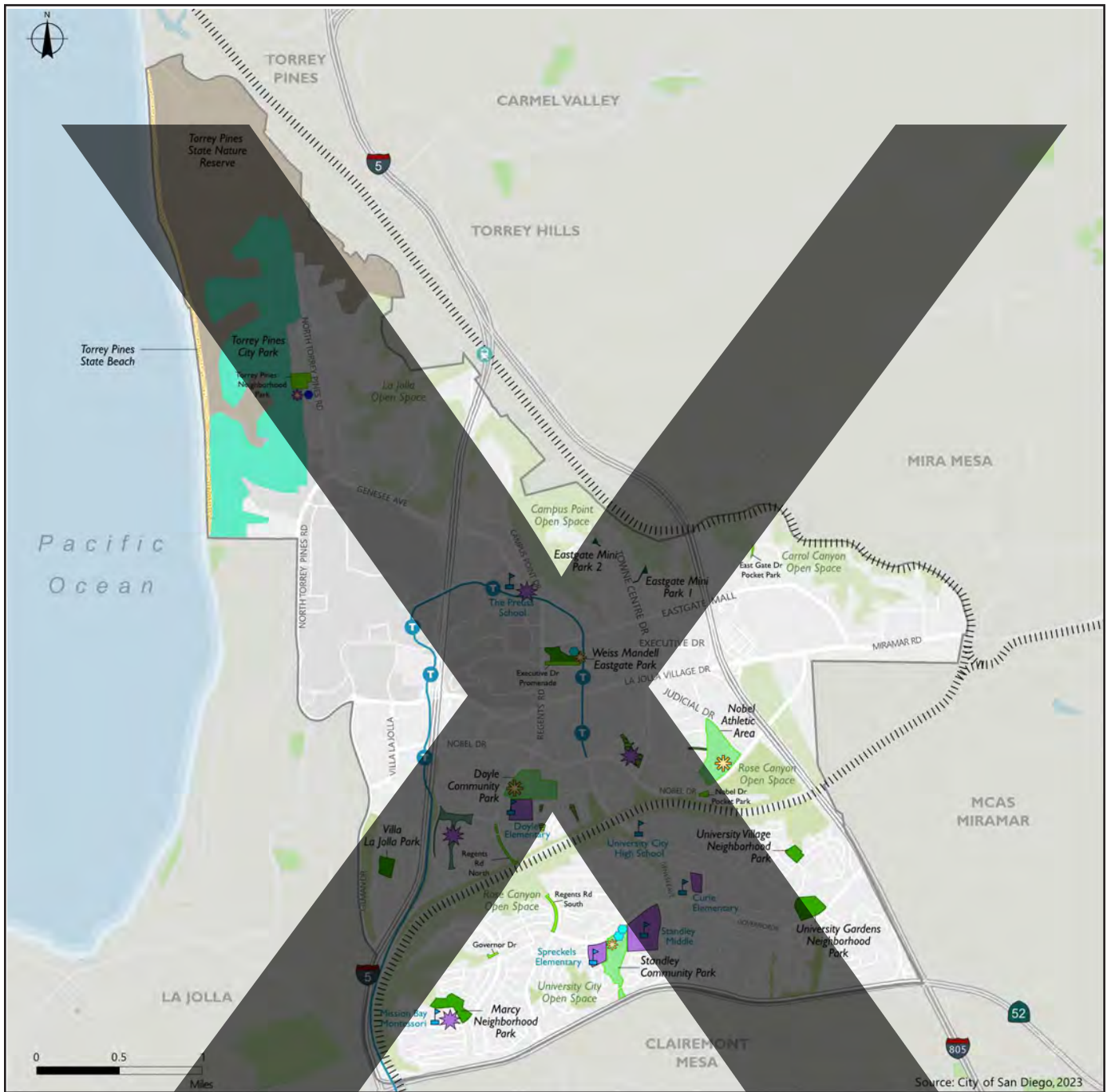


FIGURE 3-25  
University Existing and Proposed Parks

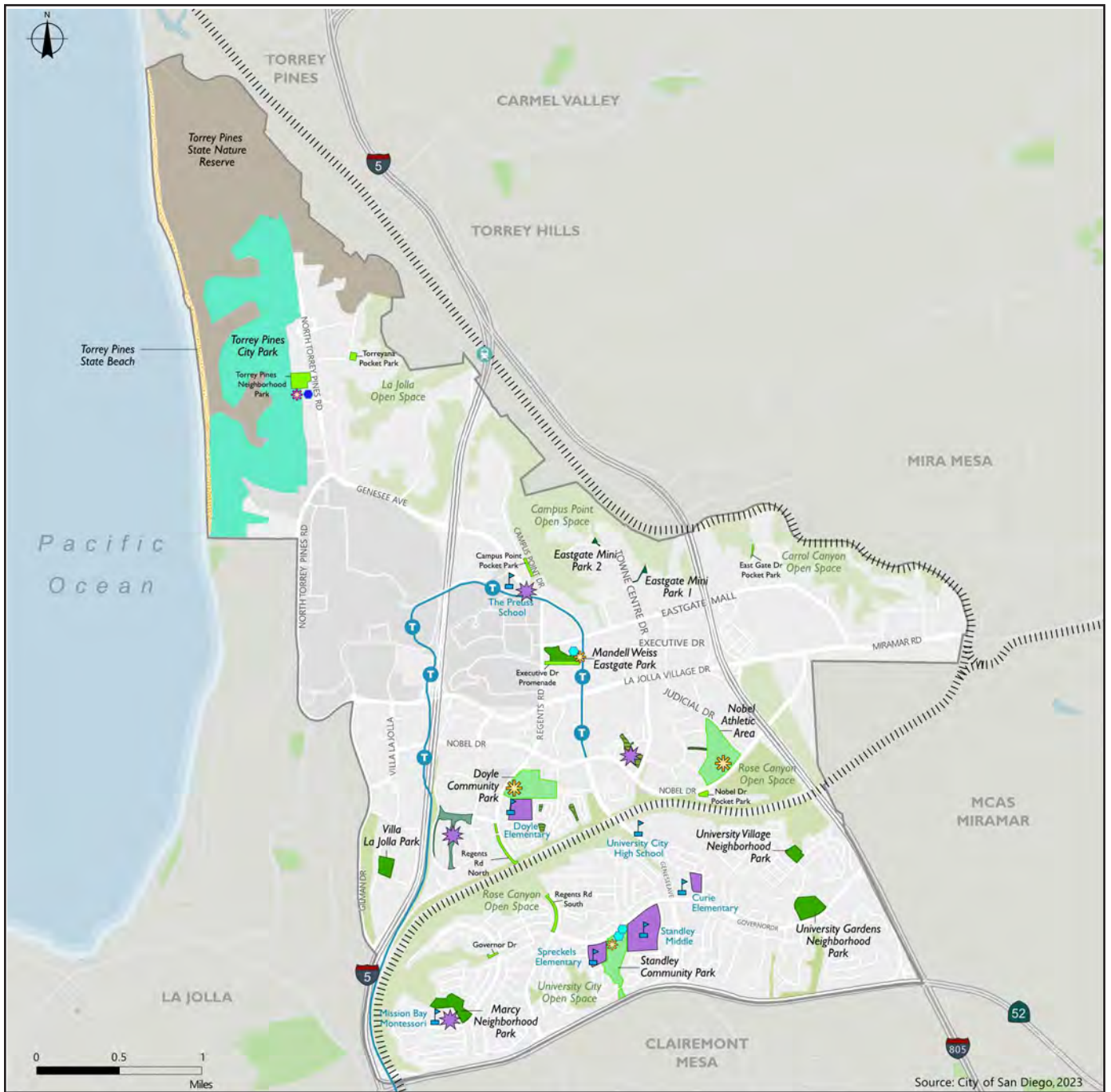


FIGURE 3-25  
University Existing and Proposed Parks



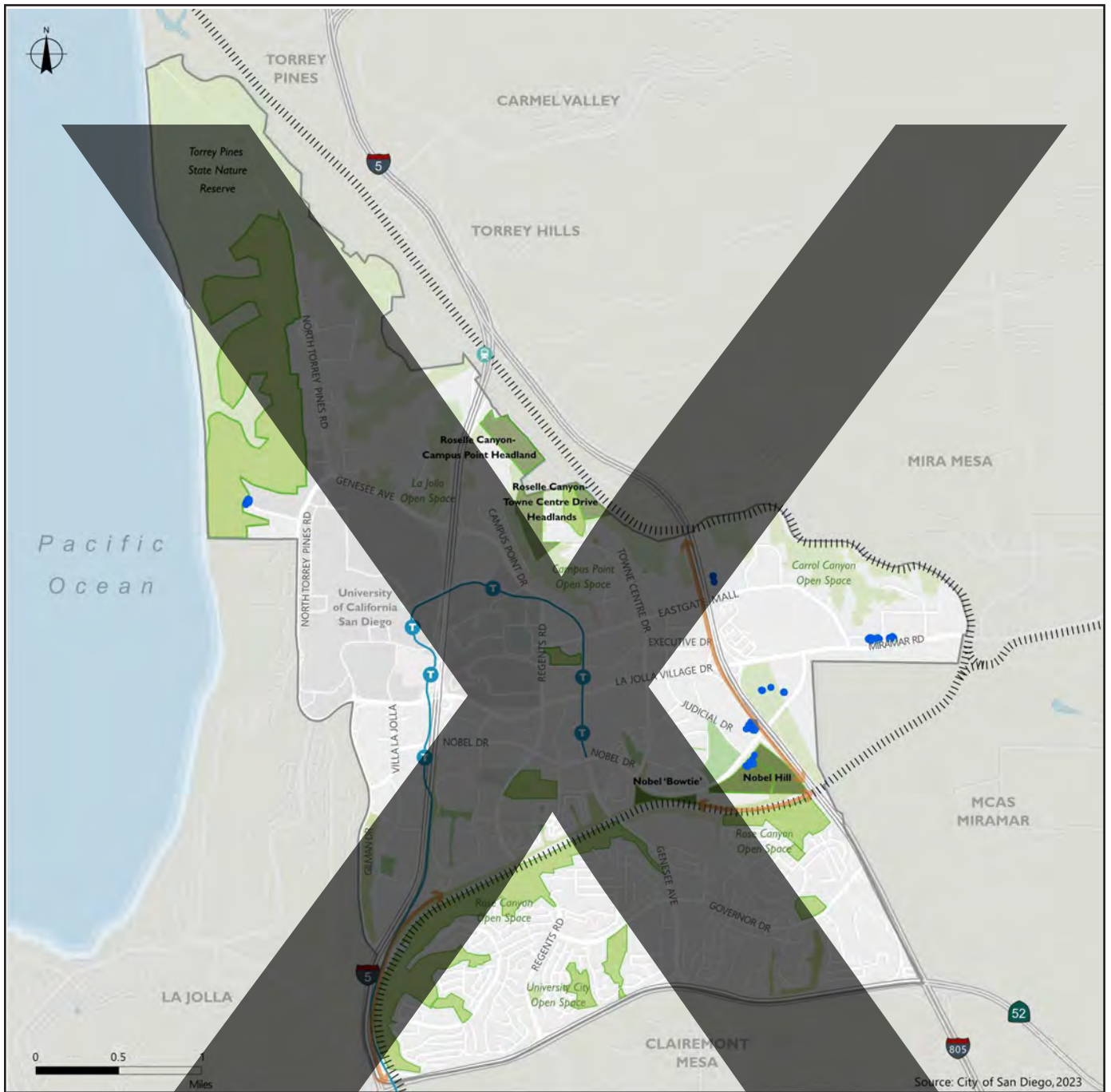


FIGURE 3-26  
Trails and Overlooks



- Possible Overlook
- ➔ Existing Trailhead
- Future Parks and Recreational Amenities
- ⋯ Existing Formal Trail
- Publicly Accessible Shoreline

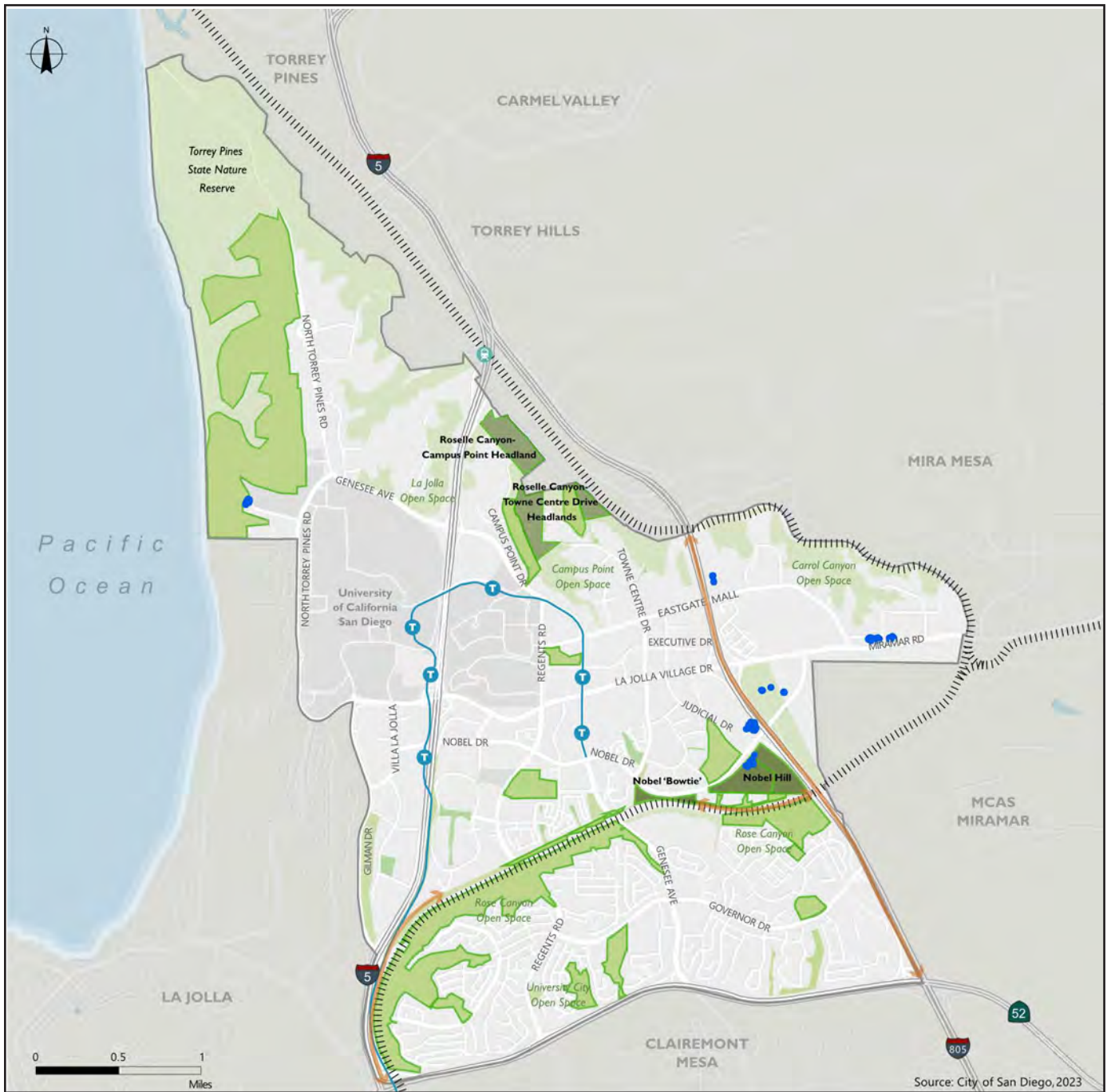
FIGURE 3-26  
University Existing Trails



- Parks
- Designated Open Space
- Dedicated Open Space
- Dedicated Open Space (proposed subject to City Council action)
- Vernal Pools
- MSCP Core Biological Resource Area Corridor

**FIGURE 3-27**  
Open Space to be Dedicated Pursuant to Charter 55





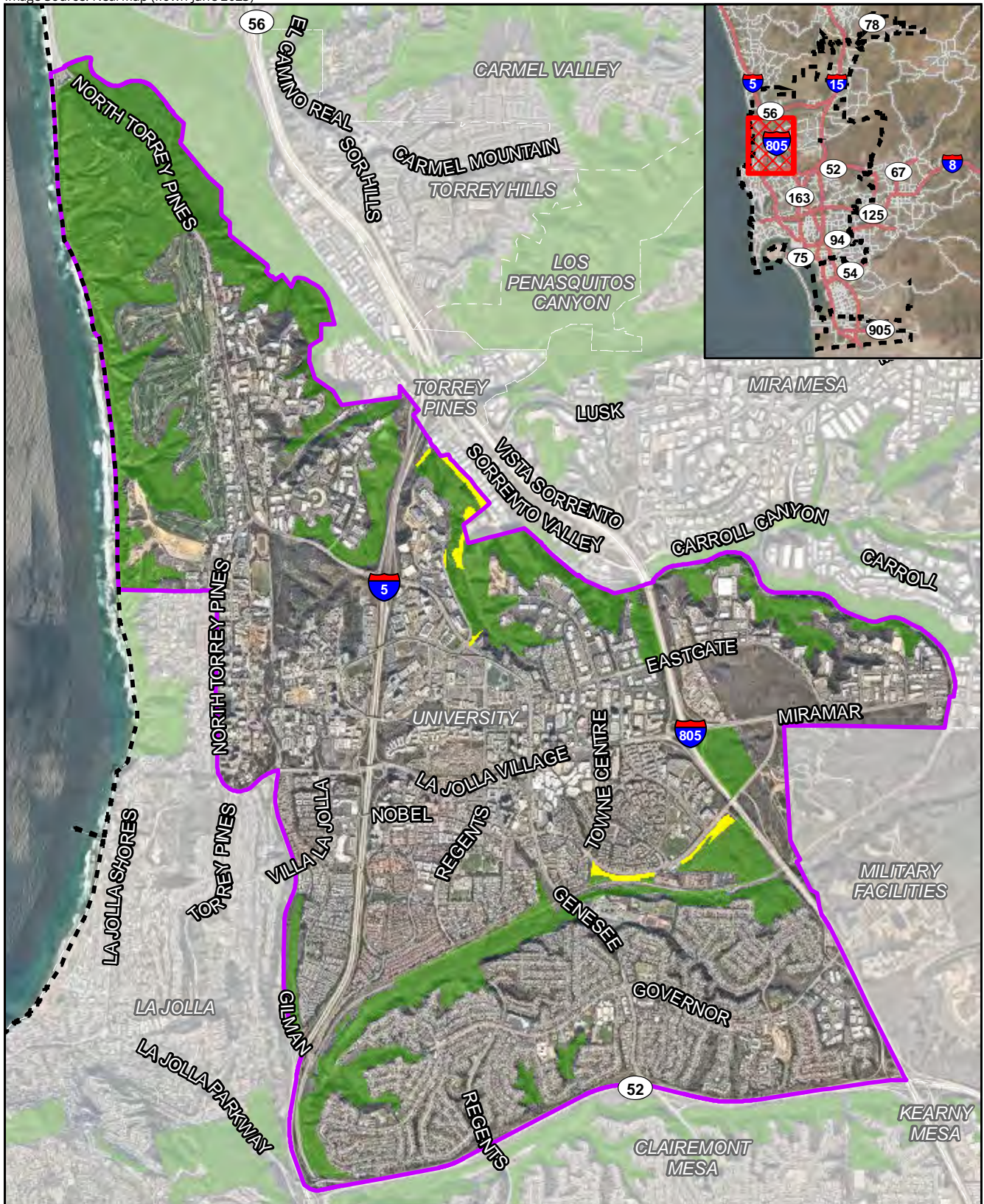
Source: City of San Diego, 2023

- Parks
- Designated Open Space
- Dedicated Open Space/Park Land
- Dedicated Open Space (proposed subject to City Council action)
- Vernal Pools
- MSCP Core Biological Resource Area Corridor

Note: Map illustrates generalized wildlife movement corridor for habitat adjacent to the I-805 freeway

**FIGURE 3-27**  
Open Space to be Dedicated Pursuant to Charter 55





- University Community Plan Update Area
- San Diego City Limits
- City of San Diego MHPA  
(Multi-Habitat Planning Area)
- MHPA Additions



**FIGURE 3-28**  
University Community Plan Update Area  
Multi-Habitat Planning Area Additions

The Open Space and Conservation chapter includes the following goals:

- Preservation and enhancement of biologically diverse ecosystems and improved viability of endangered, threatened, and sensitive species and their habitats.
- Preservation and enhancement of wetland resources, including estuarine and coastal waters, creeks, bays, riparian wetlands, and vernal pools, to provide ecosystem functions and services, wildlife habitat, water quality improvement, carbon sequestration, and resilience to climate change.
- Protection, enhancement, and long-term management of an open space system that preserves canyonlands, habitat, and sensitive biological resources.
- Development patterns that preserve natural landforms, public and private open spaces, wildlife linkages, sensitive species and habitats, watersheds, and natural drainage systems, and that contribute to clean air and clean water and help the City meet its climate action goals.
- Sustainable design that reduces GHG emissions and dependency on non-renewable energy sources, makes efficient use of resources, and incorporates sustainable landscaping, water use, and stormwater management.
- Opportunities for compatible public access to open space, including portions of the MHPA, through low impact passive recreation, scenic overlooks, environmental education, and research.

## **f. Historic Preservation**

The Historic Preservation chapter of the University CPU provides a summary of the prehistory and history of the University plan area. The Historic Preservation chapter is guided by the General Plan for the preservation, protection, restoration, and rehabilitation of historical, archaeological, and tribal cultural resources throughout the plan area.

The Historic Preservation chapter includes the following goals:

- Identification and preservation of significant historical resources in the University community.
- Provision of educational opportunities and incentives related to historical resources.

A University Community Plan Historic Context Statement (Appendix B) and Focused Reconnaissance Survey (Appendix C) were prepared for the University CPU. The Focused Reconnaissance Survey evaluated master-planned residential communities representative of common tract style housing with repetitive house models and other features indicative of a master development plan. The survey addressed these communities from a district perspective rather than as individual properties because tract style homes typically do not have the ability to rise to a level of individual significance under most designation criteria. The purpose of the Historic Context Statement and Reconnaissance



Survey was to determine which residential communities would require future study to determine eligibility for historic district designation, and which communities would not. Based on the results of the Historic Context Statement and Focused Reconnaissance Survey, revisions to the City's Historical Resources Guidelines are proposed to exempt specified areas within the University community from historic review under SDMC Section 143.0212. The study found that the following master-planned communities within the plan area have the potential for historical significance including La Jolla Colony, University Hyde Park, San Clemente Park Estates, University City West A, and University City West B. These communities are identified as Tier I communities and are depicted on Figure 3-29 and would require further study to determine historic significance consistent with SDMC Section 143.0212. The proposed amendment to the Historical Resources Guidelines of the City's Land Development Manual would exempt all remaining non-Tier I master-planned communities depicted on Figure 3-29 from potential historic review under SDMC Section 143.0212.

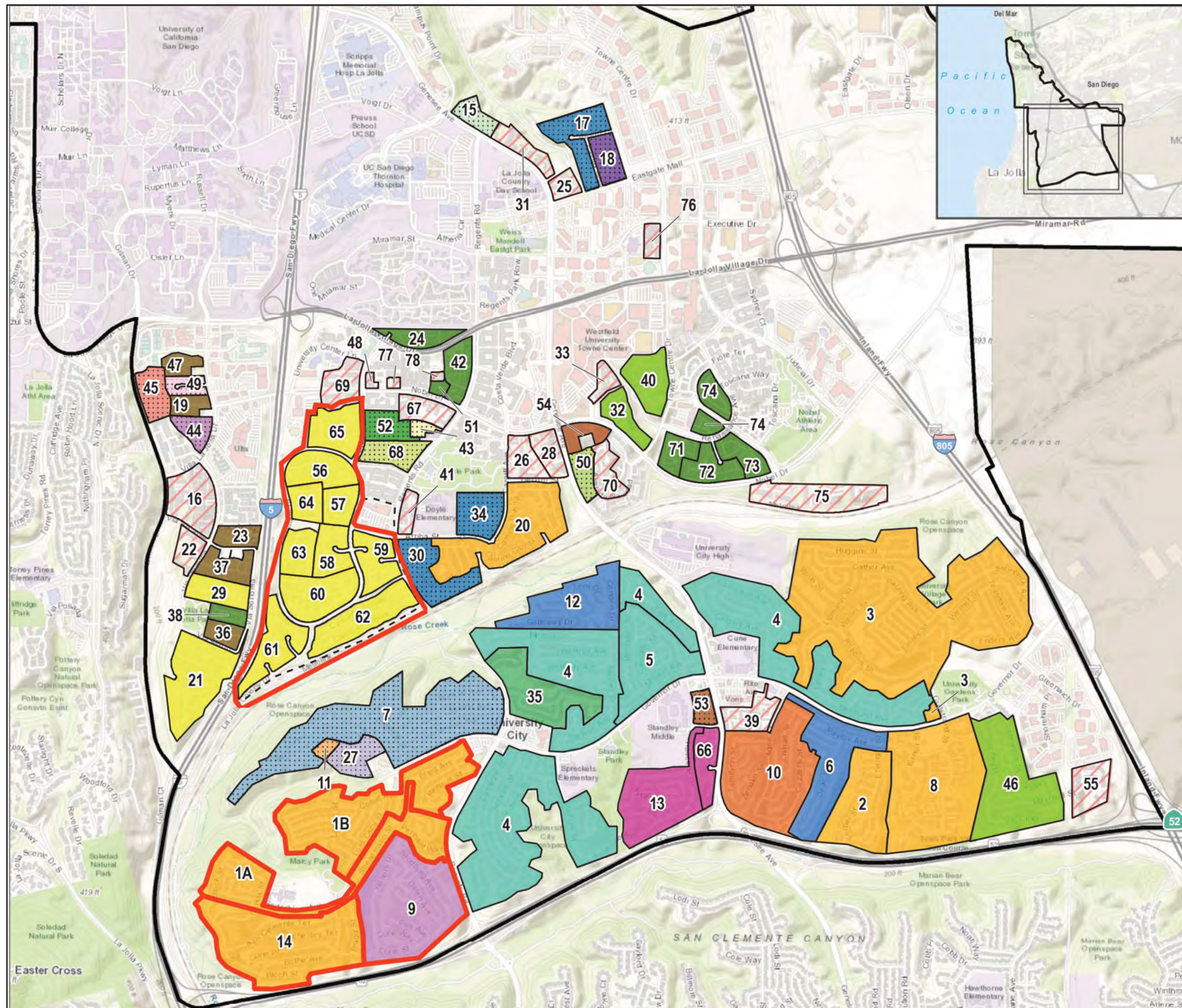
### **g. Public Facilities, Services, and Safety**

The Public Facilities, Services, and Safety chapter of the University CPU illustrates existing and planned public facilities in the plan area. The Public Facilities, Services, and Safety chapter identifies existing and potential public, semi-public, and community facilities and services, public utilities, and safety considerations. Strategies to address the impacts of climate change and increase the area's resilience are also identified, such as developing a "resilience hub" to provide community serving facilities to provide support and resources to community members before, during, and after a climate hazard or natural hazard event. promotes remediating former industrial sites to provide an opportunity to develop parks, plazas, or open space. The chapter also identifies that the plan area could designate and develop a "resilience hub." Resilience hubs are community serving facilities that provide support and resources to community members before, during, and after a climate hazard or natural hazard event.

The Public Facilities, Services, and Safety chapter includes the following goals:

- A community well-served by public facilities that promote neighborhood health, safety, and livability.
- A system of public facilities that are accessible by transit, located near or within mixed-use development, are technologically equipped, and environmentally sustainable.
- A healthy, safe, and livable community that reduces the risk posed by fire, flooding, hazardous materials, geologic and seismic hazards, and extreme temperatures.





- University Community Plan Area Boundary
- Notable Developer**
- American Housing Guild
- Bren Company
- Fireside Homes
- Harry L. Summers
- Lear Land Corporation
- Lion Property Company
- McKellar Development Corporation
- Penasquitos Inc. (Irvin J. Kahn and Associates)
- Ray Hommes Company
- Tech Bill Company
- The Douglas Allred Company
- Time Development Company
- Other Developer**
- Angelucci Enterprises
- Baldwin Company
- Broadmoor Homes
- Dass Construction Company
- Diamond Enterprises
- Ernest Hahn
- The Luckey Co.
- Heritage West Development Company
- M. David Kelly Development Company
- Marsco Development Corporation
- Medici Equities
- Playmor
- Real Investments Corporation
- Remmco Associates
- Unknown Developer**
- La Jolla Colony
- Tier 1 Communities Recommended for Additional Study

**Master-Planned Communities**

- |  |  |
|--|--|
| 1. University City West B (1960)                         | 40. Vista La Jolla Townhomes (1979)        |
| 2. University City West A (1960)                         | 41. Dieguenos (1979)                       |
| 3. Pennant Village (1961)                                | 42. La Jolla Village Park (1979)           |
| 4. University Village (1961-1969)                        | 43. The Pines (1979)                       |
| 5. University Hills (1962-1971)                          | 44. Villa Mallorca (1980)                  |
| 6. Panorama Park (1962)                                  | 45. La Jolla Terrace (1980)                |
| 7. Flair (1963)  | 46. Canyon Ridge (1980-1984)               |
| 8. University City Manor (1964)                          | 47. Boardwalk (1981)                       |
| 9. University City Village (Leisure Life Village) (1965) | 48. La Jolla Gardens (1981)                |
| 10. University Hyde Park (1967)                          | 49. Cambridge (1982)                       |
| 11. Freesia University City Homes (1967)                 | 50. La Jolla City Club (1982)              |
| 12. Diamond Manor (1967-68)                              | 51. Villa Europa (1982)                    |
| 13. The Bluffs (1968)                                    | 52. La Jolla International Gardens (1982)  |
| 14. University Park North (1968)                         | 53. Regency Villas (1983)                  |
| 15. San Clemente Park Estates (1970)                     | 54. University Towne Square (1985)         |
| 16. La Jolla Vista (1971)                                | 55. Star Village (1985)                    |
| 17. La Jolla Village Apartments (1972)                   | 56. Verano (1985-1987)                     |
| 18. Genesee Vista (1973)                                 | 57. Marbella (1985-1987)                   |
| 19. La Jolla Mesa (1974)                                 | 58. Madrid (1985-1987)                     |
| 20. Woodlands North (1974)                               | 59. Las Palmas (1985-1987)                 |
| 21. Genesee Highlands (1974)                             | 60. Barcelona (1985-1987)                  |
| 22. SouthPointe (1974-1979)                              | 61. La Paz (1985-1987)                     |
| 23. Villa Toscana (1975)                                 | 62. Valencia (1985-1987)                   |
| 24. Woodlands La Jolla (1975)                            | 63. Avaran La Jolla Apartments (1985-1987) |
| 25. La Jolla Village Tennis Club (1976)                  | 64. Avalon La Jolla Colony (1985-1987)     |
| 26. La Jolla Canyon (1976)                               | 65. Mirada at La Jolla Colony (1985-1987)  |
| 27. La Jolla Terrace (1976)                              | 66. Villas at University Park (1987)       |
| 28. West Hills Homes (1976)                              | 67. The Venetian (1987)                    |
| 29. Pacific Gardens Apartments (1976)                    | 68. La Jolla del Sol (1987)                |
| 30. EastBluff (1977)                                     | 69. Villa Vicenza (1988)                   |
| 31. Playmor Terrace West (1977)                          | 70. Cambridge Terrace (1989)               |
| 32. Canyon Park Apartments (1977)                        | 71. La Florentine (1990)                   |
| 33. Vista La Jolla (1977)                                | 72. Avanti (1990)                          |
| 34. Torrey Pines Village Apartments (1978)               | 73. Capri (1990)                           |
| 35. Playmor Terrace (1978)                               | 74. Casabella (1990)                       |
| 36. Topeka Vale (1978)                                   | 75. Casabella (1990)                       |
| 37. Woodlands South (1978)                               | 76. Lucera (1990)                          |
| 38. Woodlands West I and II (1978)                       | 77. Devonshire Woods (1990)                |
| 39. La Jolla Park Villas (1978)                          | 78. Pacific Regents (1990)                 |
| 40. The Park (1978)                                      | 79. Park Place (1990)                      |

FIGURE 3-29

University Community Plan Area Tier I Master-Planned Communities



## h. Implementation

The Implementation chapter of the University CPU includes policies which provide specific direction, practice, guidance, and directives to support and implement the University CPU's land use, mobility, urban design, parks, and public facilities goals. These policies, combined with the zoning regulations in the LDC, provide a policy and regulatory framework to guide development within the CPU area, and will be used by City staff and decision-makers to assess if a development is consistent with the University CPU.

The Implementation chapter also proposes a CPIOZ ~~Type A~~ which would be applied within the boundaries of the CPU area per SDMC Chapter 13, Article 2, Division 14, as shown on Figure 3-30, and includes SDRs that are tailored to implement the vision and policies of the University CPU. The University CPU includes general SDRs, which are applicable to all projects within the CPIOZ area as shown on Figure 3-30, and area-specific SDRs, which are to be implemented by projects according to the CPIOZ sub-areas as depicted in Figure 3-30. The CPIOZ includes SDR-A.1 through SDR-A.45, which provide development regulations for public spaces in the CPIOZ area. SDR-A.1 and SDR-A.2 provide regulations regarding the provision of public spaces and associated amenities and their design and access requirements. SDR-A.3 provides specific design requirements for the provision of a promenade along Executive Drive. SDR-A.4 and SDR-A.5 details when an exemption to the requirement to provide public spaces under SDR-A.1 applies and provides regulations regarding the Public Space In Lieu Fee Option.

The CPIOZ also includes SDRs related to pedestrian connectivity (SDR-B.1), building transitions for residential development (SDR-C.1), building transitions for open space areas (SDR-C.2), parking structure screening (SDR-D.1), urban parkway street trees (SDR-E.1), pedestrian improvements to create an urban pathway connection through the Costa Verde area to the UTC Transit Center (SDR-F.1), pedestrian improvements for at-grade crossings or overcrossings (SDR-F.2), complete streets (SDR-G.2), the provision of community serving retail within developments that have a residential use that are located on property designated as community village in the University CPU (SDR-H.1 and SDR-H.2), the requirement to not have exterior common open space within 30-feet from the property line abutting a freeway right of way (SDR I.1), the provision of affordable housing in a proposed residential or mixed-use development (SDR-J.1).

### 3.5.3.2 Local Coastal Program Amendment

Portions of the University CPU area within the Coastal Zone are subject to the California Coastal Act. The California Coastal Act requires all jurisdictions within the Coastal Zone to prepare a Local Coastal Program (LCP), which includes issue identification, a land use plan, and implementation (zoning) ordinances. Actions associated with the University CPU within the Coastal Zone would require a future California Coastal Commission action to approve an amended LCP that integrates the University CPU actions.

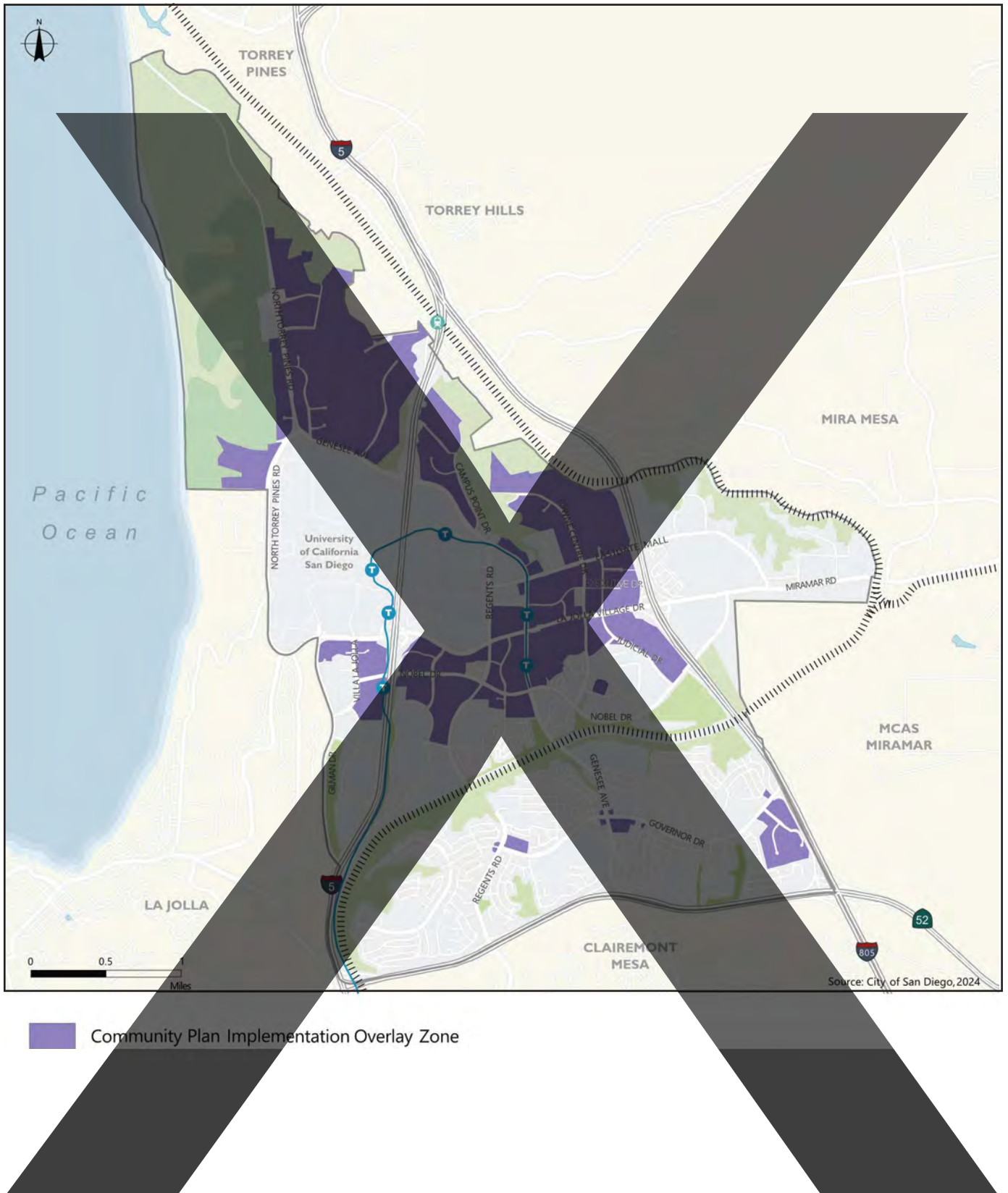
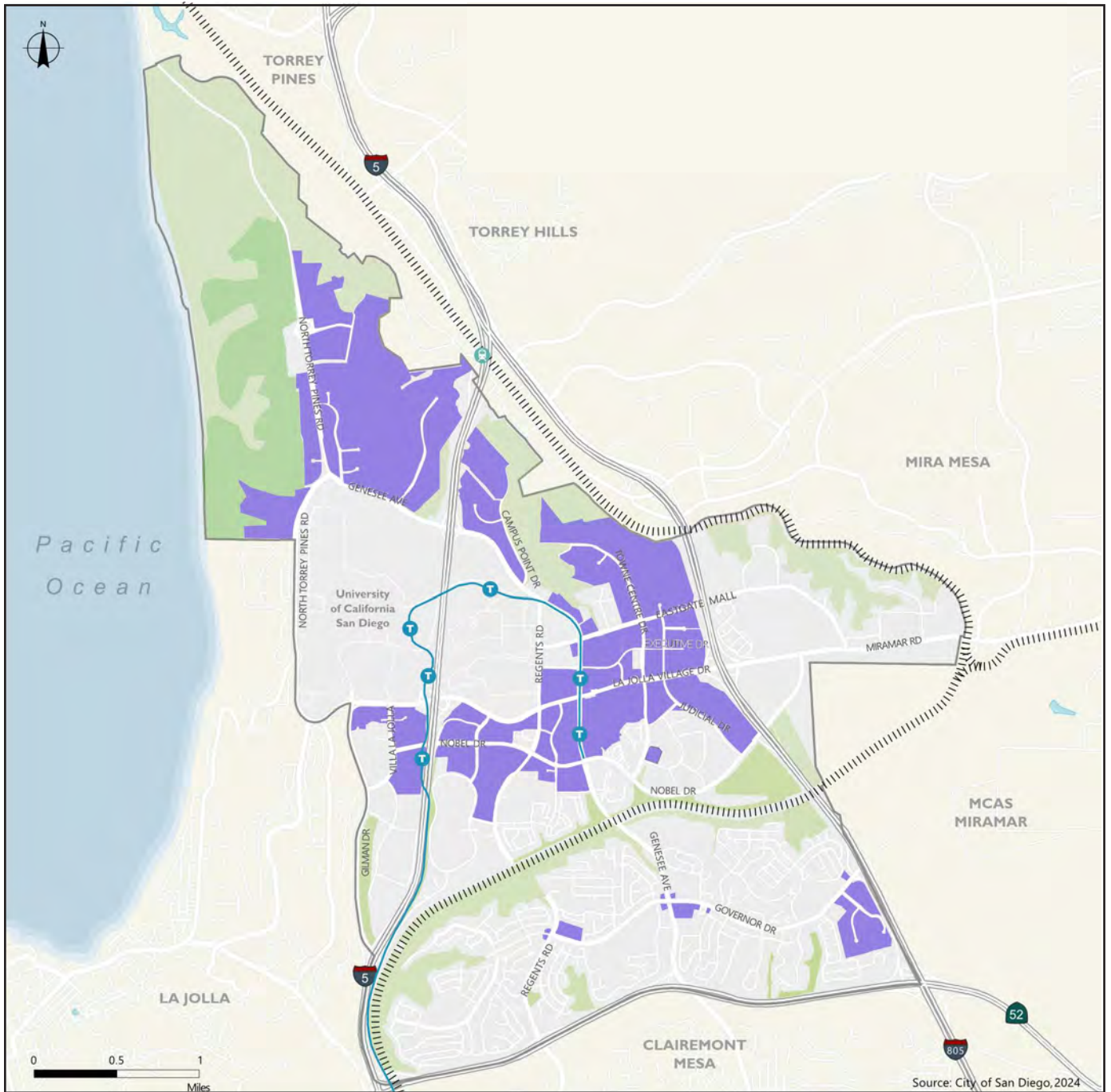


FIGURE 3-30  
 University Community Plan Implementation Overlay Zone



Community Plan Implementation Overlay Zone

**FIGURE 3-30**  
University Community Plan Implementation Overlay Zone

## 3.6 Discretionary Actions

### 3.6.1 Blueprint SD Initiative

Adoption of an amendment to the General Plan to incorporate the changes addressed in the Blueprint SD Initiative as part of the General Plan Refresh would require approval of the following discretionary actions:

- Adopt a resolution certifying the PEIR for the General Plan Amendment, the University CPU, and the Hillcrest FPA and adopting the Findings, Statement of Overriding Considerations, and Mitigation, Monitoring and Reporting Program.
- Adopt an amendment to the General Plan.

### 3.6.2 Hillcrest Focused Plan Amendment

Adoption of an amendment to the Uptown Community Plan to incorporate the changes addressed in the Hillcrest FPA would require approval of the following discretionary actions:

- Adopt a resolution adopting the Hillcrest ~~FPA Focused Plan Amendment~~ to the Uptown Community Plan.
- Adopt an amendment to the General Plan land use map consistent with the Hillcrest ~~FPA Focused Plan Amendment~~ to the Uptown Community Plan.
- Adopt an ordinance rezoning land within the Uptown Community consistent with the Hillcrest ~~FPA Focused Plan Amendment~~ to the Uptown Community Plan.
- Adopt an ordinance amending SDMC Section 131.1402, 131.1403, Table 132-14A, and Diagram 132-14K to include the revised Community Plan Implementation Overlay Zone within the Uptown Community.
- Adopt an ordinance amending SDMC Sections 131.0507, 131.0522, 131.0531, 131.0540, 131.0543, Table 131-05B, and Table 131-05E to add new Commercial Community base zones (CC-3-10 and CC-3-11) to implement the corresponding land use designations in the Hillcrest ~~FPA Focused Plan Amendment~~ to the Uptown Community Plan.
- Adopt a resolution designating the LGBTQ+ Cultural District
- ~~Adopt a resolution designating the LGBTQ+ Cultural District.~~

### 3.6.3 University Community Plan Update

Adoption of the University CPU would require approval of the following discretionary actions:

- Adopt a resolution adopting a comprehensive update to the University Community Plan and LCP.
- Adopt an amendment to the General Plan land use map consistent with the University Community Plan.
- Adopt an ordinance rezoning land within the University CPU area consistent with the updated Community Plan.
- Adopt an ordinance amending SDMC Sections 132.1402 and 132.1403 to revise the CPIOZ within the University CPU area.
- Adopt a resolution establishing an alternative fee option for public spaces.
- Adopt an ordinance dedicating public open space within the University CPU area pursuant to City Charter Section 55.
- Adopt ~~a resolution~~ a resolution ~~an ordinance~~ amending the Historical Resources Guidelines of the Land Development Manual to exempt specified areas within the University CPU area from historic review under SDMC Section 143.0212.
- Adopt ~~a resolution~~ a resolution ~~an ordinance~~ rescinding the Nexus Technology Centre Specific Plan.
- California Coastal Commission certification of the Update to the University Community Plan and LCP.

## 3.7 Future Actions

The Blueprint SD Initiative, which includes a General Plan refresh and an update to the General Plan's Village Propensity Map (General Plan Figure LU-1), among other actions, seeks to encourage and identify opportunities for future mixed-use and higher-density residential development throughout the City and especially within the Climate Smart Village Areas. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, impacts associated with future development are more likely to be concentrated in these areas. The Blueprint SD Initiative, the Hillcrest FPA, and the University CPU do not include site-specific development proposals, and therefore, site-specific environmental analysis of future development anticipated within the City is not included within this PEIR. However, the PEIR anticipates future growth would occur consistent with the Blueprint SD Initiative, Hillcrest FPA, and University CPU. The PEIR analysis establishes a framework to allow for site specific analysis and evaluation consistent with the City's existing regulatory framework and proposed mitigation framework. Future development within the scope of this PEIR would be subject to subsequent ministerial and discretionary reviews in accordance with

the City's zoning and development regulations, General Plan, Community Plan policies, and would be reviewed for consistency with this PEIR. The locations and details of project-specific developments are unknown at this time; however, the PEIR analysis anticipates growth throughout the City and identifies a mitigation framework that could be applied to future actions, where appropriate.

Future development would be subject to further environmental review to determine if actions are within the scope of this PEIR. Future actions would require compliance with applicable local, state, and federal policies, guidelines, directives, regulations, and implementation of the mitigation framework contained in this PEIR at the time the development is proposed.

The City is the lead agency for purposes of CEQA. Within certain project areas, California Coastal Commission approvals may be required to implement development proposals. A non-exhaustive list of potential future approvals that could be required to implement the Blueprint SD Initiative, Hillcrest FPA, and the University CPU are listed in Table 3-68.

<b>Table 3-68</b> <b>Potential Future Approvals Required to Implement the Project</b>
<p><b>City of San Diego</b></p> <ul style="list-style-type: none"> <li>Amendments to the San Diego Municipal Code, including the Land Development Code</li> <li>Coastal Development Permits</li> <li>Community Plan Updates and Amendments</li> <li>Specific Plans</li> <li>Focused Plan Amendments</li> <li>Development Permits</li> <li>Street and other easement Vacations, Release of Irrevocable Offers of Dedication, and Dedications</li> <li>Water and Sewer Infrastructure and Road Improvements</li> <li>Building and Construction Permits</li> <li>Adoption of fees to implement neighborhood supportive infrastructure</li> <li>Approval of additional density through City and state density bonus allowances</li> <li><u>Designation of the Hillcrest Historic District by the Historical Resources Board</u></li> </ul> <p><b>State of California</b></p> <ul style="list-style-type: none"> <li>California Department of Transportation Encroachment Permits</li> <li>California Department of Fish and Wildlife Permits</li> <li>California Coastal Commission Coastal Development Permits</li> <li>Water Quality Certification Determinations for Compliance with Section 401 of the Clean Water Act</li> </ul> <p><b>Federal Government</b></p> <ul style="list-style-type: none"> <li>U.S. Army Corps of Engineers Section 404 Permits</li> <li>U.S. Fish and Wildlife Service Section 7 or 10(a) Permits</li> </ul> <p><b>Other</b></p> <ul style="list-style-type: none"> <li>Federal Aviation Administration</li> <li>Airport Land Use Commission for San Diego County</li> <li>San Diego Gas &amp; Electric/Public Utilities Commission approvals of power line relocations or undergrounding</li> </ul>



## Chapter 4.0

# Environmental Analysis

Chapter 4.0, Environmental Analysis discloses the potential environmental impacts resulting from the implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the ~~Land Development Code~~LDC, and associated discretionary actions.

Throughout the environmental analysis in Chapter 4.0, implementation of the planning level actions is addressed, in addition to the potential future plan and LDC amendments, and future individual development projects that may be implemented consistent with relevant plans. While a project-level analysis is not possible for all future development anticipated by the project, this Program Environmental Impact Report (PEIR) identifies the analysis framework that would be implemented for future development. Where existing City plans, policies, and regulations would be sufficient to ensure adverse impacts of development are reduced to less than significant, these various plans, policies, and regulations are discussed to outline the analysis framework that would be applied to future development. Where necessary, this PEIR includes mitigation frameworks that would need to be applied to further reduce potentially significant impacts beyond existing regulations or policies. The project anticipates future Community Plan Updates, Specific Plans, and Focused Plan Amendments and LDC amendments would be implemented for consistency with the Blueprint SD Initiative, which includes a comprehensive amendment to the General Plan, (referred to as the “General Plan Refresh”) and the Village Climate Goal Propensity Map. See also Section 1.2 of this PEIR for a discussion of future tiering anticipated under this PEIR. There are 18 environmental impact areas addressed in the following sections. The environmental topics addressed in individual sections of this chapter include the following:

- 4.1 Aesthetics
- 4.2 Air Quality
- 4.3 Biological Resources
- 4.4 Cultural Resources
- 4.5 Energy
- 4.6 Geology and Soils
- 4.7 Greenhouse Gas Emissions
- 4.8 Hazards and Hazardous Materials
- 4.9 Hydrology

- 4.10 Land Use and Planning
- 4.11 Noise
- 4.12 Public Services
- 4.13 Recreation
- 4.14 Transportation
- 4.15 Tribal Cultural Resources
- 4.16 Utilities and Service Systems
- 4.17 Water Quality
- 4.18 Wildfire

Each section is formatted to address the environmental setting, regulatory framework, a description of the methodology and assumptions used in the analysis, if applicable, the criteria for determining significance for each impact, an evaluation of potential impacts, an assessment of the level of significance for each impact, a mitigation framework, if applicable, and a conclusion of significance after mitigation for impacts identified as significant. The goals, policies, and implementation programs of the project relevant to potential impacts are also documented.

## 4.1 Aesthetics

This section analyzes the potential for significant impacts as it relates to aesthetics that could result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (CPU) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

The analysis in this section is based on the project’s consistency with relevant design policies and regulations, including the City’s General Plan and LDC, applicable design guidelines and policies of relevant plans, and Supplemental Development Regulations (SDRs) applicable to certain areas.

### 4.1.1 Existing Conditions

#### 4.1.1.1 Physical Setting

##### a. Blueprint SD Initiative

The City is located within San Diego County in the southwestern corner of California. San Diego County is bordered by Riverside County to the north, Orange County at the northwest corner, Imperial County to the east, the Republic of Mexico to the south, and the Pacific Ocean on the west. As depicted in Figure 2-1, the City covers approximately 342.5 square miles and stretches nearly 40 miles from north to south. There are approximately 93 miles of shorelines including bays, lagoons, and the Pacific Ocean. Elevations mostly range from sea level to approximately 1,600 feet above sea level. High points include Mount Soledad in La Jolla and Cowles Mountain in the eastern part of the City, which is nearly 1,600 feet high.

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative’s Climate Smart Village Areas, which are areas that have good access to homes, jobs, and mixed-use destinations and that are in proximity to available high-frequency transit services, have transit access to job centers, and have good connections between transit and destinations. The Blueprint SD Initiative’s policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless,

it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, impacts associated with future development are more likely to be concentrated in these areas. The Blueprint SD Initiative's Climate Smart Village Areas, where future increases in development intensities are anticipated to be focused, are located throughout the City.

## **b. Hillcrest Focused Plan Amendment**

The Uptown Community Plan area, where the Hillcrest FPA area is located, contains some of the oldest and most distinct neighborhoods in San Diego consisting of Hillcrest, Mission Hills, Bankers Hill/Park West, University Heights, Middletown, and the Medical Complex. The Uptown Community Plan area is located just north of Downtown San Diego. It is bounded on the north by the steep hillsides of Mission Valley, on the east by Park Boulevard and Balboa Park, and on the west and south by Old Town San Diego and Interstate (I) 5. The Uptown Community Plan area comprises about 2,700 acres or approximately 4.2 square miles. The Uptown community's topography generally consists of a level mesa that is segmented by canyons.

As shown in Figure 2-3, the Hillcrest FPA area is in the central portion of the Uptown Community Plan area and encompasses approximately 380 acres of the Hillcrest and Medical Complex neighborhoods. The Hillcrest FPA area sits on a high mesa and its landform and topography is relatively flat, except for the steep topography of the canyons to the north which extend into the Hillcrest FPA area around the Medical Complex. State Route (SR-) 163 runs in a ravine that splits the Hillcrest FPA area into two sides, east and west Hillcrest, with three connecting streets: Washington Street and University and Robinson avenues. The Hillcrest FPA area is bounded by a series of streets and canyons, including Park Boulevard to the west, Walnut Avenue to the south, Dove Street to the west, and hilltop bluffs along the northern edge of the Medical Complex neighborhood. The primary commercial core of the Hillcrest FPA area is concentrated around the intersection of Fifth and University avenues and extends several blocks east, west, and south.

## **c. University Community Plan Update**

The University CPU area encompasses approximately 8,700 acres. It is bounded by the Los Peñasquitos Lagoon and the edge of the east-facing slopes of Sorrento Valley on the north; the tracks of the Atchison, Topeka, and Santa Fe Railroad, Marine Corps Air Station Miramar and I-805 on the east; SR-52 on the south; and I-5, Gilman Drive, North Torrey Pines Road, La Jolla Farms, and the Pacific Ocean on the west. Neighboring communities include Torrey Pines to the north, Mira Mesa to the east, Clairemont Mesa to the south, and La Jolla to the west. There are two state-controlled properties in the area—the University of California, San Diego (UCSD) and Torrey Pines State Natural Reserve—which lie outside the land use jurisdiction of the City.

### **4.1.1.2 Structure and Built Form**

#### **a. Blueprint SD Initiative**

The City contains a robust system of transportation networks which include major arterial freeways, highways, surface streets, and public transportation routes. Available modes of public

transportation include buses and regional light rail trains that link the City with other municipalities in the county. The City is also connected to the larger statewide and national transportation networks through established train lines and interstate freeways. Proximity to Mexico and the presence of the federal ports of entry connect the City to the international arena as well.

The City's built environment spans over 200 years of architectural history. The urbanization of the City as it is today began in 1869 when Alonzo Horton moved the center of commerce and government from Old Town (Old San Diego) to New Town (Downtown). Development spread from Downtown based on a variety of factors, including the availability of potable water and transportation corridors. Factors such as views and access to public facilities affected land values, which in turn affected how certain neighborhoods developed.

Many of the City's neighborhoods are the product of small incremental parcelizations and development over a long period of time. The built environment includes buildings and streets, and the natural environment includes features such as shorelines, canyons, mesas, and parks as they shape and are incorporated into the urban framework. Among the recognized architectural styles in San Diego are Spanish Colonial, Pre-Railroad New England, National Vernacular, Victorian Italianate, Stick, Queen Anne, Colonial Revival, Neoclassical, Shingle, Folk Victorian, Mission, Craftsman, Monterey Revival, Italian Renaissance, Spanish Eclectic, Egyptian Revival, Tudor Revival, Modernistic and International. Examples of every major period and style remain, although few areas retain neighborhood-level architectural integrity due to several major building booms when older structures were demolished prior to preservation movements and stricter regulations regarding historic structures (City of San Diego 2008).

## **b. Hillcrest Focused Plan Amendment**

The Hillcrest FPA area contains a diverse mix of retail, commercial, office, mixed-use, residential, and institutional land uses. The Hillcrest FPA area includes the primary commercial core of Uptown, which is concentrated around the intersection of Fifth Avenue and University Avenue, and extends several blocks east, west, and south. This area is also marked by the iconic Hillcrest gateway sign, at University and Fifth avenues, serving as a key neighborhood landmark. This area is a vibrant pedestrian-oriented commercial center, as well as the center of community-wide activity with active, walkable streets, mixed-use buildings and retail, office, and entertainment activities.

University Avenue is the primary core of Hillcrest, with commercial development extending along University Avenue east of SR-163, and west until it converges with the Mission Hills neighborhood. The eastern portion of University Avenue has an increased street width compared to surrounding streets, which has allowed for a more pedestrian-friendly environment with streetscape improvements and the development of a mixed-use Uptown District. Hillcrest is one of the more intensely developed neighborhoods in Uptown. The neighborhood includes a variety of multi-family residential and high-density mixed-use buildings. Hillcrest also has many office and retail uses in the community, particularly in the core retail district where building setbacks are not required. The area also includes high-rise buildings, all of which were developed to take advantage of views of either Balboa Park or the San Diego Bay.

Buildings in the Hillcrest FPA area include a range of architectural styles. Single-family residential clusters along First and Second avenues, and east of SR-163 and south of Robinson Avenue, include styles associated with early development, such as Craftsman, Bungalow, Prairie, and Mission and Spanish Revival. Infill development has introduced new architectural forms and styles, many of which try to complement the form, scale and stylistic precedents found within Hillcrest. Hillcrest is characterized by a street grid pattern that includes little variation in response to topography. The predominant block pattern consists of long rectangular blocks (approximately 300 feet by 600 feet) with a mid-block alley running the length of the block.

While retaining the same general dimensions, the blocks are oriented north-south along the avenues. They are rotated east-west along University Avenue and Robinson Avenue, and then northeast/southwest along Normal Street. Despite this grid pattern, Robinson Avenue, University Avenue and Washington Street are the only streets that provide contiguous east-west connections through Hillcrest, due to the divide created by SR-163 and the canyons. Hillcrest is the crossroads of Uptown, with major streets intersecting in Hillcrest's core. Normal Street represents a unique feature in the street system with its diagonal orientation and wide right-of-way.

The Medical Complex neighborhood sits atop a flat mesa north of Washington Street with canyons that descend to Mission Valley. Washington Street forms the boundary between Hillcrest and the Medical Complex neighborhood and marks the transition from Hillcrest's pedestrian-oriented retail district to the more automobile-oriented medical center uses. Buildings are noticeably taller in the Medical Complex neighborhood than they are in the Hillcrest core just to the south with the two medical centers containing the tallest structures in the neighborhood. The western portion of Medical Complex neighborhood has more single-family housing and residential structures. Development intensities, both residential and institutional, are higher in the Medical Complex neighborhood than in the majority of Uptown as hospitals and medical office buildings have a higher intensity of building floor area.

The Medical Complex neighborhood is dominated by Scripps Mercy Hospital and Medical Center and the UCSD Medical Center, which occupy over forty percent of the neighborhood. The remaining portion of the Medical Complex neighborhood is occupied primarily by residential uses, the majority being multi-family. Commercial development, which is mostly automobile oriented, is located on the north side of Washington Street, and sporadically surrounds the medical centers. The Medical Complex neighborhood contains the lowest proportion of single-family homes in Uptown. Multi-family buildings are more contemporary, reflecting a combination of Mid-Century, Late Modern, and Post-Modern styles. The medical buildings have an institutional character that distinguishes them from other developments in Uptown, and there is a much higher occurrence of free-standing parking garages, many of which have been sited in canyons to reduce their apparent mass. The character of the pedestrian focus varies according to the surrounding use. The residential areas have a pedestrian focus with street trees, while the hospital areas have a more vehicular access focus.

The block pattern of the Medical Complex neighborhood is similar to Hillcrest just north of Washington Street, with long north-south blocks with mid-block alleys. Approaching the canyons, the block dimensions begin to shift, first losing the mid-block alley, and then morphing into large-scale development parcels and curvilinear cul-de-sacs that respond to the topography at the canyon

interface. The scale of the residential streets in the Medical Complex neighborhood is similar to the residential portions of Mission Hills, with narrow, intimate streets. Except Bachman Place, which extends north through the area to Mission Valley, the streets in the Medical Complex neighborhood only provide for internal circulation, with the only external connection being to Washington Street.

The Hillcrest FPA area includes notable gateways and landmarks, including the historic Hillcrest neon sign located at the intersection of University and Fifth Avenue which provides a major gateway into the Hillcrest community. Other notable landmarks include Mercy Plaza, which includes a fountain and a landscaped memorial to Mercy staff; the Vermont Street Bridge, which is a pedestrian/bicycle bridge that connects the Uptown Center along Vermont Street to University Heights; and Pride Square, located at University Avenue and Normal Street, which includes the San Diego Pride Monument and the Hillcrest Pride Flag. Another landmark to the east is the Georgia Street Bridge, which is a gateway from North Park that rises above University Avenue.

### **c. University Community Plan Update**

Located about 13 miles north of Downtown San Diego, the University CPU area developed as the region's "edge city" with a concentration of homes, businesses, shopping, and entertainment venues. At the center of the community is a thriving, mixed-use core. This area includes large employers and visitor destinations, such as the University Towne Centre shopping center. Today, the San Diego Metropolitan Transit System Blue Line trolley provides service from University Towne Centre to the United States-Mexico border through Downtown San Diego, connecting residents throughout the City.

To the north of the University CPU area core, employment centers along Campus Point Drive and Towne Centre Drive have developed as a high-tech and biotech cluster with community and employee serving amenities. Surrounding this employment area is a unique and thriving canyon ecosystem, which offers natural views juxtaposed with state-of-the art research and development facilities. This area is also home to two major medical centers along with residential communities.

Nobel Drive is an emerging transit village which is a pedestrian-friendly mixed-use district that is oriented around the station of a high-quality transit system. It provides a mix of homes, jobs, and retail options within proximity to UCSD, which serves a regional employer and destination. This village is connected to both the Metropolitan Transit System SuperLoop and the Blue Line trolley, which are among the region's most heavily utilized transit assets. UCSD students, staff, and faculty enjoy gathering off-campus at Nobel Drive along with the broader community.

Just north of UCSD is the Torrey Pines State Natural Reserve. The ocean, coastal bluffs, and canyons, Torrey pine (*Pinus torreyana*) trees and other native vegetation offer breathtaking views and make the area highly valuable for community members to enjoy. This area is also home to the Torrey Pines Golf Course, which hosts annual tournaments drawing preeminent players and spectators alike. Complementing these destinations is another life science cluster.

Rose Canyon is a community asset that provides open space and recreation opportunities; it is home to regionally unique habitats and species such as coastal sage scrub, chaparral, and oak woodlands. South of Rose Canyon, a flourishing residential neighborhood is supported by locally

serving businesses and high-quality amenities, including schools and parks. Local shopping centers in this area serve community needs and offer spaces for local businesses.

### **4.1.1.3 Scenic Resources**

#### **a. Blueprint SD Initiative**

Nearly 28 percent of all existing land uses in the City consist of parks, open space, and recreation areas. These areas are reserved for environmental protection and/or public recreation, and they protect San Diego's unique natural landscape and scenic beauty. Natural scenic vistas can be seen from the approximately 36,000 acres of recreational and open space parks in the city, such as Mission Trails Regional Park, Marian Bear Memorial Park, Rose Canyon Open Space Park, Tecolote Canyon Natural Park and Nature Center, San Diego River Park, Los Peñasquitos Canyon Preserve, Black Mountain Open Space Park, and San Pasqual/Clevenger Canyon Open Space Park.

Public views are also identified in community plans, although the details vary from plan to plan. In the community plans that do identify public views, the views are typically those which overlook or face a body of water, most often the Pacific Ocean; however, the community plans also identify views overlooking canyons, the Downtown skyline, and open space.

#### **b. Hillcrest Focused Plan Amendment**

Due to the community's sloping topography, the Uptown Community Plan area has prominent public viewsheds and public view corridors which offer views to the San Diego Bay and Harbor, Mission Bay, Balboa Park, and Mission Valley as well as the community's many canyons. Unimproved rights-of-way, or 'paper streets', are common in the community and provide opportunities for public views when they intersect or abut canyons or steep hillsides.

The Hillcrest FPA area sits on a high mesa and the topography is relatively flat, except for the steep topography of the canyons to the north. The Medical Complex neighborhood in the northern part of the Hillcrest FPA area includes canyons which descend to Mission Valley and provide dramatic views north over Mission Valley. Within the Hillcrest FPA area, the Uptown Community Plan identifies a public viewshed on Bachman Place overlooking the canyons in the northern part of the Medical Complex neighborhood. The Uptown Community Plan also identifies a public view corridor adjacent to the Hillcrest FPA area along Upas Street from ~~6th~~Sixth Avenue to the entrance of Balboa Park.

#### **c. University Community Plan Update**

Nearly 32 percent of all existing land use in the University CPU area consists of parks, open space, and recreation areas. The University CPU area contains approximately 1,700 acres of resource-based parks, which are located at, or centered on, notable natural or man-made features (beaches, canyons, habitat systems, lakes, historic sites, and cultural facilities). Most natural open space in the University CPU area is concentrated in the Torrey Pines State Natural Reserve, alongside the Pacific Ocean. Torrey Pines City Park includes the bluff top and beach. Rose Canyon, an open space canyon, has hiking trails running through natural chaparral and oak woodland habitats.



A large portion of the open space in the community has regional significance and attraction. The Torrey Pines mesa and coastal areas contain the Torrey Pines State Natural Reserve and the Torrey Pines City Park and Municipal Golf Course. The beach, cliffs, native vegetation, and scenic views of the Pacific Ocean make these a one-of-a-kind City resource. The community's open space lands also form part of the City's Multi-Habitat Planning Area, including protected habitat and wildlife corridors for sensitive species.

Rose Canyon is a community asset that provides open space and recreation opportunities; it is home to regionally unique habitats and species such as coastal sage scrub, chaparral, and oak woodlands. South of Rose Canyon, a flourishing residential neighborhood is supported by locally-serving businesses and high-quality amenities, including schools and parks. Local shopping centers in this area serve community needs and offer spaces for local businesses.

The hillsides and canyons along Sorrento Valley and Soledad Canyon form a natural northern boundary to the community. Some of these slopes contain dense stands of native chaparral, while other sections have been disturbed and are vegetated primarily with grasses. This scenic system of slopes preserves native species and natural topography, has value in identifying and separating communities, and serves as a scenic resource.

To the north of the University CPU area core, employment centers along Campus Point Drive and Towne Centre Drive have developed as a high-tech and biotech cluster with community and employee serving amenities. Surrounding this employment area is a unique and thriving canyon ecosystem, which offers natural views juxtaposed with state-of-the art research and development facilities.

Several open space areas are interspersed throughout the community, primarily in the form of easements or private open space in planned residential developments. The slopes on the east side of Gilman Drive are preserved as open space by easement and provide a scenic entrance to this part of the community from I-5 and Sorrento Valley.

## **4.1.2 Regulatory Setting**

### **4.1.2.1 State Regulations**

#### **a. California Scenic Highways Program**

Recognizing the value of scenic areas and the value of views from roads in such areas, the California State Legislature established the California Scenic Highway Program in 1963. This legislation sees scenic highways as "a vital part of the all-encompassing effort . . . to protect and enhance California's beauty, amenity and quality of life." Under this program, a number of state highways have been designated as eligible for inclusion as scenic routes. There are two officially state-designated scenic highways in proximity to the project areas: 1) SR-163 from the southern boundary of Balboa Park to the northern boundary; and 2) SR-52 between Santo Road and Mast Boulevard. Scenic routes that are eligible for designation and are in proximity to the project areas include the following:

1. I-5 from the international boundary at Tijuana, Mexico to SR-75 south of San Diego Bay;

2. I-5 from SR-75 to the northern City boundary;
3. SR-52 east of La Jolla to Santo Road;
4. I-8 from I-5 to the eastern City boundary with the City of La Mesa;
5. SR-163 from Ash Street to I-8; and
6. SR-209 from Point Loma to I-5.

### **b. Public Resources Code Section 21099(d)(1)**

Public Resources Code (PRC) Section 21099(d)(1) states that a project's aesthetic and parking impacts shall not be considered a significant impact on the environment if:

- The project is a residential, mixed-use residential, or employment center project; and
- The project is located on an infill site within a Transit Priority Area (TPA).

PRC Section 21099(a) defines the following terms:

- "Employment center project" means a project on property zoned for commercial uses with a floor area ratio (FAR) of no less than 0.75 and that is within a TPA.
- "Infill site" means a lot within an urban area that has been previously developed or on a vacant site where at least 75 percent of the perimeter of the site adjoins or is separated only by an improved public right-of-way from parcels that are developed with qualified urban uses.
- "TPA" means an area within one-half mile of a major transit stop that is existing or planned. PRC Section 21064.3 defines a "major transit stop" as a site containing an existing rail transit station, a ferry terminal served by either a bus or rail transit, or an intersection of two or more major bus routes with a frequency of service interval of 15 minutes or less during the morning and afternoon peak commute periods.

### **c. Solar Shade Control Act (PRC Sections 25980-25986)**

This statute defines "solar collector" as a fixed device, structure, or part of a device or structure, which is used primarily to transform solar energy into thermal, chemical, or electrical energy. The solar collector shall be used as part of a system which makes use of solar energy for any or all of the following purposes: (1) water heating, (2) space heating or cooling, and (3) power generation. This provision prohibits a person owning or in control of a property to allow a tree or shrub to be placed, or, if placed, to grow on such property, subsequent to the installation of a solar collector on the property of another so as to cast a shadow greater than 10 percent of the collector absorption area upon that solar collector surface on the property of another at any one time between the hours of 10 a.m. and 2 p.m., local standard time; provided, that it does not apply to specific trees and shrubs which at the time of installation of a solar collector or during the remainder of that annual solar cycle cast a shadow upon that solar collector. Any city may adopt, by majority vote of the governing body, an ordinance exempting their jurisdiction from the provisions of this chapter.

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## 4.1.2.2 Local Regulations and Policies

### a. City of San Diego General Plan

The **Urban Design Element** of the General Plan provides guidance on respecting and elevating the City's "core values" related to urban form, including the natural environment; unique habitat and topography; compact and environmentally sensitive development patterns; and physical, social, and cultural diversity. The Urban Design Element includes general policies, as well as policies relating to distinctive neighborhoods and residential design, mixed-use villages and commercial areas, office and business park development, public spaces and civic architecture, and public art and cultural amenities. Specifically, policies in the Urban Design Element require that open space and landscape be used to define and link communities, and that development is designed to highlight and complement adjacent natural features. In terms of building design, the Urban Design Element calls for street frontages with architectural and landscape interests that provide visual appeal to the streetscape and enhance the pedestrian experience. Underground and above-ground parking structures are encouraged to reduce the amount and visual impact of surface parking; similarly, the visual impact of utilities and wireless facilities is to be minimized through their concealment and design. Policies relating specifically to residential design call for design continuity and compatibility with the larger neighborhood community and for subdivision design to maintain community character. Per the Urban Design Element, neighborhood streets are to be designed to improve walkability, strengthen connectivity, and enhance community identity. Similarly, mixed-use villages and commercial areas are to be designed to exhibit distinctive architectural features to differentiate residential, commercial, and mixed-use buildings and promote a sense of identity to village centers, while the public streetscape is to be designed for greater walkability and neighborhood aesthetics. Policies related to office and business park development require high quality design of buildings, structures, and parking areas, and public and cultural amenities are to be integrated into development to improve the quality of new development and reinforce community identity.

The **Conservation Element** of the General Plan guides the sustainable management of the City's natural resources, with sections on open space and landform preservation, wetlands, and the urban forest. Policies call for the conservation of landforms, canyon lands, and open spaces that define the City's urban form, serve as core biological areas and wildlife linkages or are wetland habitats. Policies related to urban forestry call for the planting of large canopy shade trees where appropriate and with consideration of habitat and water conservation goals, as well as the retention of significant and mature trees.

### b. San Diego Municipal Code

#### *Zoning*

The San Diego Municipal Code (SDMC) Chapter 13 includes land development and design standards for the City's base and overlay zones. citywide base zones specify permitted land uses, residential density, FAR, and other development requirements for given zoning classifications.

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### ***Coastal Height Limit Overlay Zone***

SDMC Chapter 13, Article 2, Division 5 provides a supplemental height limit for development within the Coastal Height Limit Overlay Zone. It states that no building or addition to a building shall be constructed with a height in excess of 30 feet within the Coastal Height Limit Overlay Zone of the City.

### ***Grading Regulations***

SDMC Chapter 14, Article 2, Division 1 addresses slope stability, protection of property, erosion control, water quality, landform preservation, and paleontological resources preservation. Included in this section are development standards for grading and maximum slope gradients.

### ***Landscape Regulations***

SDMC Chapter 14, Article 2, Division 4 addresses planting and irrigation requirements, yard planting area and point requirements, street tree requirements, revegetation and erosion control, brush management, and water conservation.

### ***Off-Site Development Impact Regulations***

SDMC Chapter 14, Article 2, Division 7 provides standards for air contaminants, noise, electrical/radioactivity disturbance, glare, and lighting. SDMC Section 142.0730, Glare Regulations, limits the percentage of a building's exterior that may be comprised of reflective material and limits the use of reflective material where it could contribute to traffic hazards, diminish quality of riparian habitat, or reduce enjoyment of public open space. SDMC Section 142.0740, Outdoor Lighting Regulations, addresses lighting design and installation to minimize negative impacts from light pollution to preserve enjoyment of the night sky and reduce conflict caused by unnecessary illumination.

### ***Environmentally Sensitive Lands Regulations***

The City's Environmentally Sensitive Lands (ESL<sub>s</sub>) Regulations (SDMC Chapter 14, Article 3, Division 1) address development on a premises where ESL<sub>s</sub> are present. ESL<sub>s</sub> include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and Special Flood Hazard Areas.

### ***Affordable Housing Regulations***

Consistent with State Density Bonus Law, the City has adopted affordable housing regulations (SDMC Chapter 14, Article 3, Division 7) to provide incentives for development that provides housing for very-low-income, low-income, moderate-income, or senior households, or lower income students, transitional foster youth, disabled veterans, or homeless persons. The regulations specify how compliance with California Government Code Section 65915 (State Density Bonus Law) would be implemented and are intended to assist in providing adequate and affordable housing for all economic segments of the community and to provide a balance of housing opportunities throughout the City. As a result of density bonus allowances as implemented through the SDMC Affordable Housing Regulations, development throughout the City may qualify for waivers and/or

incentives that allow for deviations to City development regulations such as increases in allowable height and/or FAR, which can result in development allowances in excess of the City's base zone regulations.

### ***Complete Communities Housing Solutions Regulations***

The Complete Communities Housing Solutions Regulations (SDMC Chapter 14, Article 3, Division 10) is an affordable housing incentive program aimed at encouraging residential development near high-frequency transit that incorporates affordable housing. The regulations provide a FAR based density bonus incentive program for development within Sustainable Development Areas that provides housing for very-low-income, low-income, or moderate-income households and provides neighborhood serving infrastructure amenities. A Sustainable Development Area is defined in SDMC Section 113.0103 as the area within a defined walking distance along a pedestrian path of travel from a major transit stop that is existing or planned, if the planned major transit stop is included in a transportation improvement program or applicable regional transportation plan, as follows:

- a) Within Mobility Zones 1 and 3, as defined in SDMC Section 143.1103, the defined walking distance is 1.0 mile.
- b) Within Mobility Zone 4, as defined in SDMC Section 143.1103, the defined walking distance is .75 mile.
- c) For parcels located in Mobility Zone 4, in an area identified as a High or Highest Resource California Tax Credit Allocation Committee (CTCAC) Opportunity Area, the defined walking distance is 1.0 mile.

SDMC Section 113.0103 also states that an adopted specific plan prepared in accordance with SDMC Section 122.0107(a), shall be within the Sustainable Development Area if the Sustainable Development Area is within a portion of the adopted specific plan.

A Program Environmental Impact Report (PEIR) was prepared for the Complete Communities: Housing Solutions regulations which analyzed the environmental impacts associated with implementation of the Complete Communities: Housing Solutions program and the Complete Communities: Mobility Choices program. The Final PEIR for Complete Communities: Housing Solutions and Mobility Choices (SCH No. 2019060003) was certified by the San Diego City Council on November 17, 2020 (Resolution R-313279).

### ***Green Building Regulations***

The City's Green Building Regulations (SDMC Chapter 14, Article 10) detail the use of building concepts to reduce negative environmental impacts or create positive environmental impacts, and encourage sustainable construction practices in planning and design, energy efficiency, water efficiency and conservation, material conservation and resource efficiency, and environmental quality. Pursuant to the regulations, new outdoor lighting fixtures shall minimize light trespass where applicable, or otherwise shall direct, shield, and control light to keep it from falling onto surrounding properties. The regulations prohibit direct-beam illumination from leaving the premises and require that most outdoor lighting be turned off between 11:00 p.m. and 6:00 a.m. with some

exceptions (such as lighting provided for commercial and industrial uses that continue to be fully operational after 11:00 p.m. for public safety).

### 4.1.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to aesthetics are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project have a substantial adverse effect on a scenic vista?
- 2) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- 3) Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point).
- 4) Would the project conflict with applicable zoning and other regulations governing scenic quality?
- 5) Would the project create a new source of substantial light, glare, or shade which would adversely affect day or nighttime views in the area?

### 4.1.4 Impact Analysis

#### Issue 1 Scenic Vistas

*Would the project have a substantial adverse effect on a scenic vista?*

##### a. Blueprint SD Initiative

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative's Climate Smart Village Areas. ~~Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide.~~ Nevertheless, it is anticipated that future increases in development densities and intensities would be most likely focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas.

Implementation of the Blueprint SD Initiative would increase development intensities that support higher density residential development and mixed-use development throughout the City, especially

within the Climate Smart Village Areas. These Climate Smart Village Areas are established urbanized areas that provide a mix of uses, are in proximity to transit, and are located throughout the City. Implementation of the Blueprint SD Initiative could result in new development and redevelopment that varies in building height, mass, form, and intensity which could block public views of scenic vistas, as identified in the General Plan and applicable community plans.

The Blueprint SD Initiative provides a robust policy framework that addresses the relationship between development and scenic views. The Urban Design Element includes policies such as, but not limited to, UD-A.3a, which calls for integrating development on hillside parcels with the natural environment to preserve and enhance views, and protect unique topography; UD-A.3l, which calls for protecting views from public roadways and parklands to natural canyons, resource areas, and scenic vistas; UD-A.3m, which calls for preserving views and view corridors along and/or into waterfront areas from the public right-of-way by decreasing the heights of buildings as they approach the shoreline, where possible; and UD-B.8g, which calls for laying out streets to take advantage of and maximize vistas into public view sheds. Community plans also include community-specific policies related to scenic resources within the community.

Adherence to the existing regulatory and policy framework would reduce potential impacts to scenic vistas. Future development would be subject to the underlying base zone regulations in the SDMC, which would dictate a development's ultimate height, mass, form, and intensity through the allowable FAR and setback standards, as applicable. Other regulations which would govern the design of future development and reduce potential impacts to scenic vistas include the City's ESL Regulations (SDMC Chapter 14, Article 3, Division 1), which would limit encroachment into the City's natural areas; the Coastal Height Limit Overlay Zone Regulations (SDMC Chapter 13, Article 2, Division 5), which would limit building heights to 30 feet for development within the Coastal Height Limit Overlay Zone; and airport height restrictions for development within proximity to public airports (i.e., Brown Field, Montgomery-Gibbs Executive Airport, Marine Corps Air Station Miramar, Naval Outlying Landing Field Imperial Beach, and San Diego International Airport).

Nevertheless, future development in accordance with the Blueprint SD Initiative is anticipated to result in areas of increased density, intensity, and building heights which could obstruct scenic vistas from public viewing locations. For example, although future development that occurs within the Coastal Height Limit Overlay Zone would be required to adhere to the 30-foot height limit, public views toward the coast from public parks and public rights-of-way could be affected by development that occurs in accordance with the Blueprint SD Initiative and that is located near coastal areas, but outside of the Coastal Height Limit Overlay Zone. Similarly, future development which utilizes the City's Complete Communities Housing Solutions Regulations (SDMC Chapter 14, Article 3, Division 10) and/or the City's Affordable Housing Regulations could have greater building heights and/or FAR over the City's base zone regulations. Such increases in development intensities could result in larger structures, increased height, and associated visual impacts.

PRC Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. Implementation of the project could result in the development of residential, mixed-use residential, and/or employment center projects on infill sites within TPAs because the project would increase opportunities for higher density residential and

mixed-use development within existing developed areas that are in proximity to transit. Therefore, pursuant to PRC Section 21099(d)(1), potential aesthetic impacts could be considered less than significant. However, not all development that would occur in accordance with the Blueprint SD Initiative would be within a TPA and/or would meet the criteria in PRC Section 21099(d)(1). Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to scenic vistas and could identify additional project features and/or mitigation measures to address potential impacts to scenic vistas. Additionally, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations, ESL regulations, and other City regulations would help reduce potential environmental impacts related to scenic vistas. However, due to the potential for deviations from the SDMC to be allowed, such as through a Planned Development Permit or allowances for waivers and/or concessions/incentives associated with affordable housing, it cannot be ensured that all applicable City land development and design regulations would apply. However, at this programmatic level of review without site-specific plans and potential deviations, impacts associated with scenic vistas would be significant.

## **b. Hillcrest Focused Plan Amendment**

The Hillcrest FPA area sits on a high mesa and the topography is relatively flat, except for the steep topography of the canyons to the north in the Medical Complex neighborhood that provide views over Mission Valley. The Uptown Community Plan identifies a public viewshed on Bachman Place which overlooks the canyons in the northern part of the Medical Complex neighborhood, and it also identifies a public view corridor adjacent to the FPA area along Upas Street from ~~6th~~Sixth Avenue to the entrance of Balboa Park.

The Uptown Community Plan includes a wide range of policies which address scenic views within the community. These policies include, but are not limited to, UD-1.1, which encourages designing buildings to limit their visual impact on views from within or across the canyon through landscape screening and by stepping building volumes down the slope; UD-1.2, which calls for preserving and enhancing viewsheds and view corridors from public streets and vantage points; UD-1.4, which calls for ensuring that public views are not obstructed when public streets and public right-of-way easements intersect Balboa Park and Community Plan designated open space; and UD-1.9, which encourages protecting the visual quality of landforms and the character of canyon neighborhoods. The Conservation Chapter of the Uptown Community Plan also includes policies that highlight the Uptown community's open space areas and natural resources, including CE-2.9, which calls for preserving undeveloped canyons and hillsides as important features of visual open space, community definition, and environmental quality; CE-2.15, which calls for public views from identified vantage points, to and from community landmarks and scenic vistas to be retained and enhanced as a public resource; and CE-2.18, which encourages development to evaluate the need for modified or increased setbacks when building adjacent to public view angles and discourages reduced setbacks that obscure established public vantage points unless alternative or improved public views are proposed.

Future development would be subject to the underlying base zone regulations in the SDMC, which would dictate a development's ultimate height, mass, form, and intensity through the allowable floor



area ratio and setback standards, as applicable. Adherence to the existing regulations and the policy framework proposed in the Hillcrest FPA would reduce potential impacts to scenic vistas in the Hillcrest FPA area. Nevertheless, future development under the Hillcrest FPA is anticipated to result in areas of increased density and building height that could have a substantial adverse effect on scenic vistas from a public viewing place. For example, increased densities proposed in the Medical Complex neighborhood near the identified public viewshed on Bachman Place could potentially impact views of or across the canyon. Similarly, future development which utilizes the City's Complete Communities Housing Solutions Regulations (SDMC Chapter 14, Article 3, Division 10) and/or the City's Affordable Housing Regulations could have greater building heights and/or floor area ratios over the City's base zone regulations. Such increases in development intensities could result in larger structures, increased height, and associated visual impacts.

PRC Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. Implementation of the project could result in the development of residential, mixed-use residential, or employment center projects on infill sites within TPAs because the project would increase opportunities for homes and jobs within existing developed areas that are in proximity to transit. Therefore, pursuant to PRC Section 21099(d)(1), potential aesthetic impacts could be considered less than significant. However, it is possible that not all development that would occur within the Hillcrest FPA area would meet the criteria in PRC Section 21099(d)(1). Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to scenic vistas and could identify additional project features and/or mitigation measures to address potential impacts to scenic vistas. Additionally, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations, ESL regulations, and other City regulations would help reduce potential environmental impacts related to scenic vistas. However, due to the potential for deviations from the SDMC to be allowed, such as through a Planned Development Permit or allowances for waivers and/or concessions/incentives associated with affordable housing, it cannot be ensured that all applicable City land development and design regulations would apply. However, at this programmatic level of review without site-specific plans and potential deviations, impacts associated with scenic vistas would be considered significant.

### **c. University Community Plan Update**

The University CPU area includes canyons, hillsides, bluffs, and other unique landforms which provide visual amenities within the community. The bluffs along the coast at the Torrey Pines State Natural Reserve and Torrey Pines City Park provide public views of the Pacific Ocean. In addition, open space areas throughout the community, including Rose Canyon, San Clemente Canyon, the hillsides and canyons along Sorrento Valley and Soledad Canyon, and the open space preserve associated with the UCSD campus are scenic natural resources within the community.

Figure 27 of the University CPU identifies two possible overlooks on Regents Road which would provide views of Rose Canyon from the north and south sides of the canyon. The University CPU also includes policies which encourage future development to consider scenic views within the community in their project design. These policies includes 2.7A, which encourages the retention of

natural topographic features such as drainage swales, streams, slopes, ridgelines, rock outcroppings, views, natural plan formations and trees to the extent possible; 2.7F, which calls on development to consider views into and from sloping areas; 2.9D, which encourages maximizing views from the development to open spaces by orienting the building to the open space, and by locating common amenity areas adjacent to the public open space; and 5.13B, which calls for preserving the scenic qualities of the surrounding coastal and canyon viewshed areas within scenic overlooks in Rose Canyon, San Clemente Canyon, Sorrento Valley, Roselle Canyon, and the canyon area between Campus Point Drive and Towne Centre Drive.

Potential impacts to scenic vistas would be minimized through required compliance with the existing regulatory framework and the University CPU's proposed SDRs. Future development in the University CPU area that is in the City's Coastal Height Limit Overlay Zone, as defined in SDMC Section 132.0505(b), would be required to adhere to the 30-foot height limit. The base zone regulations in the SDMC would also govern a development's ultimate height, mass, form, and intensity through the allowable FAR and setback standards, as applicable. Additionally, future development within the University CPU's Community Plan Implementation Overlay Zone (CPIOZ) Type A area would be required to comply with SDR-C.1 and SDR-C.2, which provide specific building transition requirements for certain types of residential development and for development adjacent to open space zoned properties. Compliance with these regulations would minimize potential impacts to public views of the community's natural resources, including its open space areas and the coast.

The University CPU does not propose any development within its open space areas. Future development would be concentrated in the center of the University CPU area and would occur predominantly within existing developed areas and along major transit corridors. Nevertheless, future development is anticipated to result in areas of increased density and building height that could have an adverse effect on scenic vistas from public viewing locations. Future development which utilizes the City's Complete Communities Housing Solutions Regulations and/or the Affordable Housing Regulations and associated density bonuses could have greater building heights and/or floor area ratios over the City's base zone regulations. Development within the University CPU CPIOZ-Type A boundaries would also be subject to SDR-J.1, which requires residential or mixed-use development to satisfy the Inclusionary Affordable Housing Regulations of the SDMC (Chapter 14, Article 2, Division 13) and provide affordable housing on-site or construct or rehabilitate affordable units offsite within a Sustainable Development Area within the University CPU area. Such increases in development intensities could result in larger structures, increased height, and associated visual impacts.

PRC Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. Implementation of the project could result in the development of residential, mixed-use residential, or employment center projects on infill sites within TPAs because the project would increase opportunities for homes and jobs within existing developed areas that are in proximity to transit. Therefore, pursuant to PRC Section 21099(d)(1), potential aesthetic impacts could be considered less than significant. However, not all development that would occur in accordance with the project would be within a TPA and/or would meet the criteria in PRC Section 21099(d)(1). Projects that require discretionary review would undergo a

project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to scenic vistas and could identify additional project features and/or mitigation measures to address potential impacts to scenic vistas. Additionally, as described above, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations, ESL regulations, and other City regulations would help reduce potential environmental impacts related to scenic vistas. However, due to the potential for deviations from the SDMC to be allowed, such as through a Planned Development Permit or allowances for waivers and/or concessions/incentives associated with affordable housing, it cannot be ensured that all applicable City land development and design regulations would apply. While it is unlikely that future development would result in a substantial adverse effect on a scenic vista, including the possible scenic overlooks identified on Figure 27 of the University CPU, it cannot be known at this program-level of review without site-specific plans and potential deviations. At this programmatic level of review, impacts associated with scenic vistas would be considered significant.

## Issue 2 Scenic Highways

*Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

Development associated with the project is not anticipated to substantially damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. There are two state-designated scenic highways in the City: 1) SR-163 from the southern to the northern boundary of Balboa Park; and 2) SR-52 between Santo Road and Mast Boulevard. The designated scenic portion of SR-163 is located within a canyon and, due to topography, surrounding future development would not be visible from this scenic road. The designated portion of SR-52 runs between the Fortuna Mountain and East Elliott areas and includes scenic views of Mission Trails Summit, which divides the coastal plain from the inland valley, and Cowles Mountain, the highest point in the City. As stated above in Section 4.1.2.1, scenic highways that are in proximity to the project areas and are eligible for designation include I-5 from the international boundary at Tijuana to SR-75 south of San Diego Bay; SR-52 east of La Jolla to SR-67 near the City of Santee; SR-163 from Ash Street to I-8; and SR-209 from Point Loma to I-5.

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative's Climate Smart Village Areas, which are areas that have good access to homes, jobs, and mixed-use destinations and that are in proximity to available high-frequency transit services, have transit access to job centers, and have good connections between transit and destinations. Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas.

The majority of the designated portion of SR-52 is within the Mission Trails Open Space area; however, there are pockets of development located southeast of Santo Road and northwest of Mast Boulevard which are visible from this scenic road. The Village Climate Goal Propensity Map does not identify any Climate Smart Village Areas adjacent to the designated portion of SR-52. However, as future updates to the San Diego Association of Governments Regional Plan and the regional transportation network occur, adjustments to the village propensity values identified in the Village Climate Goal Propensity Map could occur which could result in a shift in the boundaries of the Climate Smart Village Areas. Similarly, development could occur outside of these Climate Smart Village Areas where it would be considered appropriate for the surrounding area. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to scenic highways and could identify additional project features and/or mitigation measures to address potential impacts. Additionally, as described above, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations, ESL regulations, and other City regulations would help reduce potential environmental impacts related to scenic highways. However, due to the potential for deviations from the SDMC to be allowed, such as through a Planned Development Permit or allowances for waivers and/or incentives associated with affordable housing, it cannot be ensured that all applicable City land development and design regulations would apply. Thus, future development in accordance with the Blueprint SD Initiative could impact scenic resources that are visible from this scenic highway. At this programmatic level of review without site-specific plans and potential deviations, impacts would be considered significant.

The Village Climate Goal Propensity Map also identifies Climate Smart Village Areas in proximity to eligible scenic highways. These routes are not designated at this time; however, if these routes are officially designated in the future, future development in accordance with the Blueprint SD Initiative could impact scenic resources that are visible from these scenic highways. Therefore, at this programmatic level of review without site-specific plans, impacts would be considered significant.

There are no designated state scenic highways in the Hillcrest FPA area, and the designated portion of SR-163 lies outside of the Hillcrest FPA area. However, SR-163 from Ash Street to I-8 is an eligible state scenic highway which cuts through the Hillcrest FPA area. Although this route is not designated at this time, if this route is officially designated in the future, future development in accordance with the Hillcrest FPA could impact scenic resources that are visible from this scenic highway. Therefore, at this programmatic level of review without site-specific plans, impacts would be considered significant.

There are no designated state scenic highways in the University CPU area; however, SR-52 east of La Jolla to SR-67 near the City of Santee is an eligible state scenic highway that constitutes the southern boundary of the University CPU area. I-5 which crosses through the western-central portion of the University CPU area is also an eligible scenic highway. Although ~~this~~ these routes are not designated at this time, if ~~they~~ is ~~route is~~ are officially designated in the future, future development in accordance with the University CPU could impact scenic resources that are visible from this scenic highway. Therefore, at this programmatic level of review without site-specific plans, impacts would be considered significant.

## Issues 3 and 4 Visual Character or Quality of Public Views and Scenic Quality

*Would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point).*

*Would the project conflict with applicable zoning and other regulations governing scenic quality?*

Future development under the project is anticipated to be focused within existing developed areas that have existing infrastructure, public services, and amenities, and are in proximity to transit. These new developments and redevelopments could vary in building height, mass, form, architectural style, and intensity which could impact the existing visual character or quality of public views of the site and its surroundings. Implementation of the project could alter the existing visual character, including the bulk and scale and visual appearance of these areas via increased residential intensities, multi-modal transportation facility improvements, and new and improved public spaces. Additionally, future developments could require substantial grading which could affect a highly scenic or environmentally sensitive area. Future CPUs, Specific Plans, and FPAs that are undertaken under Blueprint SD would develop urban design policies, design standards, and SDRs in accordance with the urban design policies of the General Plan. These policies, design standards, and SDRs would guide future development in accordance with the urban design vision of the General Plan and the applicable community plan(s) and would provide for cohesive design themes, visual elements, and development patterns.

The proposed University CPU and Hillcrest FPA also provide urban design policies and SDRs which would be applied to projects within those project areas. Adherence to the regulatory and policy framework in the University CPU and Hillcrest FPA would provide for cohesive design themes, visual elements, and development patterns on a communitywide basis as the plan areas are built out. Within the University CPU area a number of SDRs regulate urban design including but not limited to SDR-A.2 which provides public space design and access requirements, SDR-C.1 which would require certain high density development with a residential use exceeding 30-feet in height to provide building transitions where located adjacent to low density residential, SDR-C.2 would require building transitions for properties abutting open space, SDR-D.1 would require parking structure screening, and SDR-E.1 would require urban parkway street trees. Communitywide Urban Design Policies are contained in the Implementation chapter of the University CPU and address transit-oriented design and access, policies addressing the public realm, site design building placement and orientation; screening and buffering; building massing, form and articulation, block size; hillsides/adaptation to topography; freeway adjacent development, canyon adjacent development, parking design, lighting, art installations, signage, and materials and colors. Additional Urban Design Policies are identified for specific areas including the North Torrey Pines Design District, Campus Point & Towne Centre Design District, University Towne Centre Design District, the Nobel/Campus Design District, South University Neighborhood Design District, and Miramar Design District.

Within the Hillcrest FPA area SDRs similarly regulate building design to support compatible urban design and the aesthetic visual character of the area. SDRs are provided specific to development within the Hillcrest Historic District that would ensure changes to contributing and non-contributing resources are regulated to preserve the character and integrity of historic features (SDR-C.1 and

SDR-C.2). Within the Hillcrest Historic District, SDR-C.3 would limit building height to 100 feet and SDR-C.4 would require building setbacks from contributing and non-contributing resources, as specified. More broadly, throughout the Hillcrest FPA area, the Urban Design Element policies would address the streetscape and public realm through detailed guidelines related to urban street and provision of amenities supporting walking, rolling and transit. The Hillcrest FPA Urban Design Element provides policy direction for the built form to protect the quality of views within and across canyons by stepping building volumes down slopes (UD-1.1) and protecting the visual quality of landforms and character of canyon neighborhoods (UD-1.9).

Development within the project areas would also be required to comply with existing regulations which govern visual character and scenic quality. This regulatory framework includes, but is not limited to, the City's ESL Regulations, which provide requirements for development on steep hillsides; the Coastal Height Limit Overlay Zone regulations, which caps building heights at 30 feet for development within the Coastal Height Limit Overlay Zone; and the base zone regulations. Mass grading is not anticipated since the developed project areas are relatively flat and already nearly fully developed with urban uses. Nevertheless, future development could occur in areas with steep slopes and would be required to comply with the provisions of the City's Multiple Species Conservation Program, ESL Regulations, and grading and landscape regulations. Compliance with these regulations would ensure future development would not substantially degrade the existing visual character or quality of public views. Nevertheless, future development is anticipated to result in areas of increased density and intensity which could result in development which impacts the existing visual character, quality of public views, and scenic quality. For example, future development which utilizes the City's Complete Communities Housing Solutions Regulations and/or the City's Affordable Housing Regulations and associated density bonuses could have greater building heights and/or FAR over the City's base zone regulations. Additionally, development within the University CPU CPIOZ-Type A boundaries would also be subject to SDR-J.1 which requires residential or mixed-use development to satisfy the Inclusionary Affordable Housing Regulations of the SDMC (Chapter 14, Article 2, Division 13) and provide affordable housing on-site or construct or rehabilitate affordable units offsite within a Sustainable Development Area within the University CPU area. Such increases in development intensities could result in larger structures, increased height, and associated visual impacts.

PRC Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. Implementation of the project could result in the development of residential, mixed-use residential, or employment center projects on infill sites within TPAs because the project would increase opportunities for homes and jobs within existing developed areas that are in proximity to transit. Therefore, pursuant to PRC Section 21099(d)(1), potential aesthetic impacts could be considered less than significant. However, not all development that would occur in accordance with the project would be within a TPA and/or would meet the criteria in PRC Section 21099(d)(1). Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to scenic vistas and could identify additional project features and/or mitigation measures to address potential impacts to the existing visual character, public views, and scenic quality. Additionally, as described above, compliance with the regulations in existence at the time the development is proposed

including the City's base zone regulations, ESL regulations, and other City regulations would help reduce potential environmental impacts related to existing visual character, public views, and scenic quality. However, due to the potential for deviations from the SDMC to be allowed, such as through a Planned Development Permit or allowances for waivers and/or concessions/incentives associated with affordable housing, it cannot be ensured that all applicable City land development and design regulations would apply. However, Therefore, at this programmatic level of review without site-specific plans and potential deviations, impacts would be considered significant.

## Issue 5 Light, Glare, or Shade

*Would the project create a new source of substantial light, glare, or shade which would adversely affect the area?*

Sources of light within the project areas include those typical of an urban community, such as building lighting for residential and commercial land uses, roadway infrastructure lighting, and signage. Future development associated with the project would introduce new residential interior and exterior lighting, parking lot lighting, commercial signage lighting, and lamps for streetscape and public recreational areas. Transportation infrastructure associated with future development could also include additional roadway lighting within or along public rights-of-way.

Future development would be required to comply with the applicable outdoor lighting regulations of the SDMC (Section 142.0740 et seq.) which would require development to minimize negative impacts from light pollution including light trespass, glare, and urban sky glow. Compliance with these regulations would preserve enjoyment of the night sky and minimize conflict caused by unnecessary illumination. New outdoor lighting fixtures would also be required to minimize light trespass in accordance with the California Green Building Standards Code, where applicable, or otherwise would be required to direct, shield, and control light to keep it from falling onto surrounding properties.

Future development associated with the project would also be required to comply with SDMC Section 142.0730 to limit the amount of reflective material on the exterior of a building that has a light reflectivity factor greater than 30 percent to a maximum of 50 percent. Additionally, per SDMC Section 142.0730(b), reflective building materials are not permitted where it is determined that their use would contribute to potential traffic hazards, diminish the quality of riparian habitat, or reduce enjoyment of public open space. Therefore, through regulatory compliance, the project would not create substantial light or glare that would adversely affect daytime or nighttime views in the area, and impacts would be less than significant.

Future development in accordance with the project is anticipated to result in areas of increased density, intensity, and building heights which could create new sources of shade in the project areas. Projects that create shade affecting nearby land uses would not necessarily be considered to have a significant impact on the environment; however, the extent and location of a project's shade effects would need to be considered in the context of applicable Community Plan policies. Some specific situations that may result in shade impacts include projects that would cast shadows that substantially impair the beneficial use of a public or quasi-public park, lawn, garden, or open space;

or affect the viability of existing solar collectors in conflict with the California PRC Sections 25980-25986.

As discussed above, PRC Section 21099(d)(1) states that aesthetic and parking impacts of a residential, mixed-use residential, or employment center project on an infill site within a TPA shall not be considered significant impacts on the environment. Implementation of the project could result in the development of residential, mixed-use residential, or employment center projects on infill sites within TPAs because the project would increase opportunities for homes and jobs within existing developed areas that are in proximity to transit. Therefore, pursuant to PRC Section 21099(d)(1), potential aesthetic impacts could be considered less than significant. However, not all development that would occur in accordance with the project would be within a TPA and/or would meet the criteria in PRC Section 21099(d)(1). Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to shade and could identify additional project features and/or mitigation measures to address potential shade impacts. Additionally, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations, ESL regulations, and other City regulations would help reduce potential environmental impacts related to shade. However, due to the potential for deviations from the SDMC to be allowed, such as through a Planned Development Permit or allowances for waivers and/or concessions/incentives associated with affordable housing, it cannot be ensured that all applicable City land development and design regulations would apply. Therefore However, at this programmatic level of review without site-specific plans and potential deviations, impacts associated with shade would be considered significant.

## Cumulative Impacts

Future development associated with the project would contribute to a significant cumulative impact to scenic views and vistas because higher intensity development and taller buildings may result from project implementation. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which could identify additional project features and/or mitigation measures to address potential impacts to scenic views and vistas. Additionally, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations and other City regulations would help reduce potential environmental impacts. However, due to the potential for deviations from the SDMC to be allowed, it cannot be ensured that all applicable City land development and design regulations would apply. Cumulatively, future development would potentially impact scenic views and vistas from public viewing locations throughout the City.

Development associated with the project could occur in proximity to currently designated and potentially eligible scenic highways, which could impact scenic viewsheds from these routes. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to scenic highways and could identify additional project features and/or mitigation measures to address potential impacts. Additionally, as described above, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations would help reduce potential environmental impacts. However, due to



the potential for deviations from the SDMC to be allowed, it cannot be ensured that all applicable City land development and design regulations would apply. Therefore, at this programmatic level of analysis, cumulative impacts would be significant.

Development under the project could potentially cumulatively impact the visual environment through the design, height, and location of future buildings. As future development occurs consistent with the project, development intensities and building heights could potentially impact the existing visual character or quality of public views and the scenic quality within the project areas. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which could identify additional project features and/or mitigation measures to address potential impacts to the visual environment. Additionally, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations and other City regulations would help reduce potential environmental impacts. However, due to the potential for deviations from the SDMC to be allowed, it cannot be ensured that all applicable City land development and design regulations would apply. Therefore, at this programmatic level of analysis, cumulative impacts would be significant.

Future development would be required to comply with the City's Off-Site Development Impact Regulations addressing light and glare, and cumulative light and glare impacts would be less than significant. Shade impacts associated with future projects would be site-specific; however, if higher intensity development is focused within specific areas of the City, such as within the Hillcrest FPA area or other areas with access to transit, cumulative development within a particular location could contribute to a cumulative ~~light and glare~~ shade impact affecting specific neighborhoods. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which could identify additional project features and/or mitigation measures to address potential impacts related to shade. Additionally, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations and other City regulations would help reduce potential environmental impacts. However, due to the potential for deviations from the SDMC to be allowed, it cannot be ensured that all applicable City land development and design regulations would apply. Therefore, cumulative impacts related to shade would be significant.

## **4.1.5 Significance of Impacts**

### **4.1.5.1 Scenic Vistas**

Implementation of the project is anticipated to result in areas of increased density, intensity, and building heights which could adversely affect scenic vistas from public viewing locations. The design of future development, including building mass, heights, and intensity, would be subject to the existing regulatory framework including, ~~but not limited to, urban design policies of the applicable Community Plan or FPA,~~ the City's base zoning regulations and all applicable SDRs at the time the development is proposed, which would reduce potential impacts to scenic vistas. Additionally, the Blueprint SD Initiative, Hillcrest FPA, and University CPU provide a range of policies that address the relationship between development and scenic views. Future projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies

and Adherence to these policies would further minimize potential impacts to scenic vistas. Nevertheless, at this programmatic level of review, and without project-specific development plans and potential deviations, impacts associated with scenic vistas and viewsheds would be significant.

### 4.1.5.2 Scenic Highways

Development associated with the project is not anticipated to substantially damage scenic resources, including trees, rock outcroppings, and historic buildings within a state scenic highway. However, future development could impact scenic views or vistas from a designated or eligible scenic highway in the City.

As stated above, future development would not be visible from the designated scenic portion of SR-163 due to topography, and the majority of the designated portion of SR-52 is within the Mission Trails Open Space area. The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, impacts associated with future development are more likely to be concentrated in these areas. The Village Climate Goal Propensity Map does not identify potential Climate Smart Village Areas in proximity to the designated scenic portion of SR-52. However, the boundaries of future Climate Smart Village Areas could shift as the regional transportation network is updated, and future development could occur within the scenic viewshed of this scenic route. Similarly, future development that follows the Blueprint SD Initiative's policy and land use framework and is located outside of a Climate Smart Village Area could potentially impact a scenic viewshed on this scenic route. Currently eligible scenic routes could also be designated in the future and development per the Blueprint SD Initiative could be within the potential scenic viewshed of these scenic routes. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to scenic highways and could identify additional project features and/or mitigation measures to address potential impacts. Additionally, as described above, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations, ESL regulations, and other City regulations would help reduce potential environmental impacts. However, due to the potential for deviations from the SDMC to be allowed, it cannot be ensured that all applicable City land development and design regulations would apply. Therefore, at this programmatic level of analysis without site-specific plans and potential deviations, impacts to scenic views or vistas from a state-designated highway would be significant.

Although there are no designated state scenic highways in the Hillcrest FPA area and the University CPU area, there are eligible scenic routes (i.e., SR-163 from Ash Street to I-8 and SR-52 east of La Jolla to SR-67 near the City of Santee) in proximity to these areas which could be designated in the future. If these routes are officially designated in the future, future development in accordance with the Hillcrest FPA and University CPU could impact scenic resources that are visible from these scenic highways. Therefore, at this programmatic level of review without site-specific plans, impacts would be considered significant.

### 4.1.5.3 Visual Character or Quality of Public Views and Scenic Quality

Compliance with City's regulations, development standards, urban design policies, and any SDRs proposed as part of the project and as part of future CPUs, Specific Plans, and FPAs would ensure that development under the project would not substantially alter the existing visual character, quality of public views, or scenic quality of the project areas. Future projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which could identify additional project features and/or mitigation measures to address potential impacts. Nevertheless, at this programmatic level of review, and without project-specific development plans and potential deviations, impacts associated with visual character, quality of public views, and scenic quality would be significant.

### 4.1.5.4 Light, Glare, or Shade

Required compliance with the SDMC would ensure impacts relative to lighting and glare would be less than significant. Future development is anticipated to result in areas of increased density, intensity, and building heights which could create new sources of shade in the project areas. Projects that require discretionary review would undergo a project-specific environmental review at the appropriate future time which would evaluate the project's consistency with applicable General Plan and Community Plan policies related to shade and could identify additional project features and/or mitigation measures to address potential shade impacts. Additionally, compliance with the regulations in existence at the time the development is proposed including the City's base zone regulations, ESL regulations, and other City regulations would help reduce potential environmental impacts related to shade. However, due to the potential for deviations from the SDMC to be allowed, it cannot be ensured that all applicable City land development and design regulations would apply. Therefore, at this programmatic level of review without site-specific plans and potential deviations, impacts associated with shade would be significant.

## 4.1.6 Mitigation, Monitoring, and Reporting

Potential impacts related to aesthetics would generally be addressed through compliance with the existing regulatory framework including urban design policies of the applicable Community Plan or FPA, City base zoning regulations, and any applicable SDRs. However, at this programmatic level of review without site-specific plans available for evaluation and the potential for deviations to be allowed, it is not possible to ensure all future impacts could be fully mitigated to less than significant. As future development is proposed, site design measures would be identified to reduce aesthetic impacts to the extent feasible. No additional feasible mitigation measures are available to address significant impacts to scenic vistas, scenic highways, visual character or quality of public views, scenic quality, and shade. Additional project features and/or mitigation measures may be identified at the project-level to reduce potential aesthetic impacts. Nevertheless, at a program level, impacts would remain significant.

## 4.2 Air Quality

This section analyzes the potential for significant impacts related to air quality and odor impacts to occur due to implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (CPU) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

Issues addressed in this section include conflicts with air quality plans, conflicts with air quality standards, impacts on sensitive receptors, and impacts related to odors. The analysis in this section is based on the methodology recommended by the San Diego Air Pollution Control District (SDAPCD), in addition to California Emissions Estimator Model (CalEEMod) version 2022.1 (California Air Pollution Control Officers Association [CAPCOA] 2022) results for two hypothetical projects included as Appendix K-1 and K-2.

### 4.2.1 Existing Conditions

The State of California is divided geographically into 15 air basins for managing the air resources of the state on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality. The project areas are located within the San Diego Air Basin (SDAB). The SDAB is currently classified as a federal non-attainment area for ozone (O<sub>3</sub>), and a state non-attainment area for particulate matter less than 10 microns (PM<sub>10</sub>), particulate matter less than 2.5 microns (PM<sub>2.5</sub>), and ozoneO<sub>3</sub>. The project areas are generally located within urbanized settings in proximity to major roads with access to transit. Additional existing conditions information related to climate conditions that affect air quality is provided in Section 2.3 of this PEIR.

Air quality at a particular location is a function of the kinds, amounts, and dispersal rates of pollutants being emitted into the air locally and throughout the basin. The major factors affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by inversions), and the local topography.

Air quality is commonly expressed as the number of days in which air pollution levels exceed state standards set by the California Air Resources Board (CARB) or federal standards set by the U.S. Environmental Protection Agency (USEPA). The SDAPCD maintains air quality monitoring stations located throughout the greater San Diego metropolitan region. Air pollutant concentrations and meteorological information are continuously recorded at these stations. Measurements are then used by scientists to help forecast daily air pollution levels.

As the project areas are citywide, air quality measurements from all four air quality stations in the City are reported. Table 4.2-1 summarizes the pollutant measurements recorded at four monitoring stations located throughout the project areas. The San Diego–Beardsley Street monitoring station is located at 1110 Beardsley Street near Downtown San Diego, the San Diego – Kearny Villa Road monitoring station is located at 6125A Kearny Villa Road in central San Diego, the San Diego – Rancho Carmel Drive monitoring station is located at 11403 Rancho Carmel Drive in northern San Diego, and the Otay Mesa – Donovan monitoring station is located at 480 Alta Road in southern San Diego near the U.S.-Mexico border. The Beardsley Street, Kearny Villa Road, and Otay Mesa monitoring stations measure the following pollutants: ozone (O<sub>3</sub>), nitrogen dioxide (NO<sub>2</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>. The Rancho Carmel Drive monitoring station measures NO<sub>2</sub>. The 6125A Kearny Villa Road station is the nearest station to the University CPU area and is located approximately 3 miles away from the CPU area.

<b>Table 4.2-1 Summary of Recorded Air Quality Measurements</b>			
Pollutant/Standard	Year		
	2020	2021	2022
<b>San Diego – Kearny Villa Road</b>			
Ozone (O <sub>3</sub> )			
Days State 1-hour Standard Exceeded (0.09 ppm)	2	1	1
Days State 8-hour Standard Exceeded (0.07 ppm)	10	1	2
Days 2008 Federal 8-hour Standard Exceeded (0.075 ppm)	6	0	1
Days 2015 Federal 8-hour Standard Exceeded (0.070 ppm)	10	1	2
Max. 1-hr (ppm)	0.123	0.095	0.095
Max. 8-hr (ppm)	0.102	0.071	0.083
Nitrogen Dioxide (NO <sub>2</sub> )			
Days Federal 1-hour Standard Exceeded (0.10 ppm)	0	0	0
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0
Max 1-hr (ppm)	0.052	0.060	0.051
Annual Average (ppm)	0.007	0.007	0.008
Particulate matter less than 2.5 microns in diameter (PM <sub>2.5</sub> )*			
Measured Days Federal 24-hour Standard Exceeded (35 µg/m <sup>3</sup> )	2	0	0
Calculated Days Federal 24-hour Standard Exceeded (35 µg/m <sup>3</sup> )	5.8	0	0
Max. Daily (µg/m <sup>3</sup> )	47.5	20.9	13.9
State Annual Average (µg/m <sup>3</sup> )	--	--	--
Federal Annual Average (µg/m <sup>3</sup> )	8.7	7.6	6.8
<b>San Diego – Rancho Carmel Drive</b>			
Nitrogen Dioxide (NO <sub>2</sub> )			
Days Federal 1-hour Standard Exceeded (0.10 ppm)	0	0	0
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0
Max 1-hr (ppm)	0.054	0.054	0.056
Annual Average (ppm)	0.014	0.013	0.015
<b>Otay Mesa – Donovan</b>			
Ozone (O <sub>3</sub> )			
Days State 1-hour Standard Exceeded (0.09 ppm)			
Days State 8-hour Standard Exceeded (0.07 ppm)	0.100	0.068	0.076
Days 2008 Federal 8-hour Standard Exceeded (0.075 ppm)	4	0	1
Days 2015 Federal 8-hour Standard Exceeded (0.070 ppm)	10	0	2
Max. 1-hr (ppm)	0.113	0.085	0.114
Max. 8-hr (ppm)	0.100	0.068	0.076

Table 4.2-1 Summary of Recorded Air Quality Measurements			
Pollutant/Standard	Year		
	2020	2021	2022
Nitrogen Dioxide (NO <sub>2</sub> )			
Days Federal 1-hour Standard Exceeded (0.10 ppm)	0	0	0
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0
Max 1-hr (ppm)	0.056	0.061	0.064
Annual Average (ppm)	0.008	0.008	0.007
Particulate matter less than 2.5 microns in diameter (PM <sub>2.5</sub> )*			
Measured Days Federal 24-hour Standard Exceeded (35 µg/m <sup>3</sup> )	--	--	--
Calculated Days Federal 24-hour Standard Exceeded (35 µg/m <sup>3</sup> )	--	--	0
Max. Daily (µg/m <sup>3</sup> )	--	--	30.7
State Annual Average (µg/m <sup>3</sup> )	13.9	12.4	--
Federal Annual Average (µg/m <sup>3</sup> )	--	--	--
SOURCE: CARB 2023. ppm = parts per million; µg/m <sup>3</sup> = micrograms per cubic meter -- = Not available. *Calculated days value. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.			

## 4.2.2 Regulatory Setting

“Air pollution” is a general term that refers to one or more chemical substances that degrade the quality of the atmosphere. Individual air pollutants may adversely affect human or animal health, reduce visibility, and damage our natural environment. The Clean Air Act (CAA) requires the USEPA to set Ambient Air Quality Standards (AAQS) for six common pollutants, known as criteria pollutants. These criteria pollutants are: ozone (O<sub>3</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), nitrogen dioxide (NO<sub>2</sub>), lead, and particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>).

Motor vehicles are San Diego County’s leading source of air pollution (SDAPCD 2016). Other mobile sources include gas and diesel-powered motor vehicles, lawn care equipment, construction equipment, buses, trains, and aircraft. Emission standards for mobile sources are established by CARB at the state level and by USEPA at the federal level. Reducing mobile source emissions requires the technological improvement of existing mobile sources (e.g., retrofitting older vehicles with cleaner emissions technologies) and the examination of cleaner fuels and technologies in the development of future mobile sources. The State of California has developed statewide programs to encourage cleaner cars and cleaner fuels. The regulatory framework described below summarizes the federal and state agencies responsible for monitoring and controlling mobile source air pollutants and the measures currently being taken to achieve and maintain healthful air quality.

In addition to mobile sources, stationary sources also contribute to air pollution. Stationary sources are regulated by the SDAPCD and include furnaces to heat buildings, gasoline stations, power plants, dry cleaners, manufacturing, and other commercial and industrial uses.

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## 4.2.2.1 Federal Regulations

### a. Clean Air Act

AAQS represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect the public health and welfare. The federal CAA was enacted in 1970 and amended in 1977 and 1990 (42 United States Code [USC] 7401) for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity. In 1971, to achieve the purposes of Section 109 of the CAA (42 USC 7409), the USEPA developed primary and secondary National Ambient Air Quality Standards (NAAQS).

Six criteria pollutants of primary concern have been designated: ozone $O_3$ , CO, SO<sub>2</sub>, NO<sub>2</sub>, lead, and particulate matterPM. The primary NAAQS were established, with a margin of safety, considering long-term exposure for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties). The secondary NAAQS "...protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" [42 USC 7409(b)(2)]. The primary and secondary NAAQS are presented in Table 4.2-2 (CARB 2022).

An air basin is designated as either attainment or non-attainment for a particular pollutant; non-attainment areas may be further classified as marginal, moderate, serious, severe, or extreme non-attainment area. States are required to adopt enforceable plans, known as State Implementation Plans (SIPs), to achieve and maintain air quality meeting the NAAQS. State plans must also control emissions that drift across state lines and harm air quality in downwind states. Once a non-attainment area has achieved the NAAQS for a particular pollutant, it is redesignated as an attainment area for that pollutant. To be redesignated, the area must meet air quality standards for three consecutive years. After redesignation to attainment, the area is known as a maintenance area and must develop a 10-year plan for continuing to meet and maintain air quality standards, as well as satisfy other requirements of the CAA. The SDAB is a non-attainment area for the federal ozone standards. Table 4.2-3 summarizes the SDAB attainment status for each criteria pollutant.

Table 4.2-2 Ambient Air Quality Standards						
Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>		
		Concentration <sup>3</sup>	Method <sup>4</sup>	Primary <sup>3,5</sup>	Secondary <sup>3,6</sup>	Method <sup>7</sup>
Ozone <sup>8</sup>	1 Hour	0.09 ppm (180 µg/m <sup>3</sup> )	Ultraviolet Photometry	-	Same as Primary Standard	Ultraviolet Photometry
	8 Hour	0.07 ppm (137 µg/m <sup>3</sup> )		0.070 ppm (137 µg/m <sup>3</sup> )		
Respirable Particulate Matter (PM <sub>10</sub> ) <sup>9</sup>	24 Hour	50 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	150 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m <sup>3</sup>		-		
Fine Particulate Matter (PM <sub>2.5</sub> ) <sup>9</sup>	24 Hour	No Separate State Standard		35 µg/m <sup>3</sup>	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m <sup>3</sup>	Gravimetric or Beta Attenuation	12 µg/m <sup>3</sup>		
Carbon Monoxide (CO)	1 Hour	20 ppm (23 mg/m <sup>3</sup> )	Non-dispersive Infrared Photometry	35 ppm (40 mg/m <sup>3</sup> )	-	Non-dispersive Infrared Photometry
	8 Hour	9.0 ppm (10 mg/m <sup>3</sup> )		9 ppm (10 mg/m <sup>3</sup> )	-	
	8 Hour (Lake Tahoe)	6 ppm (7 mg/m <sup>3</sup> )		-	-	
Nitrogen Dioxide (NO <sub>2</sub> ) <sup>10</sup>	1 Hour	0.18 ppm (339 µg/m <sup>3</sup> )	Gas Phase Chemi- luminescence	100 ppb (188 µg/m <sup>3</sup> )	-	Gas Phase Chemi- luminescence
	Annual Arithmetic Mean	0.030 ppm (57 µg/m <sup>3</sup> )		0.053 ppm (100 µg/m <sup>3</sup> )	Same as Primary Standard	
Sulfur Dioxide (SO <sub>2</sub> ) <sup>11</sup>	1 Hour	0.25 ppm (655 µg/m <sup>3</sup> )	Ultraviolet Fluorescence	75 ppb (196 µg/m <sup>3</sup> )	-	Ultraviolet Fluorescence; Spectro- photometry (Pararosaniline Method)
	3 Hour	-		-	0.5 ppm (1,300 µg/m <sup>3</sup> )	
	24 Hour	0.04 ppm (105 µg/m <sup>3</sup> )		0.14 ppm (for certain areas) <sup>11</sup>	-	
	Annual Arithmetic Mean	-		0.030 ppm (for certain areas) <sup>11</sup>	-	
Lead <sup>12,13</sup>	30 Day Average	1.5 µg/m <sup>3</sup>	Atomic Absorption	-	-	High Volume Sampler and Atomic Absorption
	Calendar Quarter	-		1.5 µg/m <sup>3</sup> (for certain areas) <sup>12</sup>	Same as Primary Standard	
	Rolling 3-Month Average	-		0.15 µg/m <sup>3</sup>		
Visibility Reducing Particles <sup>14</sup>	8 Hour	See footnote 14	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24 Hour	25 µg/m <sup>3</sup>	Ion Chroma- tography			
Hydrogen Sulfide	1 Hour	0.03 ppm (42 µg/m <sup>3</sup> )	Ultraviolet Fluorescence			
Vinyl Chloride <sup>12</sup>	24 Hour	0.01 ppm (26 µg/m <sup>3</sup> )	Gas Chroma- tography			

See footnotes on next page.



**Table 4.202 footnotes  
Ambient Air Quality Standards**

- ppm = parts per million; ppb = parts per billion;  $\mu\text{g}/\text{m}^3$  = micrograms per cubic meter; - = not applicable.
- <sup>1</sup> California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter ( $\text{PM}_{10}$ ,  $\text{PM}_{2.5}$ , and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
  - <sup>2</sup> National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For  $\text{PM}_{10}$ , the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above  $150 \mu\text{g}/\text{m}^3$  is equal to or less than one. For  $\text{PM}_{2.5}$ , the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
  - <sup>3</sup> Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of  $25^\circ\text{C}$  and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of  $25^\circ\text{C}$  and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
  - <sup>4</sup> Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.
  - <sup>5</sup> National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
  - <sup>6</sup> National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
  - <sup>7</sup> Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
  - <sup>8</sup> On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
  - <sup>9</sup> On December 14, 2012, the national annual  $\text{PM}_{2.5}$  primary standard was lowered from  $15 \mu\text{g}/\text{m}^3$  to  $12.0 \mu\text{g}/\text{m}^3$ . The existing national 24-hour  $\text{PM}_{2.5}$  standards (primary and secondary) were retained at  $35 \mu\text{g}/\text{m}^3$ , as was the annual secondary standards of  $15 \mu\text{g}/\text{m}^3$ . The existing 24-hour  $\text{PM}_{10}$  standards (primary and secondary) of  $150 \mu\text{g}/\text{m}^3$  also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
  - <sup>10</sup> To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.
  - <sup>11</sup> On June 2, 2010, a new 1-hour  $\text{SO}_2$  standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971  $\text{SO}_2$  national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.  
Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
  - <sup>12</sup> The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
  - <sup>13</sup> The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard ( $1.5 \mu\text{g}/\text{m}^3$  as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
  - <sup>14</sup> In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.
- SOURCE: CARB 2016a.

**Table 4.2-3  
San Diego Air Basin Attainment Status**

Criteria Pollutant	Federal Designation	State Designation
O <sub>3</sub> (8-hour)	Non-attainment	Non-attainment
O <sub>3</sub> (1-hour)	Attainment	Non-attainment
CO	Attainment	Attainment
PM <sub>10</sub>	Unclassifiable	Non-attainment
PM <sub>2.5</sub>	Attainment	Non-attainment
NO <sub>2</sub>	Attainment	Attainment
SO <sub>2</sub>	Attainment	Attainment
Lead	Attainment	Attainment
Sulfates	No Federal Standard	Attainment
Hydrogen Sulfide	No Federal Standard	Unclassified
Visibility Reducing Particles	No Federal Standard	Unclassified

SOURCE: SDAPCD ~~2024~~2022

## 4.2.2.2 State Regulations

### a. California Clean Air Act

The California Clean Air Act (CCAA) was enacted in 1988 (California Health & Safety Code [H&SC] Section 39000 et seq.). Under the CCAA, CARB has developed the California Ambient Air Quality Standards (CAAQS), which generally set more stringent limits on the criteria pollutants than the NAAQS (see Table 4.2-2). In addition to the federal criteria pollutants, the CAAQS also specify standards for visibility-reducing particles, sulfates, hydrogen sulfide, and vinyl chloride.

Similar to the federal CAA, the CCAA classifies “attainment” or “non-attainment” areas for each pollutant based on the comparison of measured data with the CAAQS. The SDAB is a non-attainment area for the state ozoneO<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> standards. Table 4.2-3 summarizes the SDAB attainment status for each criteria pollutant.

### b. State Implementation Plan

The SIP is a collection of documents that set forth the state’s strategies for achieving the NAAQS. In California, the SIP is a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls. CARB is the lead agency for all purposes related to the SIP under the state law. Local air districts and other agencies, such as the Department of Pesticide Regulation and the Bureau of Automotive Repair, prepare SIP elements and submit them to CARB for review and approval. CARB then forwards SIP revisions to the USEPA for approval and publication in the Federal Register. All of the items included in the California SIP are listed in the Code of Federal Regulations (CFR) at 40 CFR 52.220.

The SDAPCD is responsible for preparing and implementing the portion of the SIP applicable to the SDAB. The SIP plans for San Diego County specifically include the Redesignation Request and Maintenance Plan for the 1997 National Ozone Standard for San Diego County (2012), and the 2004

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Revision to the California State Implementation Plan for the Carbon Monoxide–Updated Maintenance Plan for Ten Federal Planning Areas.

### **c. Toxic Air Contaminants**

The public's exposure to toxic air contaminants (TACs) is a significant public health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and to reduce exposure to these contaminants to protect the public health (Assembly Bill [AB] 1807: H&SC Sections 39650–39674). The Legislature established a two-step process to address the potential health effects from TACs. The first step is the risk assessment (or identification) phase. The second step is the risk management (or control) phase of the process.

The California Air Toxics Program establishes the process for the identification and control of TACs and includes provisions to make the public aware of significant toxic exposures and for reducing risk. Additionally, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly Bill) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The goals of the Air Toxics "Hot Spots" Act are to collect emission data, to identify facilities having localized impacts, to ascertain health risks, to notify nearby residents of significant risks, and to reduce those significant risks to acceptable levels. The Children's Environmental Health Protection Act, California Senate Bill 25 (Chapter 731, Escutia, Statutes of 1999) requires CARB to review its air quality standards from a children's health perspective, evaluate the statewide air monitoring network, and develop any additional air toxic control measures needed to protect children's health. Locally, toxic air pollutants are regulated through the SDAPCD's Regulation XII.

Of particular concern statewide are diesel-exhaust particulate matter (DPM) emissions. DPM was established as a TAC in 1998 and is estimated to represent a majority of the cancer risk from TACs statewide (based on the statewide average). Diesel exhaust is a complex mixture of gases, vapors, and fine particles. Some of the chemicals in diesel exhaust, such as benzene and formaldehyde, have been previously identified as TACs by the CARB and are listed as carcinogens either under the State's Proposition 65 or under the federal Hazardous Air Pollutants program.

Following the identification of DPM as a TAC in 1998, CARB has worked on developing strategies and regulations aimed at reducing the risk from DPM. The overall strategy for achieving these reductions is found in the Risk Reduction Plan to Reduce Particulate Matter Emissions from Diesel-Fueled Engines and Vehicles (CARB 2000). A stated goal of the plan is to reduce the statewide cancer risk arising from exposure to DPM by 85 percent by 2020. To monitor the effectiveness of these efforts, CARB has supported field campaigns that measure real-world emissions from heavy-duty vehicles, and results indicate that regulations aimed at reducing emissions of DPM have been successful.

In April 2005, CARB published the Air Quality and Land Use Handbook: A Community Health Perspective (CARB 2005). The handbook's recommendations are directed at protecting sensitive land uses from air pollutant emissions while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics, etc.). The handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB handbook, there is currently no adopted standard for the significance of health effects from mobile sources.

Therefore, the CARB has provided guidelines for the siting of land uses near heavily traveled roadways. The CARB guidelines indicate that siting new sensitive land uses within 500 feet of a freeway or an urban road with 100,000 or more vehicles per day should be avoided when possible.

According to the studies used to support the advisory distances, the freeways used in the handbook analysis were Interstate 405 and Interstate 710, both in Los Angeles and both with volumes of over 200,000 vehicles per day along the segments studied. Actual air emissions and concentration levels are more nuanced and varied in the project areas and depend on local factors such as traffic volumes, wind speed and direction, and meteorological conditions. The handbook recommendations are designed to fill a gap where area-specific information is not available.

### 4.2.2.3 Local Regulations

#### a. Regional Air Quality Strategy

The SDAPCD is the agency that regulates air quality in the SDAB. The SDAPCD prepared the Regional Air Quality Strategy (RAQS) to address state requirements, pursuant to the CCAA of 1988 (H&SC Section 39000 et seq.). The CCAA requires areas that are designated non-attainment of CAAQS for ozone $O_3$ ,  $CO$ ,  $SO_2$ , or  $NO_2$  to prepare and implement state plans to attain the standards by the earliest practicable date [H&SC Section 40911(a)]. With the exception of state and federal ozone standards, each of these standards has been attained in the SDAB (SDAPCD 2022a).

Included in the RAQS are the Transportation Control Measures (TCMs) prepared by the San Diego Association of Governments (SANDAG) that control emissions from mobile sources (SDAPCD 2022b). The RAQS and TCMs set forth the steps needed to accomplish attainment of the CAAQS for ozone. The most recent update of the RAQS (2022 RAQS) and corresponding TCM was adopted in March 2023.

#### b. SPAPCDSDAPCD Rules

Title V of the Federal Clean Air Act requires that state, local and tribal air quality agencies develop and maintain a program to issue federal operating permits to affected facilities. SDAPCD Regulation XIV (Title V Operating Permits) contains the requirements for implementing the Title V permit program. The SDAPCD Title V Operating Permit Program requires all major sources, as defined by Rule 1401, to obtain permits are issued pursuant to District Regulation XIV. Permits incorporate federal, state and local District requirements of SDAPCD permits for these sources.

In addition to the Title V Operating Permit Program, tThe SDAPCD has established a number of rules that regulate air quality including the following:

- Rule 50 (Visible Emissions) prohibits the discharge of any air contaminant other than uncombined water vapor for a period aggregating more than 3 minutes in any 60-minute period that is of a certain opacity specified in the rule. This regulation addresses diesel emissions associated with diesel pile driving, asphalt paving, among other activities that can result in visible emissions.

- Rule 51 (Nuisance) prohibits discharge of air contaminants or other material which cause injury, detriment, nuisance or annoyance to a considerable number of persons or which endanger the comfort, repose, health or safety of such persons or cause injury or damage to business or property.
- Rule 52 (Particulate Matter) prohibits discharge of particulate matter in excess of 0.10 grain per dry standard cubic foot (0.23 grams per dry standard cubic meter) of gas.
- Rule 54 (Dust and Fumes) prohibits discharge of specified quantities of pollutants into the atmosphere within any one hour, including lead and lead compounds, as specified in the regulation.
- Rule 55 (Fugitive Dust Control) prohibits airborne dust beyond the property line for a period aggregating more than 3 minutes in any 60-minute period. This is typically achieved by watering during grading activities, installing erosion control measures and track-out grates or gravel beds and egress points to preventing dirt “track out” onto streets, using soil stabilizers, mulching or seeding, in addition to other measures.
- Rule 67.0.1 (Architectural Coatings) establishes volatile organic compounds (VOC) limits on architectural coatings that are produced, sold, or applied within San Diego County.

### **c. San Diego Association of Governments**

SANDAG is the regional planning agency for the County and serves as a forum for regional issues relating to transportation, the economy, community development, and the environment. SANDAG serves as the federally designated metropolitan planning organization for the County. With respect to air quality planning and other regional issues, SANDAG’s San Diego Forward: The 2021 Regional Plan (Regional Plan) was adopted by the SANDAG Board of Directors on December 10, 2021. The Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources. The plan identifies five big moves including Complete Corridors, Transit Leap, Mobility Hubs, Flexible Fleets, and Next Operating System as key strategies for a more vibrant, connected region (SANDAG 2021).

SANDAG, as the region’s metropolitan planning organization, must make a transportation air quality conformity determination for regional transportation plans (RTPs) and regional transportation improvement programs. The purpose of transportation conformity is to ensure that federally funded or approved activities are consistent with the SIP. This ensures that no transportation activities will cause or contribute to new air quality violations, worsen existing violations, or delay the attainment of any relevant NAAQS. Appendix C of the Regional Plan documents conformity for the 2008 and 2015 ozone NAAQS for the 2021 Regional Plan and air quality analysis for the 2021 Regional Transportation Improvement Program Amendment No. 06. The 2021 Regional Plan serves as the region’s RTP. SANDAG is in the process of updating the Regional Plan with an expected availability date of 2025.

## d. City of San Diego General Plan

The **Conservation Element** of the City of San Diego General Plan discusses air quality and the background of air quality in the region. Applicable General Plan policies, including new and/or updated policy language applicable to air quality include the following.

**Goal:** Regional air quality which meet state and federal standards.

**Policy CE-F.4:** Preserve and plant trees, and plants that are consistent with habitat and water conservation policies and that absorb carbon dioxide and pollutants.

**Policy CE-F.5:** Promote technological innovations to help reduce automobile, truck, and other motorized equipment emissions.

**Policy CE-F.6:** Encourage and provide incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking/rolling. Continue to implement programs to provide City employees with incentives for the use of alternatives to single-occupancy vehicles.

The **Land Use and Community Planning Element** of the City of San Diego General Plan (City of San Diego 2015) includes the following policy regarding toxic air emissions and associated health risks:

**Policy LU-I.14:** As part of community plan updates or amendments that involve land use or intensity changes, evaluate public health risks associated with identified sources of hazardous substances and toxic air emissions (see also Conservation Element, Section F). Create adequate distance separation, based on documents such as those recommended by the California Air Resources Board and site-specific analysis, between sensitive receptor land use designations and potential identified sources of hazardous substances such as freeways, industrial operations or areas such as warehouses, train depots, port facilities, etc.

## e. City of San Diego Municipal Code

The City of San Diego's (City's) Off-Site Development Impact Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 2, Division 7) are intended to provide standards for air contaminants, noise, electrical/radioactivity disturbance, glare, and lighting. The division applies to all development that produces air contaminants, noise, electrical/radioactivity disturbance, glare, or lighting in any zone. SDMC Section 142.0710 establishes that air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located.

## 4.2.3 Significance Determination Thresholds

### 4.2.3.1 CEQA Guidelines

Thresholds used to evaluate potential impacts related to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022), and applicable air district standards described below. The following issue questions are addressed in this section:

- 1) Would the project conflict with or obstruct implementation of the applicable air quality plan?
- 2) Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?
- 3) Would the project expose sensitive receptors to substantial pollutant concentrations?
- 4) Would the project result in odors adversely affecting a substantial number of people?

### 4.2.3.2 San Diego Air Pollution Control District

#### a. Air Quality Standards

Regarding a violation of air quality standards (Issue 2), the City's CEQA Significance Determination Thresholds include screening levels for evaluating construction and operational emissions. For purposes of CEQA, the daily (pounds) thresholds are most appropriately used for standard development projects and plans with defined construction and operational components. Note that if construction and operational components are expected to overlap on a given day, then emissions from both construction and operation should be combined and compared to the thresholds shown in Table 4.2-4. In special circumstances, such as a project with intermittent uses (for example, the project includes the use of emergency generators or other stationary sources), it may be appropriate to include an assessment of emissions at the annual time scale in addition to an analysis of daily emissions. The air quality impact screening levels for determining whether air quality impacts are significant are shown in Table 4.2-4.

Table 4.2-4 Criteria Pollutant Significance Thresholds			
Pollutant	Emission Rate		
	Pounds/Hour	Pounds/Day	Tons/Year
PM <sub>10</sub>	--	100	15
PM <sub>2.5</sub> <sup>a</sup>	--	67	10
NO <sub>x</sub>	25	250	40
SO <sub>x</sub>	25	250	40
CO	100	550	100
Lead	--	3.2	0.6
VOC	--	137	15

SOURCE: SDAPCD, Rules 20.1, 20.2, 20.3; City of San Diego 2022.  
 NO<sub>x</sub> = oxides of nitrogen; SO<sub>x</sub> = oxides of sulfur; CO = carbon monoxide; PM<sub>10</sub> = particulate matter less than 10 microns; VOC = volatile organic compounds; ROG = reactive organic gases;  
 PM<sub>2.5</sub> = particulate matter less than 2.5 microns.  
<sup>a</sup>The City does not specify a threshold for PM<sub>2.5</sub>. Threshold here is based on the SDAPCD, Rules 20.1, 20.2, 20.3.

The above thresholds are applicable to individual development projects and not a program-level analysis such as the proposed project. The project-level thresholds are intended to ensure many individual projects would not obstruct the timely attainment of the NAAQS and CAAQS. Generally, discretionary program-level planning activities, such as general plans, community plans, or ordinance amendments, are evaluated for consistency with the local air quality plans as a measure of significance.

## b. Toxic Air Emissions

Regarding exposure of sensitive receptors to toxic air emissions (Issue 3), the issue to be considered is whether the project would exacerbate existing environmental conditions or create environmental conditions that would increase in or result in new sources of toxic air emissions. In other words, the analysis must focus on the impact of the project on the environment and not the impact of the environment on the project consistent with the Court's findings in *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, Case No. S213478, which states:

In light of CEQA's text, statutory structure, and purpose, we conclude that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment – and not the environment's impact on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions." Notwithstanding "special CEQA requirements [that] apply to certain airport, school and housing construction projects[,]” the Court held “that ordinary CEQA analysis is



concerned with a project's impact on the environment, rather than with the environment's impact on a projects and its users or residents.

For SDAPCD permitted projects in general, the SDAPCD does not identify a significant impact if the potential health risks from the proposed project would be below the health risk public notification thresholds specified by SDAPCD Rule 1210. The public notification thresholds are:

- Maximum incremental cancer risks equal to or greater than 10 in one million, or
- Cancer burden equal to or greater than 1.0, or
- Total acute non-cancer health hazard index equal to or greater than 1.0, or
- Total chronic non-cancer health hazard index equal to or greater than 1.0.

Therefore, for the purposes of evaluating the potential health risks associated with the exposure of sensitive receptors air toxics addressed in this assessment, a significant impact could occur if the project would result in a worst-case incremental cancer risk greater than or equal to 10 in one million, or if the worst-case total acute or chronic health hazard index is greater than or equal to one. In cases where a health risk assessment is conducted for a project where the exposure is due to existing environmental conditions, such as a residential development adjacent to a freeway, the results of the health risk assessment may be included for disclosure purposes. If the public health risk threshold ~~are~~ exceeded due to an impact of the environment on a project, a significant land use impact may be identified by the City for projects that involve land use or intensity changes due to potential conflicts with Policy LU-1.14 (see Section 4.2.2.3.d).

## 4.2.4 Impact Analysis

### Issue 1 Conflicts with Air Quality Plans

*Would the proposed project conflict with or obstruct the implementation of the applicable air quality plan?*

The CCAA requires air basins that are designated nonattainment of the CAAQS for criteria pollutants prepare and implement plans to attain the standards by the earliest practicable date. The two pollutants addressed in the San Diego SIP and RAQS are reactive organic gas (ROG) and oxides of nitrogen (NO<sub>x</sub>), which are precursors to the formation of ozone (O<sub>3</sub>). The SIP and the RAQS, which in conjunction with the TCMs were most recently updated in 2022, serve as the air quality plans for the SDAB.

The basis for the SIP and RAQS is the distribution of population in the region as projected by SANDAG. The SDAPCD refers to approved general plans to forecast, inventory, and allocate regional emissions from land use and development-related sources. These emissions budgets are used in statewide air quality attainment planning efforts. As such, projects that propose development at an intensity equal to or less than the population growth projections and land use intensity described in their local land use plans are inherently consistent.

The project is intended to establish land uses that facilitate transit-oriented, multiple-use villages, districts, and developments within the Climate Smart Village Areas. The Blueprint SD Initiative would

update the citywide land use framework designed around the 2050 regional transportation network and would guide future land use changes as part of community plan updates, specific plans, and focused plan amendments. In project areas within communities that have not undergone a recent comprehensive CPU, it is possible that the project could result in additional new development beyond the densities assessed in current community plans.

Recent CPU Environmental Impact Reports (EIRs) recognized that as the community plans were updated, newly designated land uses would be forwarded to SANDAG for inclusion in future updates to the air quality plans for the SDAB. The current SIP and RAQS were last updated in 2022 and are intended to be updated on a three-year cycle. Therefore, densities within community plans adopted after 2022 would not be reflected in the current air quality plans. Additional density from land use changes and rezones associated with the Blueprint SD Initiative, the Hillcrest FPA, and University CPU would also not be reflected in the air quality plans. Thus, implementation of the project would could result in a significant impact due to conflicts with the land use assumptions used to develop current RAQS and SIP until such a time as the updated housing and employment projections are given to SANDAG to update the air quality plans for the SDAB.

## Issue 2 Air Quality Standards

*Would the proposed project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

Air quality impacts can result from the construction and operation of a project which results in emissions above air quality standards. Construction impacts are short term and result from fugitive dust, equipment exhaust, and indirect effects associated with construction workers and deliveries. Operational impacts can occur on two levels: regional impacts resulting from development, or local effects stemming from sensitive receivers being placed close to roadways or stationary sources.

The project includes planning level actions that do not propose any physical development at this time. Adoption of the Blueprint SD Initiative, the University CPU, Hillcrest FPA, future LDC amendments, CPUs, and plan amendments consistent with the Village Climate Goal Propensity Map would not result in impacts related to air quality standards during construction or operation because they are not associated with any physical development. However, project implementation anticipates future development would occur consistent with adopted planning documents. Future development projects would involve construction and operational emissions, which could exceed air quality standards resulting in a significant impact.

### a. Construction

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include:

- Fugitive dust from grading activities;
- Construction equipment exhaust;
- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

Construction activities such as the operation of on-site heavy-duty construction vehicles and the transport of materials and labor to and from construction sites would be the primary sources of NO<sub>x</sub>, CO, and SO<sub>2</sub> emissions. Site preparation activities such as grading and excavation, road construction, and building demolition and construction would be the primary sources of PM<sub>10</sub> and PM<sub>2.5</sub> emissions. Painting during the architectural coating phase and off-gas emissions associated with asphalt paving would be the main contributor of ROG emissions. Mobile source emissions from vehicle and construction equipment exhaust, as well as from haul trips associated with earthwork material hauling would also be a primary contributor of NO<sub>x</sub> emissions generation.

Future construction activities associated with development facilitated by the project are anticipated to occur sporadically over the years with 2050 being the assumed planning horizon based on the Blueprint SD Initiative methodology detailed in Attachment A of Appendix J. Buildout would comprise of multiple projects undertaken by individual developers/project applicants, each having its own construction timeline and activities. At a program level of review and without project-specific development proposals, the specific locations, timing, or scale of developments that will be implemented in the future are not known. However, future development is anticipated throughout the City, primarily within Climate Smart Village areas. To characterize the potential construction emissions that may occur from build-out of the plans, two hypothetical projects at a development intensity that would be reasonably foreseeable to be constructed in the future are evaluated. The analysis of hypothetical projects provides a conservative analysis of the worst-case potential emissions associated with construction and provide a representative analysis of the potential project-level impacts that could occur with development facilitated by the project. Two hypothetical scenarios were modelled that represent a range of the size and scope of potential future projects that could be constructed within the project areas based on the development regulations and policies of the Blueprint SD Initiative, University CPU, and Hillcrest FPA.

### ***Hypothetical Project #1***

Hypothetical project #1 includes demolition of an existing 5,000-square-foot structure and the construction of a 50-unit multi-family structure on a 2.0-acre site. Detailed analysis and modeling results are included as Appendix K-1. Air emissions for this hypothetical scenario were calculated using the California Emissions Estimator Model (CalEEMod) version 2022.1 (California Air Pollution Control Officers Association [CAPCOA] 2022). The CalEEMod program is a tool used to estimate air emissions resulting from land development projects based on California-specific emission factors. CalEEMod can estimate the required construction equipment when project-specific information is unavailable. Air emission estimates in CalEEMod are based on the duration of construction phases; construction equipment type, quantity, and usage; grading area; season; and ambient temperature, among other parameters.

This hypothetical analysis assumes that standard dust and emission control during grading operations would be implemented to reduce potential nuisance impacts and to ensure compliance with SDAPCD Rule 55.0. An architectural coating VOC limit of 50 grams per liter was assumed for all interior and exterior coatings to reflect the requirements of SDAPCD, Rule 67.0.1. A summary of the modeling results for this hypothetical project is shown in Table 4.2-5, which shows project-based construction emissions compared to project-level significance thresholds. Emissions reported in

Table 4.2-5 are the maximum emissions for each pollutant that would occur during development of a residential project. The various emission levels would not necessarily occur simultaneously. These are, therefore, the worst-case emissions.

<b>Table 4.2-5 Hypothetical Project #1 Maximum Daily Construction Emissions (pounds/day)</b>						
	Pollutant (pounds per day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Residential Project	8	14	16	<1	3	2
<i>Project-level Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>55</i>
SOURCE: Appendix K-1 ROG = reactive organic gases; NO <sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO <sub>2</sub> = sulfur dioxide; PM <sub>10</sub> = particulate matter less than 10 microns; PM <sub>2.5</sub> = particulate matter less than 2.5 microns.						

As shown in Table 4.2-5, this hypothetical residential project would not result in construction-related air emissions that exceed the applicable thresholds.

### **Hypothetical Project #2**

Hypothetical project #2 includes a 5-acre mixed-use development consisting of the demolition of a 20,000-square-foot structure and the construction of 300 multi-family residential units and 10,000 square feet of retail uses. Detailed analysis and modeling results are included as Appendix K-2. Air emissions for this hypothetical scenario were calculated using CalEEMod version 2022.1 (CAPCOA 2022).

A summary of the emissions associated with construction of this hypothetical project is shown in Table 4.2-6, which shows the anticipated construction emissions compared to the project-level significance thresholds.

<b>Table 4.2-6 Hypothetical Project #2 Maximum Daily Construction Emissions</b>						
	Pollutant (pounds per day)					
	ROG	NO <sub>x</sub>	CO	SO <sub>2</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Mixed-Use Project	43	32	31	<1	9	5
<i>Project-Level Threshold</i>	<i>137</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>55</i>
SOURCE: Appendix K-2 ROG = reactive organic gases; NO <sub>x</sub> = oxides of nitrogen; CO = carbon monoxide; SO <sub>2</sub> = sulfur dioxide; PM <sub>10</sub> = particulate matter less than 10 microns; PM <sub>2.5</sub> = particulate matter less than 2.5 microns.						

As shown in Table 4.2-6, this hypothetical mixed-use project would not result in construction-related air emissions that would exceed the applicable thresholds.

While individually, both hypothetical projects would result in emissions less than the significance thresholds, if several of these types of projects were to occur simultaneously within the same project area, implementation of the development anticipated under the project could exceed the significance thresholds. Similarly, the project would support increased development densities and intensities throughout the project areas, which could result in daily construction emissions which exceed those modeled under both the hypothetical projects discussed above depending on the specific location and timing of construction since air emissions from construction are localized.

All projects would be required to adhere to all existing regulations during construction to protect air quality including SDAPCD rules and regulations, and existing state and City regulations which include, but are not limited to:

- The California Airborne Toxics Control Measure (Title 13, Section 2485 of the California Code of Regulations (CCR)), which requires that construction contractors shall minimize equipment idling times either by shutting equipment off when not in use or reducing the maximum idling time to 5 minutes; and
- The City's Grading Permit Procedures (SDMC Chapter 12, Article 9, Division 6), which requires that all grading meeting specified criteria, including all projects with proposed blasting, shall comply with the City's Municipal Code Grading Permit Procedures and all blasting shall be completed by a person, persons, firm or corporation that has obtained, from the Fire Chief of the City, a permit as required under California Health and Safety Code (H&SC), Section 12101.
- Compliance with applicable SDAPCD Rules (refer to Section 4.2.2.3b of this PEIR).

### ***Construction Screening Criteria***

As detailed in the preceding analysis of construction emissions for two hypothetical projects, construction emissions associated with a typical project with the following characteristics would not exceed air quality emission thresholds during construction:

- Demolition of an existing 5,000-square-foot structure and the construction of a 50-unit multi-family structure on a 2.0-acre site.
- A 5-acre mixed-use development consisting of the demolition of a 20,000-square-foot structure and the construction of 300 multi-family residential units and 10,000 square feet of retail uses.

Future development of a project with a similar or smaller scope and size of construction would not typically result in a significant impact related to construction emissions. However, as the exact number and timing of individual development projects that could occur as a result of implementation of the project are unknown at this time, it is possible that multiple projects could be constructed simultaneously, and future development could exceed emissions thresholds. Therefore, construction-related air quality impacts would be potentially significant.

## b. Operational Emissions

Operational emissions are long-term and include mobile and area sources. Sources of operational emissions associated with future projects developed under the ~~proposed~~ project include the following:

- Traffic generated by the project; and
- Area source emissions from the use of natural gas, landscaping equipment, fireplaces, and consumer products.

Emissions of ROG, CO, NO<sub>x</sub>, and SO<sub>2</sub> are primarily emitted from the combustion of fossil fuels, such as gasoline or diesel, associated with motor vehicle usage and transportation. Ozone is a secondary criterion air pollutant, which is formed when ROGs and NO<sub>x</sub> undergo photochemical reactions in sunlight. Particulate emissions have several sources, including industrial, agricultural, construction, and transportation activities. Actual emissions would vary depending on future projects and regulations.

As discussed in Chapter 3.0, the project would support additional development primarily, but not exclusively, within Climate Smart Village Areas including within the University CPU area and Hillcrest FPA area. Anticipated development densities and intensities would exceed the densities currently anticipated in community plans. As detailed in recent CPU EIRs, generally when increases in densities are proposed, operational emission impacts were found to be significant and unavoidable. Where densities proposed were the same as or below the existing plan buildout densities, impacts were found to be less than significant.

For purposes of analyzing potential operational emissions of the project, operational emissions are assumed to increase due to the increase in proposed densities and intensities. The primary source of operational emissions resulting from residential development is vehicle emissions. While the proposed project could increase multi-family residential densities and intensities, implementation of development within Climate Smart Village Areas would focus development within high village climate goal propensity areas where land uses have a high propensity for walking/rolling, bicycling and transit. This would support a land use pattern that is efficient in terms of a reduction in vehicle miles traveled and associated operational air emissions. Additionally, high-density residential development generally would result in less area source emissions associated with fireplaces and landscape equipment, compared to lower density/intensity land uses.

### ***Project-level Operational Screening Criteria***

As future development occurs in the City, individual projects would be evaluated to determine their potential to exceed applicable criteria pollutant significance thresholds specified in Table 4.2-4. The Bay Area Air Quality Management District (BAAQMD) has developed operational screening criteria in their 2022 CEQA Guidelines (BAAQMD 2022). Preliminary screening provides lead agencies with a conservative indication of whether implementing a project could result in the generation of operational criteria air pollutants or precursors that exceed the thresholds of significance. Similar to the SDAB, the BAAQMD covers an air basin that is coastal, transitioning into mountainous. Additionally, both the SDAB and the Bay Area have similar criteria pollutant attainment/nonattainment status. The BAAQMD criteria pollutant thresholds are more strict than

the City's thresholds, therefore, these screening standards are conservative. While the BAAQMD operational screening criteria are not adopted by the City, they provide an informative tool to identify when a detailed assessment may be required. According to the BAAQMD 2022 CEQA Guidelines, if all the following screening criteria are met, the operation of a project would result in a less-than-significant operational impact related to criteria air pollutants and precursors:

- The project size is at or below the applicable operational screening level size shown in Table 4.2-7.
- Operational activities would not include stationary engines (e.g., backup generators) and industrial sources subject to Air District rules and regulations.
- Operational activities would not overlap with construction-related activities.

In the City, these screening criteria are an informative tool to identify whether a project has the potential to approach a significant impact. Due to the BAAQMD thresholds being more conservative for all criteria pollutants, the screening criteria provide an informative tool appropriate for use in the City.

If the City determines a project may exceed City operational thresholds for criteria pollutants, the a project includes any of the operational screening criteria above, then a detailed assessment of the project's criteria air pollutant and precursor emissions may be required. The operational screening criteria used by BAAQMD Although these screening criteria were developed for use in the Bay Area, they can may be used as a project screening tool within the SDAB because the BAAQMD significance thresholds are more restrictive than the City's significance thresholds (see Table 4.2-4) for all criteria pollutants. Projects that do not exceed the sizes identified in Table 4.2-7 and that meet the screening criteria detailed above, would typically result in less than significant operational emissions.

Land Use Category	Land Use Subcategory	Land Use Unit	Operational Screening Level
Commercial	Bank	KSF	102
Commercial	General Office Building	KSF	765
Commercial	Government (Civic Center)	KSF	314
Commercial	Government Office Building	KSF	445
Commercial	Hospital	KSF	611
Commercial	Medical Office Building	KSF	293
Commercial	Office Park	KSF	706
Commercial	Pharmacy – Drug Store	KSF	89
Commercial	Research & Development	KSF	692
Education	Daycare Center	KSF	232
Education	School – Elementary	KSF	488
Education	School – Junior High	KSF	475
Education	School – High School	KSF	579
Education	College – Junior (2-year)	KSF	429
Education	College – University (4-year)	KSF	779
Education	Library	KSF	123
Education	Worship Place	KSF	642
Industrial	General Heavy Industry	KSF	1,009
Industrial	General Light Industry	KSF	998
Industrial	Industrial Park	KSF	1,247
Industrial	Manufacturing	KSF	1,009
Industrial	Warehouse <sup>1</sup>	KSF	1,423
Recreational	Arena	KSF	600
Recreational	City Park	Acres	175
Recreational	Fast Food Restaurant	KSF	21
Recreational	Health Club	KSF	261
Recreational	Hotel	Rooms	633
Recreational	Motel	Rooms	767
Recreational	Movie Theater	KSF	80
Recreational	Restaurant – High Turnover (Sit-Down)	KSF	75
Recreational	Restaurant – Quality (Fine Dining)	KSF	105
Recreational	Racquet Club	KSF	457
Recreational	Recreational Swimming Pool	KSF	376
Residential	Apartments	DU	638
Residential	Condo – Townhouse	DU	637
Residential	Mobil Home Park	DU	721
Residential	Congregate Care/Retirement Community	DU	1,008
Residential	Single Family Housing	DU	421
Retail	Auto Care Center	KSF	356
Retail	Convenience Market	KSF	11
Retail	Discount Store	KSF	150
Retail	Home Improvement Superstore/ Hardware-Paint Store	KSF	221
Retail	Regional Shopping Center	KSF	221
Retail	Strip Mall	KSF	204
Retail	Supermarket	KSF	72

DU = dwelling unit; KSF = thousand square feet  
<sup>1</sup> The use of the warehouse land use is not appropriate for a logistics or distribution center. These types of projects should use project-specific traffic data or a more land use-specific trip generation rate.  
 SOURCE: BAAQMD 2022.



Implementation of the project is likely to result in additional residential and mixed-use development consistent with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU. Additionally, within the University CPU area, additional non-residential development is anticipated. Much of the anticipated development would be infill projects that would not exceed City significance thresholds for criteria pollutants. However, at a program level of review, and because future development consistent with the project could result in larger scale development that could exceed the City's significance thresholds for criteria pollutants, impacts related to conflicts with air quality standards would be significant.

### Issue 3: Sensitive Receptors

*Would the proposed project expose sensitive receptors to substantial pollutant concentrations?*

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive receptors include children, the elderly, and the acutely and chronically ill, especially those with cardiorespiratory diseases. Sensitive land uses include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities.

Whether the project would expose sensitive receptors to substantial pollutant concentrations focuses on whether the project would exacerbate environmental hazards or conditions that already exist. Placing housing near a freeway in a location with poor air quality would not alone be considered a significant impact; however, if a project could result in effects on the environment that would exacerbate existing environmental conditions (e.g. air quality), then the impact could be considered significant. *California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, Case No. S213478, states:

In light of CEQA's text, statutory structure, and purpose, we conclude that agencies generally subject to CEQA are not required to analyze the impact of existing environmental conditions on a project's future users or residents. But when a project risks exacerbating those environmental hazards or conditions that already exist, an agency must analyze the potential impact of such hazards on future residents or users. In those specific instances, it is the project's impact on the environment – and not the environment's impact on the project – that compels an evaluation of how future residents or users could be affected by exacerbated conditions."

Notwithstanding "special CEQA requirements [that] apply to certain airport, school and housing construction projects[,]," the Court held that ordinary CEQA analysis is concerned with a project's impact on the environment, rather than with the environment's impact on a project and its users or residents. The analysis that follows addresses whether the project could exacerbate environmental conditions such that the project would expose sensitive receptors to substantial pollutant concentrations.

## a. Localized Carbon Monoxide Hot Spots Impacts

A CO hotspot is an area of localized CO pollution caused by severe vehicle congestion on major roadways, typically near intersections during busy travel times. Localized CO concentration is a direct function of motor vehicle activity at signalized intersections (e.g., idling time and traffic flow conditions), particularly during peak commute hours and meteorological conditions. Under specific meteorological conditions, CO concentrations may reach unhealthy levels with respect to local sensitive land uses.

The SDAB is a CO maintenance area under the federal CAA. This means that SDAB was previously a nonattainment area and is currently implementing a 10-year plan for continuing to meet and maintain air quality standards. According to the California Department of Transportation's (Caltrans') Project-Level Carbon Monoxide Protocol (CO Protocol), in maintenance areas, only projects that are likely to worsen air quality necessitate further analysis. The CO Protocol indicates projects may worsen air quality if they worsen traffic flow, defined as increasing average delay at signalized intersections operating at level of service (LOS) E or F or causing an intersection that would operate at LOS D or better without the project to operate at LOS E or F. Accordingly, the CO Protocol recommends detailed air quality dispersion modeling for projects that may worsen traffic flow at any signalized intersections operating at LOS E or F.

Due to increased requirements for cleaner vehicles, equipment, and fuels, CO levels in the state have dropped substantially. All air basins are attainment or maintenance areas for CO. Therefore, more recent screening procedures based on more current methodologies have been developed. The BAAQMD developed a screening threshold in their 2022 CEQA Guidelines (BAAQMD 2022). If all the following screening criteria are met, operation of the project would result in a less-than significant impact related to CO carbon monoxide (BAAQMD 2022):

- The project is consistent with an applicable congestion management program established by the county congestion management agency for designated roads or highways, the regional transportation plan, and local congestion management agency plans.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour.
- Project-generated traffic would not increase traffic volumes at affected intersections to more than 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadway)

The Bay Area and San Diego have the same federal and state CO attainment designations, and therefore experience similar CO concentrations; thus, these screening volumes are appropriate for evaluating CO impacts in the SDAB.

As implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would introduce land use changes and rezones, the project would result in increases in density throughout appropriate areas of the City, with a primary focus on land use change in Climate Smart Village Areas. This growth could increase intersection volumes citywide, although a focus of the project is to support a shift in mode share toward transit, walking and bicycling, thereby reducing automobile

trips. While specific increases in intersection volumes were not evaluated with this effort, based on Caltrans data for average daily traffic volumes on ramp segments in San Diego County between 2012 and 2021, the highest average daily traffic volume on any freeway ramp is reported at 61,000 trips per day, located at the interchange of Interstate 15 and State Route 78, north of the City (Caltrans, 2021). On and off-ramp volumes from surface streets to freeways that require vehicles to stop and start (more characteristic of intersection movements) are much lower. The highest daily intersection volume in the City is conservatively assumed at 61,000 trips per day (using freeway ramp volumes as a proxy for the highest possible intersection movements in the region). This would equate to approximately 6,100 trips per hour based on hourly volumes typically being 10 percent of the daily traffic volume for the peak hour (Caltrans, 2021). This conservative hourly traffic volume would be well below the 44,000 vehicle per hour threshold for open air intersections cited above. Over the course of plan build-out, while growth would occur adding to traffic volumes, vehicle emissions would become cleaner over time as older vehicles are retired and replaced by new vehicles. Additionally, as transit investments provide additional transit infrastructure, the City's goal is to achieve a higher proportion of transit use. Based on the preceding analysis, combined with the fact that vehicle fleets will continue to become cleaner over the years as older vehicle models are phased out and replaced by new cleaner vehicles, impacts related to localized CO carbon monoxide hot spots would be less than significant.

## **b. Toxic Air Emissions**

### ***Construction***

Construction of future projects and associated infrastructure implemented under the project would result in short-term diesel exhaust emissions from the use of on- and off-site heavy-duty equipment. Construction would result in the generation of DPM emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities, and on-road diesel equipment used to bring materials to and from project sites.

While future construction of specific development projects is unknown at this time, generation of DPM from construction projects typically occurs in a single area for a short period. According to the Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project (OEHHA 2015). Thus, if the duration of proposed construction activities near any specific sensitive receptors were a year, the exposure would be three percent of the total exposure period used for health risk calculation.

Considering this information, the highly dispersive nature of DPM, required compliance with SDAPCD air quality rules, and the fact that construction activities would occur intermittently and at various locations throughout the project areas, DPM generated by construction is not expected to create conditions where the probability is greater than 10 in 1 million of developing cancer for the Maximally Exposed Individual or to generate ground-level concentrations of non-carcinogenic toxic air contaminants that exceed a Hazard Index greater than 1 for the Maximally Exposed Individual. Additionally, with ongoing implementation of USEPA and CARB requirements for cleaner fuels; off-road diesel engine retrofits; and new, low-emission diesel engine types; the DPM emissions of individual equipment would be substantially reduced over the years as buildout continues.

Therefore, impacts related to exposure of sensitive receptors to construction toxic air emissions would be less than significant.

### **Stationary Sources**

Generally, stationary sources that emit toxic air emissions include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses. The project would facilitate the development of high-density multi-family and mixed-use development. While residential land uses are not sources of TAC, other land uses such as dry cleaners and gas stations could be proposed within the project areas, which represent sources of TACs. Additionally, non-residential land uses in the University CPU area including future light industrial land uses may include stationary air emissions. While, any project with a stationary source would be subject to SDAPCD permitting, including required compliance with applicable permit conditions and rules; at a program level of review, it is not possible to know with certainty the location of future stationary noise sources in relation to sensitive land uses and whether SDAPCD permitting requirements would be sufficient to reduce impacts to less than significant. Therefore, impacts related to this issue would be significant.

### **Mobile Sources**

Future development could be sited near existing sources of TAC, specifically in proximity to freeways where diesel particulate matter from mobile source emissions is a source of TAC. Although locating development near toxic air emissions would be considered an impact of the environment on the project, the issue of appropriate siting in relation to TACs is considered typically with reference to the siting distances recommended by CARB's Air Quality and Land Use Handbook: A Community Health Perspective, which provides guidance on land use compatibility with sources of TACs (CARB 2005). The handbook is not a law or adopted policy, but offers advisory recommendations for the siting of sensitive receptors near uses associated with TACs, such as freeways and high-traffic roads, to help protect sensitive members of the population.

The handbook makes recommendations directed at protecting sensitive land uses from air pollutant emissions while balancing a myriad of other land use issues (e.g., housing, transportation needs, economics, etc.). It notes that the handbook is not regulatory or binding on local agencies and recognizes that application takes a qualitative approach. As reflected in the CARB Handbook, there is currently no adopted standard for the significance of health effects from mobile sources. Therefore, the CARB has provided guidelines for the siting of land uses near heavily traveled roadways. Of pertinence to this study, the CARB guidelines recommend that siting new sensitive land uses within 500 feet of a freeway or urban roads with 100,000 or more vehicles per day should be avoided.

However, CARB notes that these recommendations are advisory and should not be interpreted as defined "buffer zones," and that local agencies must balance other considerations such as transportation needs, the benefits of urban infill, community economic development priorities, and other quality-of-life issues. CARB's position is that infill, mixed-use, higher density, transit-oriented development and other concepts that benefit regional air quality can be compatible with protecting the health of individuals at the neighborhood level.

A number of Interstates (5, 8, 15, 805, and 163) and State Routes (54, 56, 52, 75, 94, and 905) run adjacent to and/or through portions of the project areas. Residential and mixed-uses under the

project could be located within 500 feet of these major freeways. Recent comprehensive CPUs have conducted an evaluation of sensitive receptor exposure to mobile source emissions within their EIRs. These recent EIRs generally identified the potential for sensitive receptors to be exposed to mobile source emissions within 500 feet of a freeway and identified policies that would be implemented to ensure projects are appropriately sited and designed to reduce exposure to mobile source emissions, consistent with the CAPCOA guidance document titled, Health Risk Assessments for Proposed Land Use Projects (CAPCOA 2009). This document provides recommended measures that would help to reduce the exposure of sensitive receptors to concentrations of DPM such as planting vegetation between the receptor and the freeway, constructing barriers between the receptor and the freeway, and installing newer electrostatic filters in adjacent receptor buildings.

The University CPU specifically addresses the potential for sensitive receptors to be exposed to mobile source emission through implementation of supplemental development regulations applicable to land adjacent to freeways. The freeway-adjacent supplemental development regulations require buildings with residential uses on a premises abutting a freeway right-of-way to not have exterior common open space within 30 feet from the property line abutting a freeway right-of-way. This regulation would avoid having usable outdoor open space areas located directly adjacent to the freeway with no buffers. Additionally, the University CPU includes the following policies for freeway-adjacent development which supports buffering between freeways and development:

- Buffer buildings adjacent to a freeway from the freeway with off-street parking or landscaping.
- Install ample landscaping adjacent to the freeway. This should include understory vegetation as well as trees.
- Orient freeway-adjacent buildings such that courtyards and residential units with operable windows and balconies face away from the freeway.
- Locate all residential units above the freeway elevation.
- Buffer residential development from noise with setbacks or elevation differences. Use noise-absorbing building materials and install double-paned windows. Incorporate landscaping materials, landscaped berms, and structural forms in wall design. Consider installation of sound walls where appropriate.
- Incorporate noise attenuation measures on all freeway-adjacent development.

Some measures listed above related to noise can also be supportive of reducing exposure to air pollutants, such as noise walls and other structural barriers. University CPU design guidelines would support architectural variability consistent with this recommendation. Additionally, the University CPU includes the following policies that addresses the future exposure of sensitive receptors to air pollution:

- Incorporate building features into new residential buildings located within 500 feet of the outside freeway travel lane to reduce the effects of air pollution.
- Mitigate against air pollution sources in the siting, design, and construction of residential units and other uses with sensitive receptors.

Recent CPUs, like the University CPU, have included policies which encourage special building features to be incorporated when buildings are located within 500 feet of freeways. As future CPUs

or other plan amendments are proposed, similar measures would be incorporated to ensure consistency with the General Plan policy framework including the Land Use and Community Planning Element Policy- LU-I.14 which states: "As part of community plan updates or amendments that involve land use or intensity changes, evaluate public health risks associated with identified sources of hazardous substances and toxic air emissions (see also Conservation Element, Section F). Create adequate distance separation, based on documents such as those recommended by the California Air Resources Board and site-specific analysis, between sensitive receptor land use designations and potential identified sources of hazardous substances such as freeways, industrial operations or areas such as warehouses, train depots, port facilities, etc. (See also Appendix C, EP-2)."

While CEQA documents should disclose potential health risks associated with siting near mobile source emissions, this alone would not be considered a significant impact unless the project were to substantially contribute or exacerbate conditions related to the TAC source.

Since the focus of the anticipated development in the Climate Smart Village Areas and the Hillcrest FPA area is residential and mixed-use development that would be associated with gasoline-fueled, electric, or hybrid vehicles (not diesel), these land uses would not have the potential to contribute to TAC associated with mobile sources. However, as future CPUs are proposed for consistency with the Village Climate Goal Propensity map, specific communities may contain industrial land uses that have the potential to be a source of diesel emissions. If industrial land uses are planned in proximity to sensitive land uses associated with future CPUs, a significant impact could occur. Typically, projects such as heavy industrial, warehousing, and distribution could potentially be sources of mobile source TACs. The Light Industrial land use designation in the University CPU area would allow a wide variety of industrial uses including light manufacturing, research and development uses, storage and distribution, and transportation terminals. While heavy industrial uses that have significant nuisance or hazardous effects are excluded from the University Light Industrial designation, the specific nature of future uses are not known at this program level of review and future individual projects within the University CPU area and other CPU areas could be associated with diesel emissions that could contribute to mobile source TACs.

At a program level of review and without the project-specific details associated with development within the Light Industrial designated areas within the University CPU area, impacts to sensitive receptors from mobile source TAC in University and within other communities with Industrial designated areas would be significant. Implementation of future residential and mixed-use development within the Climate Smart Village Areas and the Hillcrest FPA would be less than significant as these uses would not exacerbate mobile source TAC emissions due to the uses not being associated with diesel emissions. However, future development within industrial designated areas within the University CPU area, in addition to other areas of the City where land uses such as heavy industrial, warehousing, and distribution could affect sensitive receptors due to mobile source diesel emissions, would result in a significant impacts to sensitive receptors due to mobile source TAC.

## Issue 4: Odors

*Would the proposed project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

Emissions from construction equipment, such as diesel exhaust, and VOC from architectural coatings and paving activities may generate odors; however, these odors would be temporary and intermittent. Additionally, noxious odors would be confined to the immediate vicinity of construction equipment. Furthermore, short-term construction-related odors are expected to cease upon the drying or hardening of the odor-producing materials. Therefore, impacts associated with construction-generated odors would be less than significant. Common facilities that may generate objectionable odors during operation include wastewater treatment plants, landfills, and painting/coating operations (e.g., auto body shops), among others. The project would allow for increases in residential and mixed-use development within the Blueprint SD Climate Smart Village Areas, including the Hillcrest FPA area. Within University CPU area multi-family residential, office commercial, industrial park/-research and development, retail commercial, and visitor commercial land uses would increase.

The project is not anticipated to introduce land uses that would generate substantial odors adjacent to sensitive receptors. While specific, future developments within the project areas are not known at this program level of analysis, planned land uses would not encourage or support uses that would be associated with significant odor generation. Odors associated with restaurants or other commercial uses would be similar to existing residential and food service uses throughout the project areas. Additionally, auto body shops would be required to comply with SDAPCD Rule 51 (Public Nuisance), which prohibits the discharge of air contaminants or other materials that would be a nuisance or annoyance to the public. Odor generation is also generally confined to the immediate vicinity of the source and any proposed land uses that would generate odor would not be located in the vicinity of sensitive receptors. Although, implementation of the project is not anticipated to not create operational-related objectionable odors affecting a substantial number of people within the City; at a program level of review the specific details of individual projects are not known at this time; therefore, impacts related to objectionable odors would be significant.

## Cumulative Analysis

### a. Conflicts with Air Quality Plans

The cumulative study area associated with Issue 1 is the SDAB. The analysis provided under Issue 1 provides a discussion of consistency with the air quality plans for the SDAB (i.e., the RAQS and the SIP), and is a cumulative analysis by nature as it considers consistency of the proposed project with a regional air quality plan that relies on the land use plans of jurisdictions within the entire basin. As discussed under Issue 1, because implementation of the project could result in buildout which would be greater than what was accounted for in the most recent RAQS and SIP, the project would conflict with implementation of the RAQS and SIP and would have a significant cumulative impact related to conflicts with regional air quality plans.

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## **b. Air Quality Standards**

### ***Construction***

The analysis provided under Issue 2.a is cumulative by nature as it addresses the potential for several projects to be constructed simultaneously within the same project area, which could contribute to a cumulative air quality impact. As discussed under Issue 2.a, the simultaneous construction of projects within the same project area could exceed emission thresholds. While future projects would be required to adhere to existing regulations that limit emissions from equipment and architectural coatings and require best practices on the construction site to reduce air emissions, at this programmatic level of review, without project-specific development plans, cumulative construction impacts would be significant.

### ***Operation***

As discussed under Issue 2, buildout of multi-family residential and mixed-use projects under the project could result in emissions higher than what was used in the assumptions used to develop the RAQS and SIP. The project could result in increased operational emissions and higher density land uses are implemented over time. Thus, at this programmatic level of review, without project-specific development plans, cumulative impacts associated with operational emissions would be significant.

## **c. Sensitive Receptors**

### ***Localized Carbon Monoxide Hot Spots Impacts***

As discussed under Issue 3, implementation of the project is not anticipated to have the potential to result in CO hot spots. Furthermore, since CO hot spots are a localized phenomenon, development under the project would not result in a cumulatively significant contribution to any existing CO hot spot. Cumulative impacts would be less than significant.

### ***Toxic Air Emissions***

#### ***Construction***

As discussed under Issue 3, considering the highly dispersive nature of DPM and the fact that construction activities would occur intermittently and at various locations throughout the project areas, in addition to required compliance with SDAPCD air quality rules, the project is not anticipated to expose sensitive receptors to substantial DPM or other toxic contaminant concentrations that could increase cancer risk. The project would not result in a cumulatively considerable contribution to a construction-related health risk impact. Cumulative impacts would be less than significant.

#### ***Stationary Sources***

Also discussed under Issue 3, the proposed project would facilitate the future construction of multi-family residential and mixed-use development throughout the project areas. Land uses such as dry



cleaners, gas stations and other stationary sources could also be proposed within the project areas, which represent sources of TACs. However, impacts related to stationary source emissions would be localized, as it is the stationary sources' effect on nearby sensitive receptors that results in the impact. Compliance with SDAPCD permits and SDAPCD permit conditions and rules would ensure that and would not contribute to a cumulative impact due to required compliance with SDAPCD permits and SDAPCD permit conditions and rules. Therefore, the project would not result in a cumulatively considerable contribution to a stationary source-related health risk impact within the SDAB. Cumulative impacts would be less than significant.

### **Mobile Sources**

As discussed under Issue 3, the ~~proposed~~ project would not exacerbate TACs related to mobile source emissions because the project would accommodate anticipated growth in the region and would ensure that growth is located in places that would support a shift in mode share toward non-vehicular options, which would ultimately support reductions in mobile source emissions. Further, implementation of the project would provide infill, high-density multi-family residential development, and transit-oriented development that is intended to benefit regional air quality. Implementation of the project could result in a significant impact related to exposure of sensitive receptors to mobile source emissions. However, these impacts are localized and would pertain to potential exposure to contaminants at a specific location. Therefore, future projects would not result in a cumulatively considerable contribution to mobile source air emissions and associated health impacts. Cumulative impacts would be less than significant.

### **d. Odors**

Impacts related to odors are localized and would not combine to result in a significant cumulative impact. Cumulative impacts would be less than significant.

## **4.2.5 Significance of Impacts**

### **4.2.5.1 Conflicts with Air Quality Plans**

Implementation of the University CPU and Hillcrest FPA would result in greater density; therefore, future emissions associated with buildout of the FPA and the CPU areas would be greater than future emissions associated with buildout of the adopted Community Plan land uses. Additionally, if land uses increase in other areas of the City as a result of implementation of the Village Climate Goal Propensity map, impacts of those future land use amendments would be significant. Thus, emissions of ozone precursors (VOC and NO<sub>x</sub>) would be greater than what is accounted for in the RAQs and impacts would be significant.

### **4.2.5.2 Air Quality Standards**

The project includes planning level actions that do not propose any physical development at this time. Adoption of the Blueprint SD Initiative, the University CPU, Hillcrest FPA, future LDC amendments, CPUs, and plan amendments would not result in impacts related to air quality standards during construction or operation because they are not associated with any physical

development. However, project implementation anticipates future development would occur consistent with adopted planning documents and LDC amendments. Future development projects would involve construction and operational emissions, which could exceed air quality standards. Therefore, at a program level of review impacts would be significant.

#### 4.2.5.3 Sensitive Receptors

Impacts associated with the exposure of sensitive receptors to carbon monoxide hot spots and toxic air emissions resulting from construction would be less than significant. Future development of residential land uses consistent with the Blueprint SD Initiative, the Hillcrest FPA, and University CPU would not be sources of stationary or mobile source TACs; therefore, impacts related to these land uses would be less than significant. However, future development of light industrial land uses or commercial land uses that involve stationary source emissions could result in significant impact to sensitive receptors. Additionally, future development within industrial designated areas within the University CPU area, in addition to other areas of the City where land uses such as heavy industrial, warehousing, and distribution could affect sensitive receptors due to mobile source diesel emissions; would result in a significant impacts to sensitive receptors due to mobile source TAC.

#### 4.2.5.4 Odors

Impacts associated with the exposure of sensitive receptors to substantial odors would be significant at a program level of review.

### 4.2.6 Mitigation, Monitoring and Reporting

Mitigation measures are provided at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific projects are proposed. Portions of the referenced mitigation measures refer to City, State and APCD regulations and plans that have incorporated detailed performance standards and are fully enforceable through permit conditions or other legally binding instruments. Other portions of the mitigation measures, where noted, would apply during future discretionary reviews by the City. The following mitigation framework provides a program-level framework for reducing significant impacts related to air quality.

#### 4.2.6.1 Conflicts with Air Quality Plan

No mitigation is proposed for this significant impact as the City regularly provides updates to SANDAG about any changes to the City's land use map that could affect housing and employment forecasts. After project approval and after certification of the Final PEIR, the City would provide a revised land use map and housing and employment forecast for the University and Uptown community plan areas to SANDAG to ensure that any revisions to the population and employment projections used by the SDAPCD in updating the RAQS and SIP accurately reflect anticipated growth due to the project. Additionally, as future plan amendments are proposed for consistency with the Village Climate Goal Propensity map, similar updates would be provided to SANDAG to ensure the RAQS and SIP are consistent with growth projections detailed in City planning documents.

## 4.2.6.2 Air Quality Standards

### MM-AQ-1 Air Emissions

Future ministerial and discretionary projects shall comply with all applicable regulations pertaining to air quality including but not limited to SDAPCD Rule 20 through 20.8, Rule 50, Rule 51, Rule 52, Rule 55, and Rule 67.1.

Construction and operation of individual discretionary development projects shall not exceed criteria pollutant significance thresholds detailed in the latest City's CEQA Significance Thresholds.

If an individual project is found to have the potential to exceed emission thresholds due to operational emissions, the following are example measures that could be implemented to reduce emissions to below a level of significance:

- ~~demonstrate net zero energy expenditure,~~
- ~~Implementation of transportation demand management measures.~~
- ~~Prohibit the installation of woodstoves, hearths, and fireplaces in new construction facilitated by the proposed project.~~
- ~~Expand and facilitate completion of planned networks of active transportation infrastructure.~~
- ~~Implement electric vehicle charging infrastructure beyond requirements set forth in the 2022 California Green Building Standards Code mandatory measures, such as Tier 2 voluntary measures set forth in the 2022 California Green Building Standards Code (or future more stringent) standards.~~
- ~~Implement traffic demand measures, such as unbundling parking fees from rent/lease options, encouraging/developing a ride-share program for the community, and provide car/bike sharing services, that will reduce daily individual car usage and reduce project vehicle miles traveled.~~

If an individual project is found to have the potential to exceed emission thresholds due to construction emissions, the following are example measures that could be implemented during construction to reduce emissions to below a level of significance:

- ~~Equipment meeting USEPA Tier IV emission standards and/or alternative fueled construction equipment, as feasibly available.~~
- ~~Use architectural coating materials, as defined in SDAPCD Rule 67.0.1, that are zero-~~emission~~ or have a low VOC content (below 10 grams per liter). Where such VOC coatings are not available or feasible, the coating with the lowest VOC rating available shall be used.~~
- ~~Additional dust control measures for construction sites to minimize fugitive dust including:
 
  - ~~Contractor(s) shall implement paving, chip sealing, or chemical stabilization of internal roadways after completion of grading;~~
  - ~~Dirt storage piles shall be stabilized by chemical binders, tarps, fencing, or other erosion control;~~
  - ~~Enforce a 15-mile-per-hour speed limit on unpaved surfaces;~~~~

- ~~Dirt and debris spilled onto paved surfaces shall be swept up immediately to reduce resuspension of particulate matter caused by vehicle movement. Approach routes to construction sites shall be cleaned daily of construction-related dirt in dry weather;~~
- ~~Haul trucks hauling dirt, sand, soil, or other loose materials shall be covered or 2 feet of freeboard shall be maintained;~~
- ~~Grading shall be terminated if winds exceed 25 miles per hour;~~
- ~~Any blasting areas shall be wetted down prior to initiating the blast.~~

### 4.2.6.3 Sensitive Receptors

#### MM-AQ-2 Sensitive Receptors

Future projects consistent with the project that would involve stationary source emissions subject to APCD permitting shall be required to obtain applicable APCD permits and demonstrate consistency with all permit conditions and APCD rules consistent with SDAPCD's Title V Operating Permit Program which implements Title V of the Federal Clean Air Act.

Future discretionary development that involves heavy industrial land uses such as warehousing and distribution or other land uses that would involve substantial sources of mobile source diesel emissions shall be required to prepare a health risk assessment (HRA) in accordance with SDAPCD HRA Guidelines and the OEHHA Air Toxics "Hot Spots" Program Risk Assessment Guidelines (~~APCD 2006~~; OEHHA ~~2015~~2022). The HRA shall include calculation of the excess cancer risk and the non-cancer chronic and acute health hazard index for the maximally exposed individual resident, and the maximally exposed individual worker. The HRA shall identify best available control technology required to reduce risk to less than 10 in 1,000,000.

### 4.2.6.4 Odors

#### MM-AQ-3 Odors

Future discretionary projects with the potential to result in objectionable odors shall be required to demonstrate compliance with SDAPCD Rule 51 (Public Nuisance), which prohibits the discharge of air contaminants or other materials that would be a nuisance or annoyance to the public. Additionally, application of SDMC Section 142.0710 prohibits odors to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located, where it endangers human health, causes damage to vegetation or property, or causes soiling.

## 4.2.7 Significance after Mitigation

### 4.2.7.1 Conflicts with Air Quality Plans

Implementation of the University CPU and Hillcrest FPA would result in adoption of land use plans that would not be consistent with the currently adopted RAQS and SIP. Similarly, future CPUs anticipated to be adopted consistent with the Blueprint SD Initiative would not be consistent with the RAQS or SIP if land use intensities increase. This would result in a significant and unavoidable impact. The City will provide a revised land use map to SANDAG after adoption of ~~these~~

~~amendments~~the University CPU and Hillcrest FPA, and any future CPU or community plan amendment, to ensure that any revisions to the population and employment projections are considered in the update of the RAQS and the SIP. The provision of housing information would assist SANDAG in revising the population forecasts; however, until the anticipated growth is included in the emission estimates of the RAQS and the SIP, the direct and cumulative impacts would remain significant.

### 4.2.7.2 Air Quality Standards

#### a. Construction

Federal, State, and local regulations would provide a framework for developing project-level air quality protection measures for future projects and implementation of mitigation measure MM-AQ-1 would reduce construction-related air quality impacts for future development anticipated under the project. Nevertheless, the ability of future development to reduce all impacts to less than significant after the ~~implementation of analysis required by~~ MM-AQ-1 ~~is implemented~~ cannot be guaranteed at a program level of review due to project-specific development plans being unknown at this time and due to ministerial projects that would not be subject to detailed air quality evaluation. Thus, impacts to air quality standards ~~are considered to~~ would be significant.

#### b. Operation

The regulations at the federal, state, and local levels provide a framework for developing project level air quality protection measures for future projects. The City's process for evaluating discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan and associated Community Plan. However, it is possible that for certain projects, adherence to the regulations may not adequately protect air quality, and such projects would require additional measures to avoid or reduce significant air quality impacts. After implementation of MM-AQ-1, impacts would remain significant ~~because~~ operational emissions associated with development anticipated under the project would be greater for all pollutants when compared to adopted land uses and the assumptions used to develop the RAQS, because ministerial projects would not be subject to a detailed air quality evaluation, and because it cannot be known whether certain projects would be able to reduce emissions below the significance thresholds, ~~this impact would be significant~~.

### 4.2.7.3 Sensitive Receptors

Implementation of the project is not anticipated to result in significant impacts to sensitive receptors. ~~with~~ implementation of MM-AQ-2 is anticipated to be sufficient to reduce significant impacts; ~~however,~~ a requirement for a HRA would not apply to ministerial projects and at a program level of review, the specific details of individual projects and the feasibility of MM-AQ-2 to fully mitigate all potential impacts are not known; therefore, impacts related to sensitive receptors would remain significant after mitigation.

#### 4.2.7.4 Odors

Implementation of the project is not anticipated to create operational-related objectionable odors affecting a substantial number of people within the City with implementation of MM-AQ-3 to discretionary projects. However, ministerial projects would not be subject to a detailed odor evaluation and at a program level of review, the specific details of individual projects and the feasibility of MM-AQ-3 to fully mitigate all potential impacts are not known; therefore, impacts related to objectionable odors would remain significant after mitigation.

## 4.3 Biological Resources

This section analyzes potentially significant impacts related to biological resources that could result from the implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (CPU) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

This analysis relies on secondary source information, existing biological resources databases and literature, vegetation data available from the SANGIS Regional Geographic Information Systems (GIS) Data Warehouse and the Biological Resources Report prepared by Busby Biological Services for the University CPU area (Appendix D). Within the analysis, separate discussions for each project component are provided, as needed, to characterize the existing conditions and analysis relative to each project component.

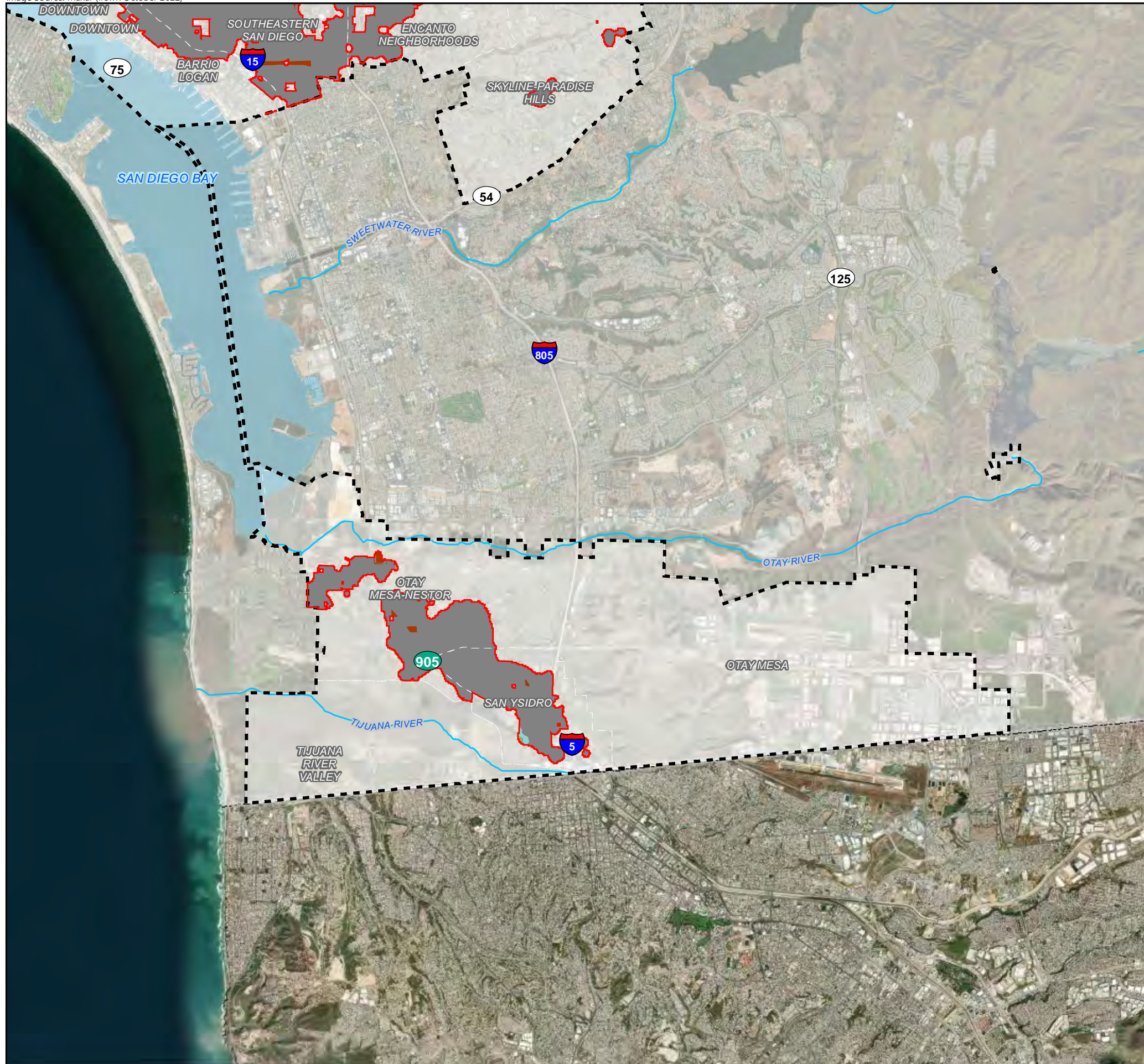
### 4.3.1 Existing Conditions

#### 4.3.1.1 Vegetation Communities

##### a. Blueprint SD Initiative

The Blueprint SD Initiative’s policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. However, it is anticipated that potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas as it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas based on the location of these areas being focused largely within existing developed and urbanized areas. Therefore, the analysis in this section focuses on the biological resources present within the Blueprint SD Initiative’s Climate Smart Village Areas. Table 4.3-1 and Figures 4.3-1a through 4.3-1e show the vegetation communities and land cover types found within the Blueprint SD Initiative’s Climate Smart Village Areas based on generalized vegetation data. Actual vegetation communities and land cover types would require site specific surveys and verification. Approximately 95 percent of the Climate Smart Village Areas are located within land cover types not considered sensitive, which includes disturbed habitat, urban/developed land, agricultural land, and eucalyptus woodland. Although agriculture is not a sensitive vegetation community, it can support biological resources and could transition to non-native grassland if left fallow. Within the Climate Smart Village Areas, approximately 3.5 percent (853 acres) are mapped as sensitive upland habitats and approximately 1.3 percent (331 acres) are mapped as a wetland vegetation community.





- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Vegetation Communities and Land Cover Types**
- Disturbed Land
- Urban/Developed
- Intensive Agriculture
- Extensive Agriculture
- Southern Riparian Scrub
- Saltpan/Mudflats

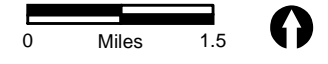
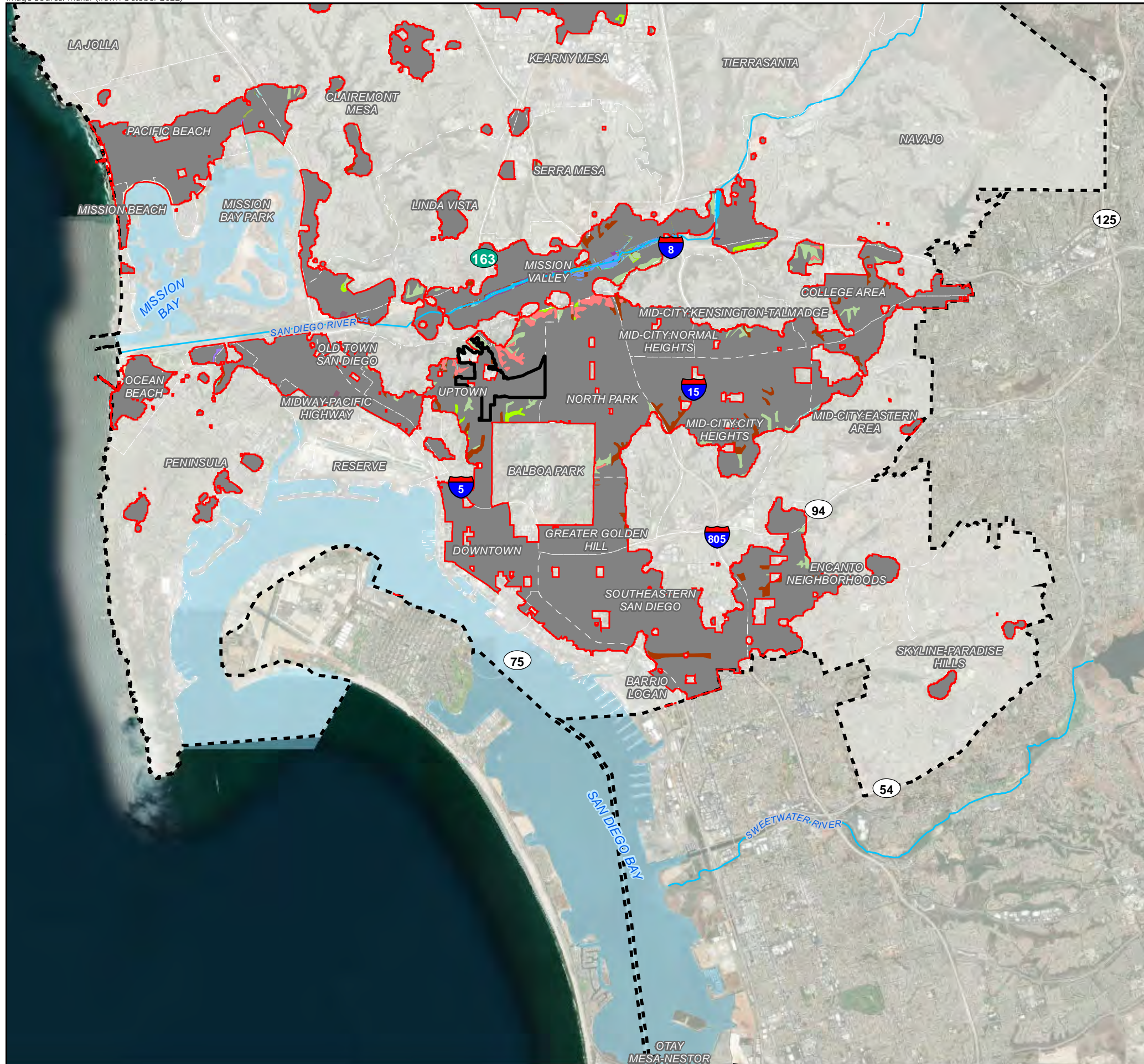


FIGURE 4.3-1a  
Vegetation Communities and Land Cover Types  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South





- Hillcrest Focused Plan Amendment Area
  - Blueprint SD Initiative Climate Smart Village Areas
  - San Diego City Limits
- Vegetation Communities and Land Cover Types**
- Disturbed Wetland
  - Disturbed Land
  - Urban/Developed
  - Intensive Agriculture
  - Diegan Coastal Sage Scrub
  - Chaparral
  - Valley and Foothill Grassland
  - Valley Needlegrass Grassland
  - Non-Native Grassland
  - Southern Coastal Salt Marsh
  - Coastal and Valley Freshwater Marsh
  - Riparian and Bottomland Habitat
  - Southern Riparian Forest
  - Southern Coast Live Oak Riparian Forest
  - Southern Cottonwood-willow Riparian Forest
  - Southern Riparian Scrub
  - Subtidal
  - Shallow Bay
  - Estuarine
  - Fresh Water
  - Non-Vegetated Channel or Floodway
  - Beach
  - Eucalyptus Woodland

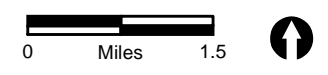
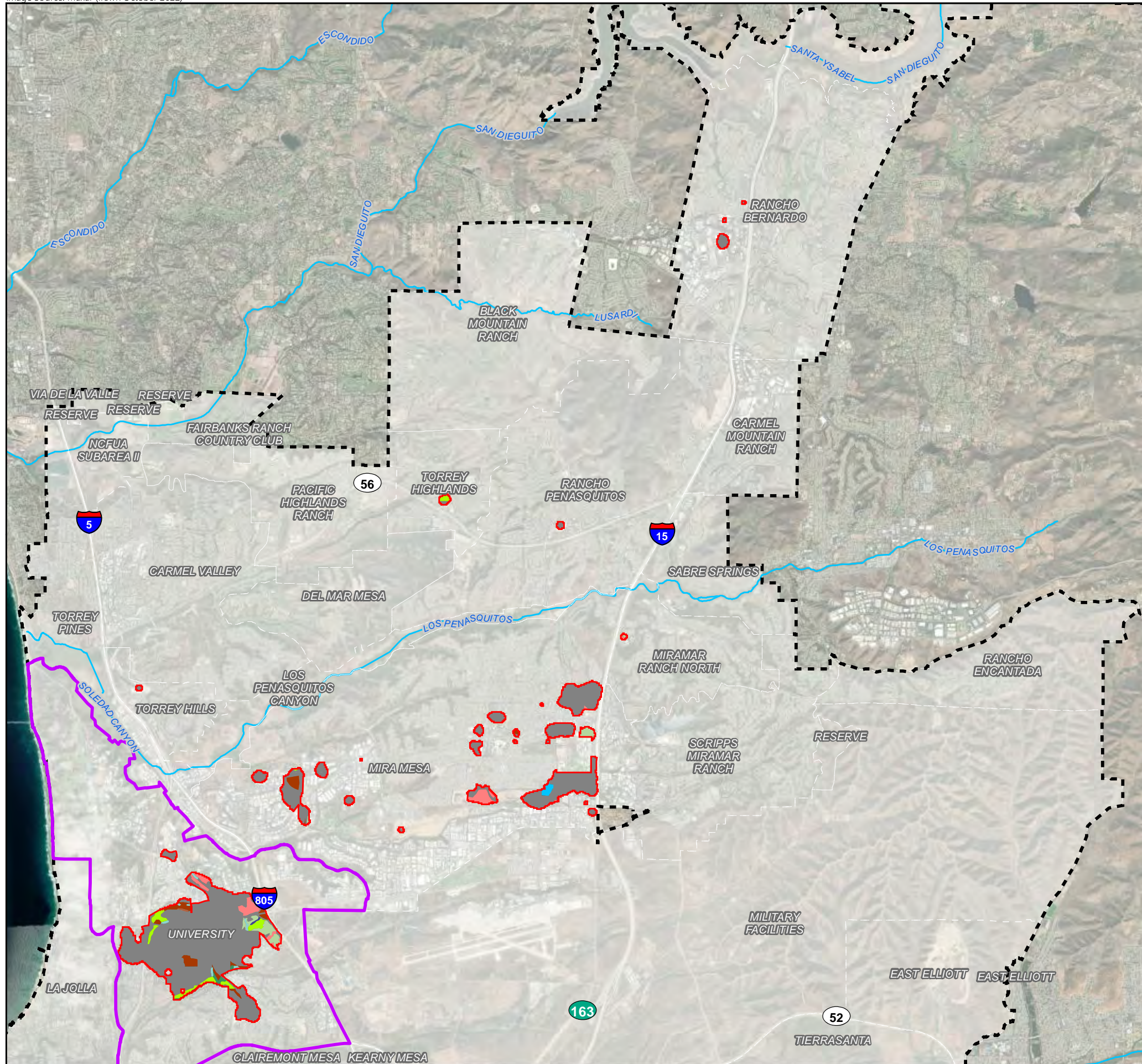


FIGURE 4.3-1b  
Vegetation Communities and Land Cover Types  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South Central









- University Community Plan Update Area
  - Blueprint SD Initiative Climate Smart Village Areas
  - San Diego City Limits
- Vegetation Communities and Land Cover Types**
- Disturbed Wetland
  - Disturbed Land
  - Urban/Developed
  - Diegan Coastal Sage Scrub
  - Chaparral
  - Valley and Foothill Grassland
  - Southern Sycamore-alder Riparian Woodland
  - Southern Riparian Scrub
  - Fresh Water
  - Eucalyptus Woodland

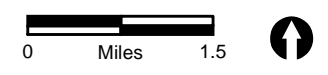
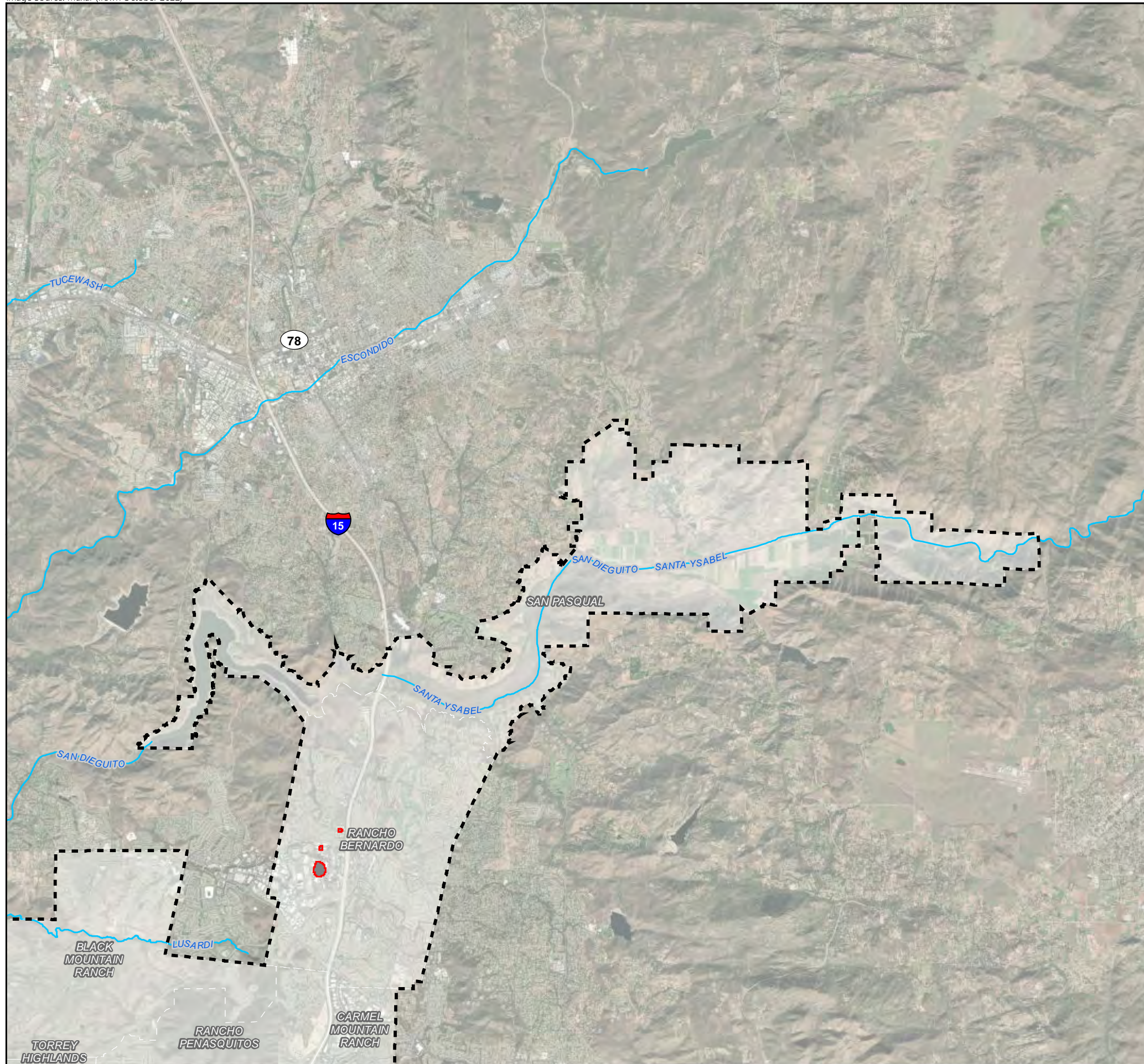


FIGURE 4.3-1d  
Vegetation Communities and Land Cover Types  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North





- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Vegetation Communities and Land Cover Types**
- Urban/Developed
- Diegan Coastal Sage Scrub

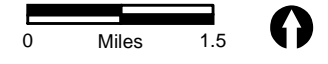


FIGURE 4.3-1e  
Vegetation Communities and Land Cover Types  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - Northeast



## b. Hillcrest Focused Plan Amendment

Table 4.3-1 and Figure 4.3-2 show the vegetation communities and land cover types mapped within the Hillcrest FPA area. As shown, approximately 98 percent (380 acres) of the Hillcrest FPA area is classified as disturbed or developed and includes urban/developed, disturbed, and eucalyptus woodland land cover types. Approximately 2 percent (9 acres) is classified as upland vegetation. These upland areas are located along the edges of the Hillcrest FPA area, adjacent to canyon edges.

## c. University Community Plan Update

Table 4.3-1 and Figure 4.3-3 show the vegetation communities and land cover types mapped within the University CPU area. As shown, approximately 68 percent (5,913 acres) of the CPU area is classified as disturbed or developed and includes urban/developed, disturbed land, agriculture, and eucalyptus woodland land cover types. Approximately 29 percent (2,527 acres) is classified as upland vegetation communities and approximately 3 percent (236 acres) is classified as wetland vegetation communities.

	Acres		
	Blueprint SD Initiative Climate Smart Village Areas	Hillcrest FPA Area	University CPU Area
<b>Upland Vegetation Communities</b>			
Diegan Coastal Sage Scrub	454	4	596
Non-Native Grassland	<1	0	111
Chaparral/ Southern Mixed Chaparral	255	4	354
Chamise Chaparral	0	0	45
Maritime Succulent Scrub	0	0	446
Scrub Oak Chaparral	0	0	7
Southern Coastal Bluff Scrub	0	0	98
Southern Maritime Chaparral	0	0	255
Torrey Pines Forest	0	0	105
Valley and Foothill Grassland/ Valley Needlegrass Grassland	143	1	509
<b>Total Uplands</b>	<b>853</b>	<b>9</b>	<b>2,527</b>
	Acres		
	Blueprint SD Initiative Climate Smart Village Areas	Hillcrest FPA Area	University CPU Area
<b>Wetland Vegetation Communities</b>			
Disturbed Wetland	8	0	3
Southern Coastal Salt Marsh	12	0	13
Coastal and Valley Freshwater Marsh	24	0	<1
Freshwater Seep	0	0	1
Southern Riparian Forest	2	0	18
Southern Coast Live Oak Riparian Forest	0	0	7
Southern Cottonwood-Willow Riparian Forest	78	0	0
Southern Sycamore-Alder Riparian Woodland	12	0	89
Southern Riparian Scrub	66	0	57
Southern Willow Scrub	0	0	<1

<b>Table 4.3-1 Vegetation Communities and Land Cover Types</b>			
Subtidal	6	0	4
Shallow Bay	7	0	0
Estuarine	6	0	0
Freshwater	80	0	0
Vernal Pools	0	0	1 <sup>1</sup>
Non-Vegetated Channel or Floodway	3	0	1
Beach	28	0	44
<b>Total Wetlands</b>	<b>331</b>	<b>0</b>	<b>236</b>
	Acres		
	Blueprint SD Initiative Climate Smart Village Areas	Hillcrest FPA Area	University CPU Area
Disturbed/Developed Land Cover Types			
Disturbed Land	456	6	367
Urban/Developed	23,239	366	5,451
Agriculture	16	0	0
Eucalyptus Woodland	15	<1	95
<b>Total Disturbed/ Developed Land Cover Type</b>	<b>23,726</b>	<b>380</b>	<b>5,913</b>
Notes:			
Acreages are approximate based on generalized data and may not add due to rounding. Focused surveys would be required to verify resources.			
<sup>1</sup> Vernal pool acreages are estimates. Locations of vernal pool resources within the University CPU area are depicted in more detail on Figures 7a and 7b of Appendix D.			

### 4.3.1.2 Vegetation Community Descriptions

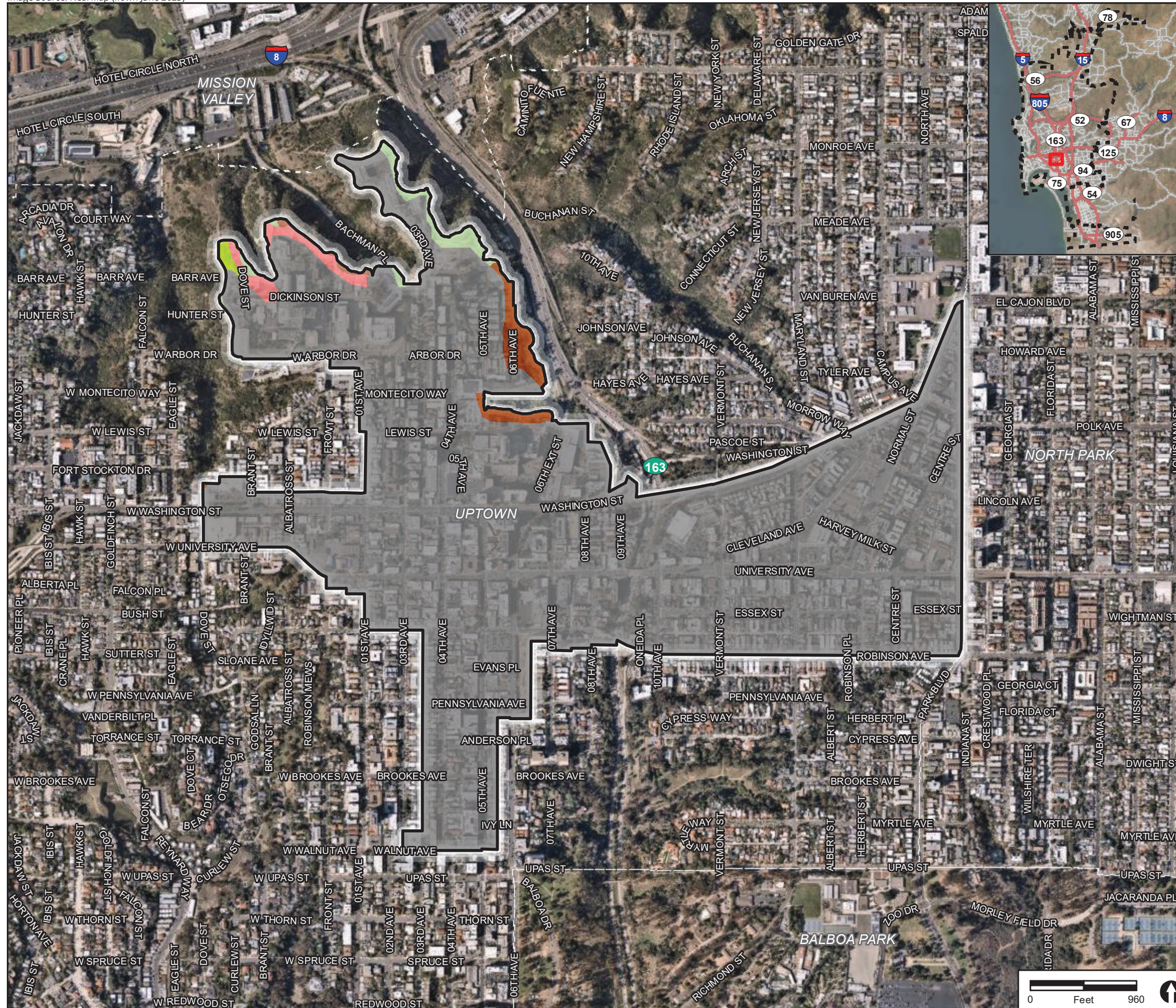
The vegetation communities and land cover types listed in the preceding sections are described below. A discussion of habitat tiers and vegetation communities as defined by the City's Biology Guidelines (2018) is provided in Section 4.3.2.3b, below.

#### a. Upland Vegetation Communities

##### ***Diegan Coastal Sage Scrub***

Diegan coastal sage scrub consists mainly of low, soft-woody sub-shrubs (approximately three feet high) that are most actively growing in winter and early spring. Many taxa are facultatively drought-deciduous. Stem- and leaf-succulents are also often present but are usually not conspicuously dominant species. This association is typically found on dry sites, such as steep, south-facing slopes or clay-rich soils that are slow to release stored water. Dominant shrub species in this vegetation type may vary, depending on local site factors and levels of disturbance, but often include a variable mix of California sagebrush, California buckwheat (*Eriogonum fasciculatum* var. *fasciculatum*), black sage (*Salvia mellifera*), laurel sumac (*Malosma laurina*), deerweed (*Acmispon glaber*), broom baccharis (*Baccharis sarothroides*), coyote brush (*Baccharis pilularis*), California sunflower, and occasionally live-forevers (*Dudleya* spp.), San Diego barrel cactus, and needlegrass (*Stipa* spp.). Diegan coastal sage scrub is categorized as a Tier II habitat as defined by the City's Biology Guidelines (2018).

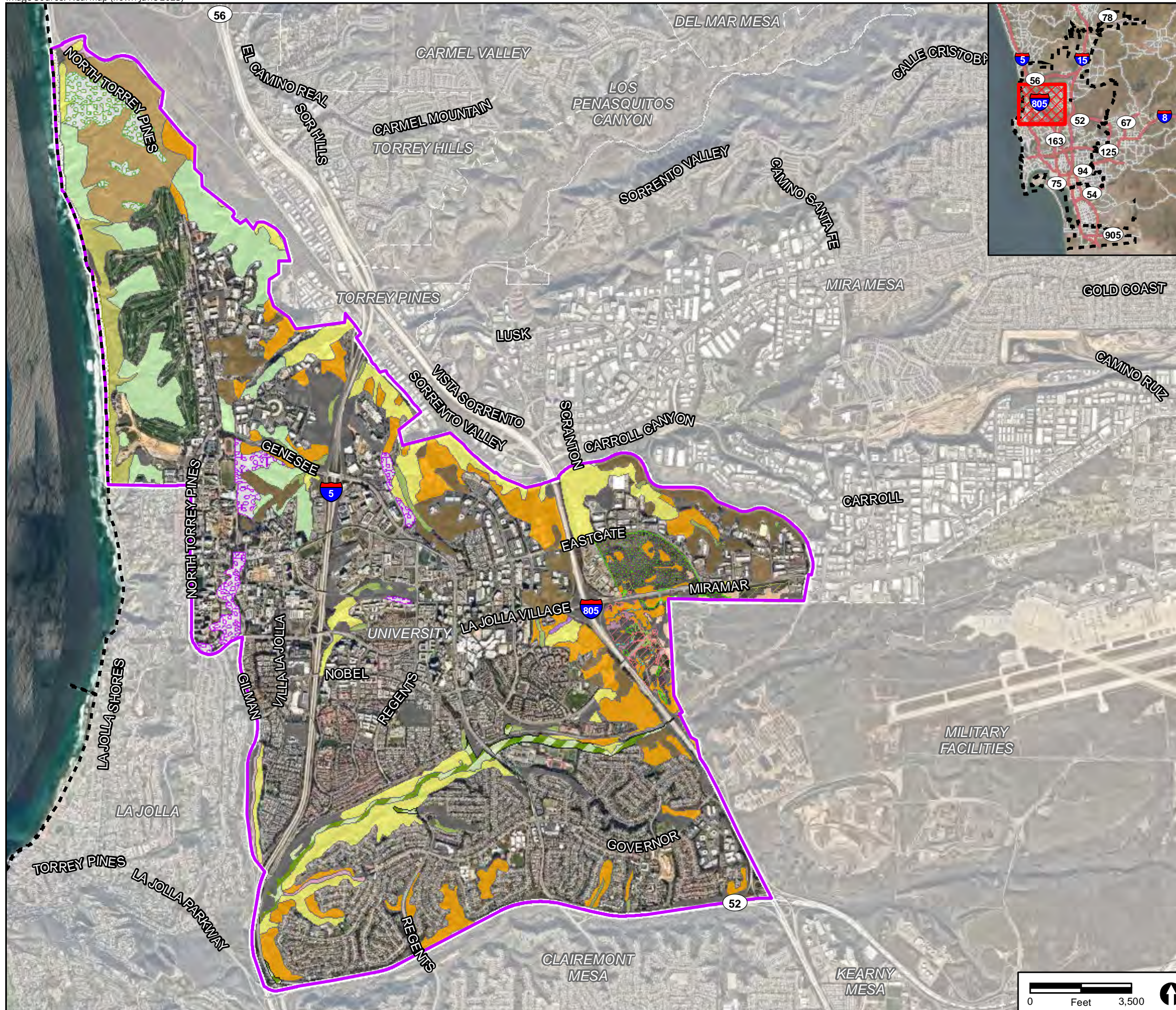




- Hillcrest Focused Plan Amendment Area
- Vegetation Communities**
- Disturbed Land
- Urban/Developed
- Diegan Coastal Sage Scrub
- Chaparral
- Valley and Foothill Grassland
- Eucalyptus Woodland

FIGURE 4.3-2  
Vegetation Communities and Land Cover  
Types in Relation to Hillcrest Focused  
Plan Amendment Area





- University Community Plan Update Area
- San Diego City Limits
- Vegetation Communities and Land Cover Types**
- 11200 Disturbed Wetland
- 11300 Disturbed Habitat
- 12000 Urban/Developed
- 31200 Southern Coastal Bluff Scrub
- 32400 Maritime Succulent Scrub
- 32500 Diegan Coastal Sage Scrub
- 37000 Chaparral
- 37120 Southern Mixed Chaparral
- 37C30 Southern Maritime Chaparral
- 37200 Chamise Chaparral
- 37900 Scrub Oak Chaparral
- 42000 Valley and Foothill Grassland
- 42110 Valley Needlegrass Grassland
- 42200 Non-Native Grassland
- 45400 Fresh Water Seep
- 52410 Coastal and Valley Freshwater Marsh
- 52120 Southern Coastal Salt Marsh
- 61300 Southern Riparian Forest
- 61310 Southern Coast Live Oak Riparian Forest
- 62400 Southern Sycamore-Alder Riparian Woodland
- 63300 Southern Riparian Scrub
- 64400 Beach
- 64200 Non-Vegetated Channel or Floodway
- 79100 Eucalyptus Woodland
- 83140 Torrey Pine Forest

**FIGURE 4.3-3**  
Vegetation Communities and Land Cover Types  
in Relation to the  
University Community Plan Update Area



Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas based on the location of these areas being focused largely within existing developed and urbanized areas. The distribution of Diegan Coastal Sage Scrub in relation to the Climate Smart Village Areas is shown on Figures 4.3-1a through 4.3-1e. There are approximately 454 acres of mapped Diegan Coastal Sage Scrub located in Miramar Ranch North, Mira Mesa, University, Clairemont Mesa, Kearny Mesa, Pacific Beach, Linda Vista, Mission Valley, Uptown, College Area, Mid-City: Kensington-Talmadge, Rancho Bernardo, Serra Mesa, Mid-City: City Heights, Old Town San Diego, Mid-City: Eastern Area, Mid-City: Normal Heights, North Park, Balboa Park, Navajo, and the Encanto Neighborhoods. Within the Hillcrest FPA area, there are approximately 4 acres of mapped Diegan coastal sage scrub located in the northern portion of the Hillcrest FPA area both east and west of Third Avenue (see Figure 4.3-2).

Within the University CPU area, there are approximately 596 acres of Diegan coastal sage scrub. Diegan coastal sage scrub occurs in many locations within the University CPU area along the eastern and southern boundaries and on either side of ~~Genesse~~ Genesee Avenue (see Figure 4.3-3).

### ***Non-Native Grassland***

Non-native grassland is characterized by a dense to sparse cover of annual grasses, often with showy-flowered native and non-native annual forbs. This vegetation community generally occurs on fine-textured loam or clay soils that are moist or even waterlogged during the winter rainy season and very dry during the summer and fall. This habitat is a disturbance-related community most often found in old agricultural fields or openings in native scrub habitats; it has replaced native grassland and coastal sage scrub at many localities throughout southern California. Typical non-native grasses found within this vegetation community include red brome (*Bromus rubens*), ripgut grass, wild oat (*Avena barbata*), and soft chess (*Bromus hordeaceus*). Characteristic forbs include red-stem filaree (*Erodium cicutarium*), mustard (*Brassica* spp.), tar plant (*Deinandra* spp.), and goldfields (*Lasthenia* spp.). Non-native grassland is categorized as a Tier IIIB habitat as defined by the City's Biology Guidelines (2018).

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas based on the location of these areas being focused largely within existing developed and urbanized areas. The Climate Smart Village Areas contain approximately less than one acre of non-native grassland located in Uptown. There is no non-native grassland in the Hillcrest FPA area. Within the University CPU area there are approximately 111 acres of non-native grassland. Non-native grassland occurs mixed with Diegan coastal sage scrub along Miramar Road in the eastern portion of the University CPU area (see Figure 4.3-3).

### **Chaparral/Southern Mixed Chaparral**

Chaparral is a broad-scale vegetation community category and, in San Diego, typically refers to southern mixed chaparral. Southern mixed chaparral is composed of broad-leaved sclerophyll shrubs that grow to between five and ten feet in height. It occurs on dry, rocky, steep, north-facing slopes with little soil and moderate temperatures. This vegetation community type typically has high species diversity but is dominated by ceanothus species. In San Diego County, mixed chaparral is usually dominated by Ramona lilac (*Ceanothus tomentosus* var. *olivaceous*) but may also include other ceanothus species, such as chaparral whitethorn (*C. leucodermis*); however, the presence of other ceanothus species typically indicates other chaparral types. In addition to ceanothus, other species often associated with this vegetation community include chamise (*Adenostoma fasciculatum*), Eastwood's manzanita (*Arctostaphylos glandulosa*), toyon (*Heteromeles arbutifolia*), Nuttall's scrub oak (*Quercus dumosa*), laurel sumac, lemonadeberry (*Rhus integrifolia*), spiny redberry (*Rhamnus crocea*), and yucca species (*Yucca* spp.). Chaparral is considered a Tier IIIA vegetation community and southern mixed chaparral is considered a Tier IIA vegetation community according to the City's Biology Guidelines (2018).

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 255 acres of chaparral/southern mixed chaparral located in Clairemont Mesa, College Area, Kearny Mesa, Mid-City: Normal Heights, Mira Mesa, Miramar Ranch North, Mission Valley, North Park, Serra Mesa, University, and Uptown. Within the Hillcrest FPA area, there are approximately 4 acres of chaparral located along canyon edges in the northwestern portion of the Hillcrest FPA area (see Figure 4.3-2). Within the University CPU area, there are approximately 354 acres of chaparral/southern mixed chaparral. Chaparral primarily occurs scattered through the eastern portion of the University CPU area (see Figure 4.3-3).

### **Chamise Chaparral**

Chamise chaparral is a chaparral community ranging from about three to nine feet in height and overwhelmingly dominated by chamise. Other shrub species, such as black sage, mission manzanita (*Xylococcus bicolor*), laurel sumac, and felt-leaved yerba santa (*Eriodictyon crassifolium*), may be present but typically contribute little to the overall cover. Mature stands of chamise chaparral have a dense overstory with very little herbaceous understory or leaf litter. Chamise chaparral is categorized as a Tier IIIA habitat as defined by the City's Biology Guidelines (2018). There is no chamise chaparral within the Climate Smart Village Areas or the Hillcrest FPA area. Within the University CPU area, there are approximately 45 acres of chamise chaparral. Chamise chaparral occurs in the eastern portion of the University CPU area, east of Interstate (I) 805, primarily south of Miramar Road (see Figure 4.3-3).

### **Maritime Succulent Scrub**

Maritime succulent scrub is a low-growing (one- to three-foot high), open scrub community that is dominated by drought deciduous, woody shrubs and a diverse mixture of stem and leaf succulents, often with a high proportion of cacti. This vegetation community grows on thin, rocky, or sandy soils, often on steep slopes along coastal bluffs. Typical species within maritime succulent scrub include Shaw's agave (*Agave shawii*), California sagebrush (*Artemisia californica*), bush sunflower (*Encelia californica*), cliff spurge (*Euphorbia misera*), San Diego barrel cactus (*Ferocactus viridescens*), California box thorn (*Lycium californicum*), prickly pear (*Opuntia littoralis*), lemonadeberry, and San Diego sunflower (*Bahiopsis laciniata*); the areas between these species is usually bare. Maritime succulent scrub is classified as a Tier I habitat as defined by the City's Biology Guidelines (2018).

There is no maritime succulent scrub within the Climate Smart Village Areas or the Hillcrest FPA area. Within the University CPU area, there are approximately 446 acres of maritime succulent scrub. Maritime succulent scrub occurs in the northern half of the University CPU area west of I-5 (see Figure 4.3-3).

### **Scrub Oak Chaparral**

Scrub oak chaparral is a dense, evergreen chaparral association that grows to 20 feet in height and is dominated by Nuttall's scrub oak and/or oak hybrids such as *Quercus xacutidens*. This habitat occurs on more mesic sites (such as east and north facing slopes and ravines) than the other chaparral associations and often at slightly higher elevations. These more favorable sites often allow scrub oak chaparral to recover from fire more quickly than other chaparral types. Additional shrub species found in scrub oak chaparral include chamise, mission manzanita, and bushrue. Scrub oak chaparral is classified as a Tier I habitat as defined by the City's Biology Guidelines (2018).

There is no scrub oak chaparral within the Climate Smart Village Areas or the Hillcrest FPA area. Within the University CPU area, there are approximately 7 acres of scrub oak chaparral. Scrub oak chaparral occurs in the eastern portion of the University CPU area, east of I-805, south of Miramar Road, and west of Marine Corps Air Station Miramar (see Figure 4.3-3).

### **Southern Coastal Bluff Scrub**

Southern coastal bluff scrub is a low-growing scrub community that grows in exposed, windy areas on rocky, poorly developed soils and is dominated by woody and/or succulent species that are typically less than seven feet in height. This vegetation community can either form a continuous, closed canopy or can be more scattered. Typical shrubs that occur within southern coastal bluff scrub include salt bush (*Atriplex* spp.), California sunflower (*Encelia californica*), prickly pear (*Opuntia littoralis*), and lemonadeberry (*Rhus integrifolia*) with an understory of morning glory (*Calystegia macrostegia* ssp.), Indian paintbrush (*Castilleja affinis* ssp.), sea dahlia (*Coreopsis maritima*), dudleya (*Dudleya* spp.), and wild cucumber (*Marah macrocarpa*). Southern coastal bluff scrub is classified as a Tier I habitat as defined by the City's Biology Guidelines (2018).

There is no southern coastal bluff scrub within the Climate Smart Village Areas or the Hillcrest FPA area. Within the University CPU area, there are approximately 98 acres of southern coastal bluff scrub. Southern coastal bluff scrub occurs along the northwestern border of the University CPU

area, within Torrey Pines State Natural Reserve and adjacent to Torrey Pines Golf Course (see Figure 4.3-3).

### ***Southern Maritime Chaparral***

Southern maritime chaparral is a low, fairly open chaparral community that grows on weathered sands within the coastal fog belt. It is typically dominated by wart-stemmed ceanothus (*Ceanothus verrucosus*) and Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*). Other shrub species associated with this vegetation community include chamise (*Adenostoma fasciculatum*), smooth mountain mahogany (*Cercocarpus minutiflorus*), bushrue (*Cneoridium dumosum*), summer-holly (*Comarostaphylis diversifolia*), sea dahlia, toyon, Torrey pine (*Pinus torreyana*), Nuttall's scrub oak, sugar bush (*Rhus ovata*), and Mojave yucca (*Yucca schidigera*). Many of these species require fire for continued reproduction. Southern maritime chaparral is a Tier I habitat as defined by the City's Biology Guidelines (2018).

There is no southern maritime chaparral within the Climate Smart Village Areas or the Hillcrest FPA area. Within the University CPU area, there are approximately 255 acres of southern maritime chaparral. Southern maritime chaparral occurs within the northernmost portion of the University CPU area, primarily within and immediately adjacent to Torrey Pines State Natural Reserve (see Figure 4.3-3).

### ***Torrey Pines Forest***

Torrey pines forest is an open to moderately dense forest that can grow up to about 65 feet in height in sheltered areas but is much shorter in areas that are wind-blown and exposed. It typically occurs on rocky sandstone soils in mild, frost-free climates with low precipitation and seasonal fog. The dominant species in this vegetation community is the Torrey pine (*Pinus torreyana*). The understory varies greatly. While there are few or almost no understory species on dry, rocky sites where the Torrey pines create a dense tree canopy and needles accumulate on the ground, an understory of fairly dense chaparral can occur on rocky soil and an understory consisting of a mixture of grasses and shrubs can occur in less rocky soils. Torrey pines forest is a Tier I habitat as defined by the City's Biology Guidelines (2018).

There are no Torrey pines forest within the Climate Smart Village Areas or the Hillcrest FPA area. Within the University CPU area, there are approximately 105 acres of Torrey pines forest. Torrey pines forest occurs within the northernmost portion of the University CPU area, primarily within and immediately adjacent to Torrey Pines State Natural Reserve (see Figure 4.3-3).

### ***Valley and Foothill Grassland/ Valley Needlegrass Grassland***

Valley and foothill grassland includes scattered native perennial grasses interspersed with larger stands of introduced non-native grasses. This general vegetation category indicates there is insufficient information to more accurately identify the grassland components present. Included here may be areas of scattered native perennial grasses interspersed with larger stands of introduced non-native grasses. This habitat is classified as a Tier IIIB habitat for this analysis as it is highly probable that the majority of this habitat will ultimately be classified as non-native grasslands when reviewed at the project-specific level.

Valley needlegrass grassland is a plant community comprised of native perennial bunch grasses such as purple needlegrass (*Stipa pulchra*). Native and introduced annuals occur between the perennials, often actually exceeding the bunch grasses in cover. Valley needlegrass grasslands often have a large component of non-native grasses but are distinguished as native grasslands if the percent cover by native grass species is 10 percent or greater. This vegetation community usually occurs on fine-textured (often clay) soils, moist or even waterlogged during winter, but very dry in summer. In most regions, this vegetation community has been mainly converted to non-native annual grasslands due to the invasion of exotic annual grasses. It often interdigitates with oak woodlands on moister, better-drained sites. If classified as non-native grasslands, this is a Tier IIIB habitat. If classified as native grasslands, this is a Tier I habitat.

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 143 acres of valley and foothill grassland in Clairemont Mesa, College Area, Kearny Mesa, Linda Vista, Mira Mesa, Mission Valley, North Park, Pacific Beach, Torrey Highlands, University, and Uptown (see Figures 4.3-1a through e).

Within the Hillcrest FPA area, there is approximately one acre of valley and foothill grassland located along a canyon in the northwest corner (see Figure 4.3-2). Within the University CPU area, there are approximately 509 acres of valley and foothill grassland/valley needlegrass grassland scattered throughout. This vegetation community is concentrated along the northern site boundary and on either side of Rose Canyon (see Figure 4.3-3).

## **b. Wetland Vegetation Communities**

Potential wetland vegetation communities are depicted based on generalized mapping available in public databases including San Diego Association of Governments SANDAG generalized vegetation data. Table 4.3-4 in Section 4.3.1.3 reports potential wetland data based on the National Wetlands Inventory. These sources provide a general idea of the resources present but require site specific verification surveys. Wetland vegetation communities reported in this section are shown on Figures 4.3-1a through 4.3-1e for the Climate Smart Village Areas, Figure 4.3-2 for the Hillcrest FPA area, and Figure 4.3-3 for the University CPU area.

### ***Disturbed Wetland***

Disturbed wetland consists of areas permanently or periodically inundated by water that have been significantly modified by human activity. This includes portions of wetlands with obvious artificial structures such as concrete lining, barricades, rip-rap, piers, or gates. This vegetation community is often unvegetated but may contain scattered native or non-native vegetation. Examples include lined channels, Arizona crossings, detention basins, culverts, and ditches. Disturbed wetlands can be found throughout the City of San Diego, particularly around existing stormwater infrastructure.

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 8 acres of disturbed wetland located in Mission Valley, Navajo, and University (see Figures 4.3-1a through 4.3-1e). There is no disturbed wetland within the Hillcrest FPA area. Within the University CPU area, there are approximately 3 acres of disturbed wetland located east of I-805 and south of Miramar Road in the eastern portion of the University CPU area (see Figure 4.3-3).

### ***Southern Coastal Salt Marsh***

Southern coastal salt marsh is a low-growing (up to 3 feet in height) and highly productive vegetation community composed of herbaceous and suffrutescent, salt-tolerant hydrophytes that typically form moderate to dense vegetative cover. This vegetation community is typically found along sheltered margins of bays, lagoons, and estuaries along the coast that are subject to regular tidal inundation by salt water for at least part of the year. The species found within southern coastal salt marsh are usually segregated horizontally by elevation. Species that typically occur along the upper, landward edges include alkali heath (*Frankenia salina*), seablite (*Suaeda* spp.), and/or pickleweed and glasswort (*Salicornia* spp.). Species that occur along the middle elevations typically include pickleweed, glasswort, and saltwort (*Batis maritima*), and species that occur closest to open water include cordgrass (*Spartina* spp.).

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 12 acres of Southern Coastal Salt Marsh located in Midway-Pacific Highway, Mission Bay Park, Ocean Beach, and Pacific Beach (see Figures 4.3-1a through 4.3-1e). There is no Southern Coastal Salt Marsh in the Hillcrest FPA area.

Within the University CPU area, there are approximately 13 acres of southern coastal salt marsh in the southwestern corner of the University CPU area and in the northwestern corner adjacent to Torrey Pines State Natural Reserve (see Figure 4.3-3).

### ***Coastal and Valley Freshwater Marsh***

Coastal and valley freshwater marsh is dominated by perennial, emergent monocots that grow up to about 15 feet in height and often form completely closed canopies. They are typically lacking significant current and permanently flooded by fresh water. Prolonged saturation permits accumulation of deep, peaty soils. They can be found occasionally along the coast and in coastal valleys near river mouths and around the margins of lakes and springs.

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 24 acres of coastal and valley freshwater marsh located in Mission Valley and Pacific Beach (see Figures 4.3-1a through 4.3-1e). There is no coastal and valley freshwater marsh in the Hillcrest FPA area. Within the University CPU area, there is less than one acre of coastal and valley freshwater marsh located east of I-805, south of Miramar Road, and west of Marine Corps Air Station Miramar (see Figure 4.3-3).

### ***Freshwater Seep***

Freshwater seep consists of mostly perennial herbs, especially sedges and grasses, usually forming complete cover, often low-growing but sometimes taller, growing throughout the year in areas with mild winters. It contains permanently moist or wet soil and is often associated with grasslands or meadows. There is no freshwater seep in the Climate Smart Village Areas or the Hillcrest FPA area. There is approximately 1 acre of freshwater seep located south of Miramar Road and east of I-805 in the eastern portion of the University CPU area (see Figure 4.3-3).

### ***Southern Riparian Forest***

Riparian forests are dense riparian forests that cannot be differentiated to other more specific riparian forests such as Coast Live Oak Riparian Forest. They can be found along streams and rivers. Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 2 acres of southern riparian forest located in Mission Valley (see Figures 4.3-1a through 4.3-1e). There is no southern riparian forest in the Hillcrest FPA area. Within the University CPU area, there are approximately 18 acres of southern riparian forest in the southwestern corner of the University CPU area and in the northwestern corner adjacent to Torrey Pines State Natural Reserve (see Figure 4.3-3).

### ***Southern Coast Live Oak Riparian Forest***

Southern coast live oak riparian forests consist of forests dominated by evergreen sclerophyllous trees (*Quercus agrifolia*) with a closed or nearly-closed canopy. This land cover type appears to be richer in herbs and poorer in understory shrubs than other riparian communities and consists of a homogenous mixture of coast live oak woodland and southern riparian woodland, particularly if the riparian elements are not substantial or are discontinuous. There is no southern coast live oak riparian forest in the Climate Smart Village Areas or the Hillcrest FPA area. Within the University CPU area, there are approximately 7 acres of southern coast live oak riparian forest located along the northeast border south of Carroll Canyon Road (see Figure 4.3-3).

### ***Southern Cottonwood-Willow Riparian Forest***

These forests consist of tall, open, broadleaved winter-deciduous riparian forests dominated by Fremont cottonwood (*Populus fremontii*), black cottonwood (*P. trichocarpa*), and several willow trees. Understories usually are shrubby willows. This vegetation community can be found along perennially wet streams. ~~Although the~~ The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 78 acres of southern cottonwood-willow riparian forest along the San Diego River in Mission Valley (see Figures 4.3-1a through 4.3-1e). There is no southern cottonwood-willow riparian scrub in the Hillcrest FPA area or the University CPU area (see Figure 4.3-3).

### ***Southern Sycamore-Alder Riparian Woodland***

These forests consist of tall, open, broadleaved, winter-deciduous streamside woodlands dominated by western sycamore (*Platanus racemosa*) and often also white alder (*Alnus rhombirolia*). These stands seldom form closed canopy forests, and even may appear as trees scattered in a shrubby thicket of sclerophyllous and deciduous species. This vegetation community can be found along rocky streambeds subject to seasonally high-intensity flooding.

~~Although the~~ The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 12 acres of southern sycamore-alder riparian woodland located in Kearny Mesa and University see (Figures 4.3-1a through 4.3-1e). There is no southern sycamore-alder riparian woodland in the Hillcrest FPA area. Within the University CPU area, there are approximately 89 acres of southern sycamore-alder riparian woodland located within Rose Canyon (see Figure 4.3-3).

### ***Southern Riparian Scrub***

Southern riparian scrub consists of riparian zones dominated by small trees or shrubs and lacking taller riparian trees. It encroaches into some coastal saltmarsh habitats. This vegetation community can be found mostly in major river systems where flood scour occurs. Areas of southern riparian scrub have expanded from increased urban and agricultural run-off.

~~Although the~~ The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 66



acres of Southern Riparian Scrub located in Clairemont Mesa, College Area, Kearny Mesa, Mid-City: City Heights, Mid-City: Eastern Area, Mission Valley, Navajo, Otay Mesa-Nestor, Pacific Beach, Peninsula, San Ysidro, Southeastern San Diego, University, and Uptown (see Figures 4.3-1a through 4.3-1e). There is no southern riparian scrub in the Hillcrest FPA area. Within the University CPU area, there are approximately 57 acres of southern riparian scrub located in many scattered patches in the central portion of the University CPU area east of I-5 and west of I-805 (see Figure 4.3-3).

### ***Southern Willow Scrub***

This vegetation community consists of dense, broadleafed, winter-deciduous riparian thickets dominated by several *Salix* species, with scattered emergent *Populus fremontii* and *Platanus racemosa*. Most stands are too dense to allow much understory development. It is found in loose, sandy or fine gravelly alluvium deposited near stream channels during flood flows. It requires repeated flooding to prevent succession to southern cottonwood-sycamore riparian forest. This type of scrub was formerly extensive along major rivers, but it is now reduced by urban expansion, flood control, and channel “improvements”. There is no southern willow scrub in the Climate Smart Village Areas or the Hillcrest FPA area. Less than one acre of southern willow scrub is mapped within University CPU area. Southern willow scrub occurs in a tiny patch located in Rose Canyon, east of I-805 (see Figure 4.3-3).

### ***Subtidal***

The subtidal ocean zone extends seaward from the low tide line to the depth that supports canopy-forming kelps, typically to about 120 feet below the ocean surface. This area supports a variety of aquatic marine plants, phytoplankton, algae, and macroalgae when there is suitable substrate.

Although the Blueprint SD Initiative’s policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 6 acres of subtidal ocean mapped near the coast in La Jolla, Ocean Beach, and Pacific Beach (see Figures 4.3-1a through 4.3-1e). There is no subtidal in the Hillcrest FPA area. Within the University CPU area, there are approximately 4 acres of subtidal located in a narrow strip along the northwestern boundary inside the Torrey Pines State Natural Reserve (see Figure 4.3-3).

### ***Shallow Bay***

Shallow bay is a bay less than 4 feet deep where light penetrates to the sea floor. Characteristic species may include common eelgrass (*Zostera marina*), but this land cover type is often unvegetated.

Although the Blueprint SD Initiative’s policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts

associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 7 acres of shallow bay located in Mission Bay Park, while not proposed for development these are edges of the bay that fall within the Climate Smart Village Area boundaries (see Figures 4.3-1a through 4.3-1e). There is no shallow bay in the Hillcrest FPA area or the University CPU area.

### ***Estuarine***

Estuarine habitats occur on periodically and permanently flooded substrates and open water portions of semi-enclosed coastal waters where tidal seawater is diluted by flowing fresh water. Salinity and depth varies dramatically in estuarine habitats, resulting in high species richness but low diversity of phyla. Estuarine habitats commonly occur at the drowned mouths of perennial river tributaries to the Pacific Ocean in San Diego.

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 6 acres of estuarine habitat located Midway-Pacific Highway, Mission Bay Park, and Peninsula (see Figures 4.3-1a through 4.3-1e). There is no estuarian habitat in the Hillcrest FPA area.

### ***Freshwater***

Freshwater is comprised of year-round bodies of fresh water (extremely low salinity) in the form of lakes, streams, ponds or rivers. This includes those portions of water bodies that are usually covered by water and contain less than 10% vegetative cover.

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 80 acres of freshwater located in Mira Mesa, Mission Valley, and Navajo (see Figure 4.3-1a through 4.3-1e). There is no freshwater habitat in the Hillcrest FPA area or the University CPU area.

### ***Vernal Pools***

Vernal pools are seasonally flooded depressions that support a distinctive living community adapted to extreme variability in hydrologic conditions (seasonally very dry and very wet conditions). Although vernal pools are often associated with hummocks or mima-mounds, this feature is not always present. In San Diego, vernal pools often retain pooled water for about 2 weeks after significant rain events; for vernal pools in swale systems water usually remains at least 2 weeks after surface flows cease. Vernal pools can be differentiated from other temporary wetlands by the following criteria: (1) the basin is at least partially vegetated during the normal growing season or is

unvegetated due to heavy clay or hardpan soils that do not support plant growth; and (2) the basin contains at least one vernal pool indicator species (e.g., woolly marbles [*Psilocarphus* spp.], toothed downingia [*Downingia cuspidata*], San Diego button celery [*Eryngium aristulatum* var. *parishii*], or crustaceans – *Branchinecta* spp., *Streptocephalus* spp., and others).

Within the University CPU area, vernal pools are located in the eastern portion of the CPU area along Miramar Road. There are additional occurrences in the western portion located on Nobel Drive and near the Torrey Pines Gliderport (see Figure 7a and 7b of Appendix D). There are no known vernal pools in the Climate Smart Village Areas or the Hillcrest FPA area.

### ***Non-Vegetated Channel or Floodway***

Consists of sandy, gravelly, or rocky fringe of waterways or flood channels. It is typically unvegetated on a relatively permanent basis. Variable water lines inhibit the growth of vegetation, although some weedy species of grasses may grow along the outer edges of the wash. Vegetation may exist here but is usually less than 10 percent total cover.

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 3 acres of non-vegetated channel or floodway in Mission Valley (see Figures 4.3-1a through 4.3-1e). There is no non-vegetated channel or floodway within the Hillcrest FPA area. Within the University CPU area, there is approximately 1 acre of non-vegetated channel or floodway in Rose Canyon, immediately east of I-805 (see Figure 4.3-3).

### ***Beach***

Beaches consist of sandy and/or cobbly habitat on coastal strands, lagoons, or lakes. Ocean beaches are a shoreline feature of deposited sand formed by waves and tides off the coast. Beaches on lakes may be a result of waves, disturbance, or geological formations. These are mainly unvegetated areas, however, upper portions may be thinly populated with herbaceous species. Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 28 acres of beach located in La Jolla, Mission Bay Park, Mission Beach, Ocean Beach, and Pacific Beach (see Figures 4.3-1a through 4.3-1e). There is no beach in the Hillcrest FPA area. Approximately 44 acres of beach are mapped within the University CPU area (see Figure 4.3-3).

## c. Disturbed/Developed Land Cover Types

### ***Disturbed Land***

Disturbed land refers to areas that retain a soil substrate but on which the native vegetation has been significantly altered by previous human activity, such that the species composition and site conditions are no longer recognizable as a native or naturalized vegetation community. Vegetation, if present, is typically composed of predominantly non-native species – such as Russian-thistle (*Salsola tragus*), horseweed (*Conyza* spp.), mustard (*Hirschfeldia incana*), and non-native grasses – that have been introduced and established through human action. These areas are not typically artificially irrigated but receive water from precipitation and runoff. Examples of disturbed land include areas that have been graded, cleared for fuel management purposes, recently graded firebreaks, graded construction pads and staging areas, off-road vehicle trails, active agriculture, and fire, and old home sites. Disturbed land is classified as a Tier IV habitat as defined by the City's Biology Guidelines (2018).

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 456 acres of disturbed land located in Clairemont Mesa, College Area, Encanto Neighborhoods, Greater Golden Hill, Kearny Mesa, Linda Vista, Mid-City: City Heights, Mid-City: Eastern Area, Mid-City: Kensington-Talmadge, Mid-City: Normal Heights, Mira Mesa, Mission Bay Park, Mission Valley, North Park, Old Town San Diego, Otay Mesa-Nestor, Pacific Beach, Peninsula, San Ysidro, Serra Mesa, Southeastern San Diego, University, and Uptown (see Figures 4.3-1a through 4.3-1e). Within the Hillcrest FPA area, there are approximately 6 acres of disturbed land along the northern boundary of the Hillcrest FPA area south of State Route (SR) 163 (see Figure 4.3-2). Within the University CPU area, there are approximately 367 acres of disturbed land scattered throughout, with large swaths of disturbed land located in the northern portion of the University CPU area on either side of I-5 (see Figure 4.3-3).

### ***Urban/Developed***

Urban/developed lands have been constructed upon or physically altered such that they support no naturally occurring native vegetation and are characterized by the presence of permanent or semi-permanent human-made structures, such as buildings or roads. The level of soil disturbance is such that only the most ruderal plant species would be expected. In many areas, ornamental plantings are included in developed lands where they are immediately adjacent and part of the residential and/or commercial development. Developed land can also describe areas where no natural land is evident as a result of a large amount of debris or other man-made materials, such as a recycling plant or quarry.

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide.

Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. Urban/developed land is the primary vegetation/land cover type of the Climate Smart Village Areas and comprises approximately 23,239 acres (see Figure 4.3-1a through 4.3-1e). Within the Hillcrest FPA area, urban/developed land is the primary vegetation/land cover type and comprises approximately 366 acres (see Figure 4.3-2). Within the University CPU area, urban/developed land is the primary vegetation/land cover type and comprises approximately 5,451 acres (see Figure 4.3-3).

### **Agriculture**

Agriculture land cover types include extensive agriculture and intensive agriculture. Extensive agriculture includes field and pasture and consists of a dense habitat with nearly 100 percent cover. Planted fields are usually monoculture crops that are irrigated and usually artificially seeded and maintained. Row crops are comprised of annual and perennial crops grown in rows with open space between the rows. Species composition frequently changes by season and year. Row crops often occur in floodplains or upland areas with high soil quality. Row crops are nearly always artificially irrigated. Intensive agriculture consists of dairies, nurseries, and chicken ranches. Open spaces are typically used for livestock. There is usually no vegetation present except between animal holding areas. Agriculture is categorized as a Tier IV habitat as defined by the City's Biology Guidelines (2018).

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide, nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 16 acres of agriculture based on generalized vegetation data including approximately 5 acres of extensive agricultural land and 11 acres of intensive agriculture in Linda Vista, Midway-Pacific Highway, Otay Mesa-Nestor, and San Ysidro (see Figures 4.3-1a through 4.3-1e). These lands may not be in active agriculture and land may be fallow vegetation including non-native grassland or other sensitive habitats. There is no agriculture in the Hillcrest FPA area or the University CPU area.

### **Eucalyptus Woodland**

Eucalyptus woodland is typically characterized by dense stands of gum trees (*Eucalyptus* spp.), often monotypic and dominated by either blue gum (*Eucalyptus globulus*) or river red gum (*E. camaldulensis*); however, sparse eucalyptus woodland also occurs. Many areas of eucalyptus woodland contain little understory, as very few plants are able to tolerate the chemical compounds in the bark and leaf litter. Plants in this genus, imported primarily from Australia, were originally planted in groves throughout many regions of coastal California as a potential source of lumber and building materials, for their use as windbreaks, and for their horticultural novelty. They have increased their cover through natural regeneration, particularly in moist areas sheltered from strong coastal winds. Gum trees naturalize readily in this state and, where they form dense, monotypic stands, tend to completely supplant native vegetation and alter community structure and dynamics.

This land cover type is categorized as a Tier IV habitat as defined by the City's Biology Guidelines (2018).

Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas contain approximately 15 acres of eucalyptus woodland located in Balboa Park, Greater Golden Hill, Mission Valley, Peninsula, Rancho Bernardo, and University (see Figures 4.3-1a through 4.3-1e). Within the Hillcrest FPA area, there is less than one acre of eucalyptus woodland located interspersed with chaparral along a canyon edge in the northwestern portion of the FPA area (see Figure 4.3-2). Within the University CPU area, there are approximately 95 acres of eucalyptus woodland located in the central portion of the University CPU area, primarily on and adjacent to the University of California, San Diego (UCSD) campus (see Figure 4.3-3).

### 4.3.1.3 Sensitive Plant Species

Sensitive plant species are those that are considered by the federal government, state, or California Native Plant Society (CNPS) as rare, threatened, or endangered; Multiple Species Conservation Program (MSCP) Covered Species; or MSCP narrow endemic species. More specifically, if a species is designated with any of the following statuses (a through c below), it is considered sensitive per the San Diego Municipal Code (SDMC; Chapter 11, Article 3, Division 1):

- (a) A species or subspecies is listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, California Code of Regulations (CCR); or the federal Endangered Species Act (ESA), Title 50, Code of Federal Regulations (CFR), Section 17.11 or 17.12; or candidate species under the CCR;
- (b) A species is a narrow endemic species as listed in the Biology Guidelines in the Land Development Manual (LDM) (City of San Diego 2018); and/or
- (c) A species is an MSCP Covered Species as listed in the Biology Guidelines in the LDM (City of San Diego 2018).

A plant species may also be considered sensitive if it is included in the CNPS Inventory of Rare and Endangered Plants (CNPS 2018). Sensitive plant status is often based on one or more of three distributional attributes: geographic range, habitat specificity, and/or population size. A species that exhibits a small or restricted geographic range (such as those endemic to the region) is geographically rare. A species may be more or less abundant but occur only in very specific habitats. Lastly, a species may be widespread, but exist naturally in small populations.

The potential for sensitive plant species to occur or have the potential to occur in a given area is highly site specific and requires project-level surveys and an evaluation based on known ranges (geographic and elevational), habitat preferences, and historical occurrences. The assessments for the potential occurrence of sensitive wildlife species were based on known ranges (geographic and

elevational), habitat preferences for the species, historical species occurrence records, and data from several recent biological resources reports conducted for private development projects. In addition, for species with limited available data from the above databases, information from other reputable biological data sources (e.g., the Center for Biological Diversity, iNaturalist, and the Xerces Society for Invertebrate Conservation) were used to obtain species specific information. The use of citizen science-based sources, such as iNaturalist, must be verified by a City biologist or a City-approved consultant biologist prior to including the information in the surveys and determining the potential for occurrence.

Sensitive plant species that occur or have a potential to occur within the Climate Smart Village Areas and the Hillcrest FPA area are reported in Table 4.3-2; however, there is potential that more species may be present based on future site-specific biological surveys. The presence or absence of sensitive plant species will be determined during project level reviews as future site-specific projects come forward.

The Biological Resources Report completed for the University CPU (see Appendix D) identified 47 sensitive plant species either known to occur or with a potential to occur within the University CPU area. Refer to Table 4 of Appendix D for additional information regarding the sensitive plant species that occur or have a potential to occur within the University CPU area. Species that occur or have a potential to occur within the Climate Smart Village Areas and the Hillcrest FPA are reported in Table 4.3-2.

#### **4.3.1.4 Sensitive Wildlife Species**

Sensitive wildlife species are those that are considered federal or state threatened or endangered; MSCP Covered Species; or MSCP narrow endemic species. More specifically, if a species is designated with any of the following statuses (a through c below), it is considered sensitive per the SDMC (Chapter 11, Article 3, Division 1):

- (a) A species or subspecies is listed as endangered or threatened under Section 670.2 or 670.5, Title 14, CCR; or the federal ESA, Title 50, CFR, Section 17.11 or 17.12; or candidate species under the CCR;
- (b) A species is a narrow endemic species as listed in the Biology Guidelines in the LDM (City of San Diego 2018); and/or
- (c) A species is an MSCP Covered Species as listed in the Biology Guidelines in the LDM (City of San Diego 2018).

**Table 4.3-2  
Sensitive Plant Species that Occur or have a Potential to Occur within the Project Areas<sup>1</sup>**

Species	Sensitivity	Description	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
San Diego button-celery ( <i>Eryngium aristulatum</i> var. <i>parishii</i> )	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Biennial/perennial herb; vernal pools, mesic areas of coastal sage scrub and grasslands, blooms April-June; elevation less than 2,000 feet. Known from San Diego and Riverside counties. Additional populations occur in Baja California, Mexico.	<b>Present.</b> Known from 49 locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
California Orcutt grass ( <i>Orcuttia californica</i> )	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools; blooms April-August; elevation 50-2,200 feet.	<b>Potential.</b> No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Salt marsh bird's beak ( <i>Chloropyron maritimum</i> ssp. <i>Maritimum</i> [= <i>Cordylanthus maritimus</i> ssp. <i>Maritimus</i> ])	FE SE CRPR 1B.2 City of San Diego MSCP	Annual herb (hemiparasitic); coastal dunes, coastal salt marshes and swamps; blooms May-October; elevation less than 100 feet.	<b>Present.</b> Known from 5 locations in La Jolla (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Spreading navarretia ( <i>Navarretia fossalis</i> )	FT CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools, marshes and swamps, chenopod scrub; blooms April-June; elevation 100-4,300 feet.	<b>Potential.</b> No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Thread-leaved brodiaea ( <i>Brodiaea filifolia</i> )	FT SE CRPR 1B.1 City of San Diego NE, MSCP	Perennial herb (bulbiferous); cismontane woodland, coastal sage scrub, playas, valley and foothill grassland, vernal pools; often clay soils; blooms March-June; elevation less than 2,850-3,675 feet. California endemic. Known from San Diego, Riverside, Orange, Los Angeles, and San Bernardino counties.	<b>Potential.</b> No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.



**Table 4.3-2  
Sensitive Plant Species that Occur or have a Potential to Occur within the Project Areas<sup>1</sup>**

Species	Sensitivity	Description	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
Orcutt's spineflower ( <i>Chorizanthe orcuttiana</i> )	FE SE CRPR 1B.1	Annual herb; maritime chaparral, closed-cone coniferous forest, coastal sage scrub; sandy openings; blooms March–May; elevation less than 400 feet. San Diego County endemic. Known from fewer than 20 occurrences.	<b>Present.</b> Known from 20 locations in La Jolla and Point Loma (CDFW 2024).	<b>Potential.</b> Although no historical records occur (CDFW 2024), this species has potential to occur within suitable coastal sage scrub habitat along the canyon in the northern corner of the Hillcrest FPA Area.
Willow monardella ( <i>Monardella viminea</i> [= <i>Monardella linoides</i> ])	FE SE CNPS 1B.1 City of San Diego MSCP	Perennial herb; closed-cone coniferous forest, chaparral, coastal sage scrub, riparian scrub, riparian woodlands, sandy seasonal dry washes; blooms June–August; elevation 160–740 feet. San Diego County endemic.	<b>Present.</b> Known from 66 locations throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
San Diego mesa mint ( <i>Pogogyne abramsii</i> )	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools; blooms March–July; elevation 300–700 feet. San Diego County endemic.	<b>Present.</b> Known from 208 locations throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Otay mesa mint ( <i>Pogogyne nudiuscula</i> )	FE SE CRPR 1B.1 City of San Diego NE, VPHCP	Annual herb; vernal pools; blooms May–July; elevation 300–820 feet. In California, known from approximately 10 occurrences in Otay Mesa in San Diego County. Additional populations occur in Baja California, Mexico.	<b>Present.</b> Known from 77 locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
San Diego thornmint ( <i>Acanthomintha ilicifolia</i> )	FT SE CRPR 1B.1 City of San Diego NE, MSCP	Annual herb; chaparral, coastal sage scrub, and grasslands; friable or broken clay soils; blooms April–June; elevation less than 3,200 feet.	<b>Present.</b> Known from 60 locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> One historical record occurs from 1936 (CDFW 2024); however, this species is possibly extirpated.
Del Mar manzanita ( <i>Arctostaphylos glandulosa</i> ssp. <i>Crassifolia</i> )	FE CRPR 1B.1 City of San Diego MSCP	Perennial evergreen shrub; southern maritime chaparral; sandy soil; blooms December–June; elevation less than 1,200 feet.	<b>Potential.</b> No historical records occur (CDFW 2024); however, suitable habitat is present throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.

**Table 4.3-2  
Sensitive Plant Species that Occur or have a Potential to Occur within the Project Areas<sup>1</sup>**

Species	Sensitivity	Description	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
Variegated dudleya ( <i>Dudleya variegata</i> )	CRPR 1B.2 City of San Diego NE, MSCP	Perennial herb; openings in chaparral, coastal sage scrub, grasslands, vernal pools; blooms April-June; elevation less than 1,900 feet.	<b>Present.</b> Known from 106 locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Potential.</b> One historical record occurs from 1936 (CDFW 2024) and this species has potential to occur in openings in coastal sage scrub and chaparral along the canyons in the northwestern corner of the Hillcrest FPA Area.

<sup>1</sup> Refer to Appendix D for detail on the sensitive plant species that occur or have a potential to occur within the University CPU area.

SOURCES: Jepson Flora Project 2022; CDFW 2024; Calflora 2023; NatureServe 2023

**STATUS CODES**

Federal Status

FE = Listed as endangered by the federal government

FT = Listed as threatened by the federal government

State Status

SE = Listed as endangered by the state of California

California Native Plant Society (CNPS): California Rare Plant Ranks (CRPR)

1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.

0.1 = Species seriously threatened in California (over 80% of occurrences threatened; high degree and immediacy of threat).

0.2 = Species fairly threatened in California (20-80% occurrences threatened; moderate degree and immediacy of threat).

City of San Diego

MSCP = City of San Diego MSCP Subarea Plan covered species.

NE = Narrow Endemic species that have limited distributions in the region and require focused evaluations during project review.

VPHCP = City of San Diego Vernal Pool Habitat Conservation Plan covered species.

A species may also be considered sensitive if it is included on the California Department of Fish and Wildlife's (CDFW's) special animals list as a candidate for federal or state listing, state species of special concern, state watch list species, state fully protected species, or federal bird of conservation concern. Generally, the principal reason an individual taxon (species or subspecies) is considered sensitive is the documented or perceived decline or limitations of its population size or geographical extent and/or distribution, resulting in most cases from habitat loss. Additionally, avian nesting is protected by the California Fish and Game Code Section 3503. The potential for wildlife species to occur in a given area is highly site specific and requires project-level surveys and evaluation. The assessments for the potential occurrence of sensitive wildlife species were based on known ranges (geographic and elevational), habitat preferences for the species, historical species occurrence records, and data from several recent biological resources reports conducted for private development projects. In addition, for species with limited available data from the above databases, information from other reputable biological data sources (e.g., the Center for Biological Diversity, iNaturalist, and the Xerces Society for Invertebrate Conservation) were used to obtain species specific information. The use of citizen science-based sources, such as iNaturalist, must be verified by a City biologist or a City-approved consultant biologist prior to including the information in the surveys and determining the potential for occurrence.

The Biological Resources Report completed for the University CPU (see Appendix D) identified 37 sensitive wildlife species either known to occur or with a potential to occur within the University CPU area. Refer to Table 6 of Appendix D for sensitive species with a potential to occur within the University CPU area. Based on known ranges (geographic and elevational), habitat preferences, and a historical occurrence record search of the California Natural Diversity Database (CDFW 2024), sensitive wildlife species have the potential to occur within the ~~Blueprint SD Initiative~~ Climate Smart Village Areas and Hillcrest FPA area as reported in Table 4.3-3; however, this information is based on generalized data and more species may be present.

#### **4.3.1.5 Wetlands**

In addition to the potential wetland communities reported in Section 4.3.1.2b, Figures 4.3-4a through 4.3-4e and 4.3-5 identify wetland vegetation communities from the National Wetlands Inventory for the Climate Smart Village Areas and the University CPU area, respectively. No wetlands are mapped within the Hillcrest FPA area. As shown in Table 4.3-4, approximately 314 acres of potential wetlands are located in the Climate Smart Village Areas and approximately 124 acres are located within the University CPU area, primarily within the Multi-Habitat Planning Area (MHPA).

**Table 4.3-3  
Sensitive Wildlife Species with a Potential to Occur within the Project Areas**

Species	Sensitivity	Habitat	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
<i>Invertebrates</i>				
Quino checkerspot butterfly ( <i>Euphydryas editha quino</i> )	FE	Open, dry areas in foothills, mesas, lake margins. Larval host plant <i>Plantago erecta</i> . Adult emergence mid-January through April.	<b>Present.</b> Known from 74 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Riverside fairy shrimp ( <i>Streptocephalus woottoni</i> )	FE City of San Diego VPHCP	Vernal pools.	<b>Present.</b> Known from 55 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
San Diego fairy shrimp ( <i>Branchinecta sandiegonensis</i> )	FE City of San Diego VPHCP	Vernal pools.	<b>Present.</b> Known from 783 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
<i>Amphibians</i>				
Western spadefoot ( <i>Spea hammondi</i> )	FPT SSC	Vernal pools, floodplains, and alkali flats within areas of open vegetation.	<b>Present.</b> Known from 464 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> Although 1 historical record occurs for this species in 1946 (CDFW 2024), much of this species' natural habitat has been destroyed due to development and no suitable habitat is present within the Hillcrest FPA Area.
Arroyo toad ( <i>Anaxyrus californicus</i> [= <i>Bufo microscaphus californicus</i> ])	FE SSC City of San Diego MSCP	Open streamside sand/gravel flats. Quiet, shallow pools along stream edges are breeding habitat. Nocturnal except during breeding season (March–July).	<b>Present.</b> Known from 94 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
<i>Reptiles</i>				
Southwestern pond turtle ( <i>Emys marmorata</i> )	SSC MSCP	Ponds, small lakes, marshes, slow-moving, sometimes brackish water.	<b>Potential.</b> Suitable ponds, small lakes and marshes with slow-moving water habitats are present throughout the Climate Smart Village Areas.	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.

**Table 4.3-3  
Sensitive Wildlife Species with a Potential to Occur within the Project Areas**

Species	Sensitivity	Habitat	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
San Diegan legless lizard ( <i>Anniella stebbinsi</i> [= <i>Anniella pulchra</i> ])	SSC	Herbaceous layers with loose soil in coastal scrub, chaparral, and open riparian. Prefers dunes and sandy washes near moist soil.	<b>Present.</b> Known from 385 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Potential.</b> Known from 1 historical location in 1976 (CDFW 2024) and suitable coastal scrub and chaparral habitat occurs in the northwestern corner of the Hillcrest FPA Area.
California glossy snake ( <i>Arizona elegans occidentalis</i> )	SSC	Scrub and grassland habitats, often with loose or sandy soils.	<b>Present.</b> Known from 184 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Potential.</b> Known from 1 historical location in 1942 (CDFW 2024) and marginally suitable scrub habitat occurs in the northwestern corner of the Hillcrest FPA Area.
<i>Birds</i>				
American peregrine falcon ( <i>Falco peregrinus anatum</i> )	City of San Diego MSCP	Open coastal areas, mud flats. Rare inland. Rare fall and winter resident, casual in late spring and early summer. Local breeding populations extirpated.	<b>Present.</b> Known from 278 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> Known from 1 historical location in 1990 (CDFW 2024); however, no suitable habitat is present.
California least tern ( <i>Sternula</i> [= <i>Sterna</i> ] <i>antillarum browni</i> )	FE SC, CFP City of San Diego MSCP	Bays, estuaries, lagoons, shoreline. Resident. Localized breeding.	<b>Present.</b> Known from 32 historical locations in Point Loma and La Jolla (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Coastal California gnatcatcher ( <i>Polioptila californica californica</i> )	FT SSC City of San Diego MSCP	Coastal sage scrub, maritime succulent scrub. Resident.	<b>Present.</b> Known from 1,648 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Potential.</b> No historical records occur (CDFW 2024); however, suitable Diegan coastal sage scrub is present along the northern site boundary.
Least Bell's vireo ( <i>Vireo bellii pusillus</i> )	FE SE City of San Diego MSCP	Willow riparian woodlands. Summer resident.	<b>Present.</b> Known from 820 historical locations throughout the Climate Smart Village Areas (CDFW 2024).	<b>Not Expected.</b> Although 1 historic record occurs from 1921 (CDFW 2024), much of this species' natural habitat has been destroyed due to development and no suitable habitat is present within the Hillcrest FPA Area.

**Table 4.3-3  
Sensitive Wildlife Species with a Potential to Occur within the Project Areas**

Species	Sensitivity	Habitat	Potential to Occur within Climate Smart Village Areas	Potential to Occur within Hillcrest FPA Area
Light-footed Ridgway's rail ( <i>Rallus obsoletus</i> [=longirostris] levipes)	FE SE, CFP City of San Diego MSCP	Salt marshes supporting <i>Spartina foliosa</i> . Localized resident.	<b>Present.</b> Known from 39 historical locations in Imperial Beach and La Jolla(CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Southwestern willow flycatcher ( <i>Empidonax traillii extimus</i> )	FE SE City of San Diego MSCP	Nesting restricted to willow thickets. Also occupies other woodlands. Rare spring and fall migrant, rare summer resident. Extremely localized breeding.	<b>Present.</b> Known from 3 locations (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024). This species is unlikely to be present during migration and is not expected to nest within the Hillcrest FPA area.
Western snowy plover ( <i>Charadrius nivosus</i> [=alexandrinus] nivosus)	FT SSC City of San Diego MSCP	Sandy beaches, lagoon margins, tidal mud flats. Migrant and winter resident. Localized breeding.	<b>Present.</b> Known from 33 locations in Point Loma and Imperial Beach (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.
Western yellow-billed cuckoo ( <i>Coccyzus americanus occidentalis</i> )	FT SE City of San Diego MSCP	Riparian woodlands. Summer resident. Very localized breeding.	<b>Present.</b> Known from 29 locations (CDFW 2024).	<b>Not Expected.</b> No historical records occur (CDFW 2024) and no suitable habitat is present.

SOURCES: American Society of Mammalogists 2021; Bradley et al. 2014; Chesser et al. 2022; Crother et al. 2017; CDFW 2024

**STATUS CODES**

Federal Status

FE = Listed as endangered by the federal government  
 FPT = Listed as proposed threatened by the federal government  
 FT = Listed as threatened by the federal government

State Status

CFP = California fully protected species  
 SE = Listed as endangered by the state of California  
 SSC = California Department of Fish and Wildlife species of special concern

City of San Diego

MSCP = City of San Diego MSCP Subarea Plan covered species  
 VPHCP = City of San Diego Vernal Pool Habitat Conservation Plan covered species

	Climate Smart Village Areas (acres)	University CPU Area (acres)
Estuarine and Marine Deepwater	8.8	0.0
Estuarine and Marine Wetland	26.2	36.0
Freshwater Emergent Wetland	32.1	11.6
Freshwater Forested/Shrub Wetland	151.2	61.2
Freshwater Pond	28.1	0.5
Riverine	67.2	14.5
Total	313.6	123.7
SOURCE: National Wetlands Inventory 2022		

### 4.3.1.6 Wildlife Movement

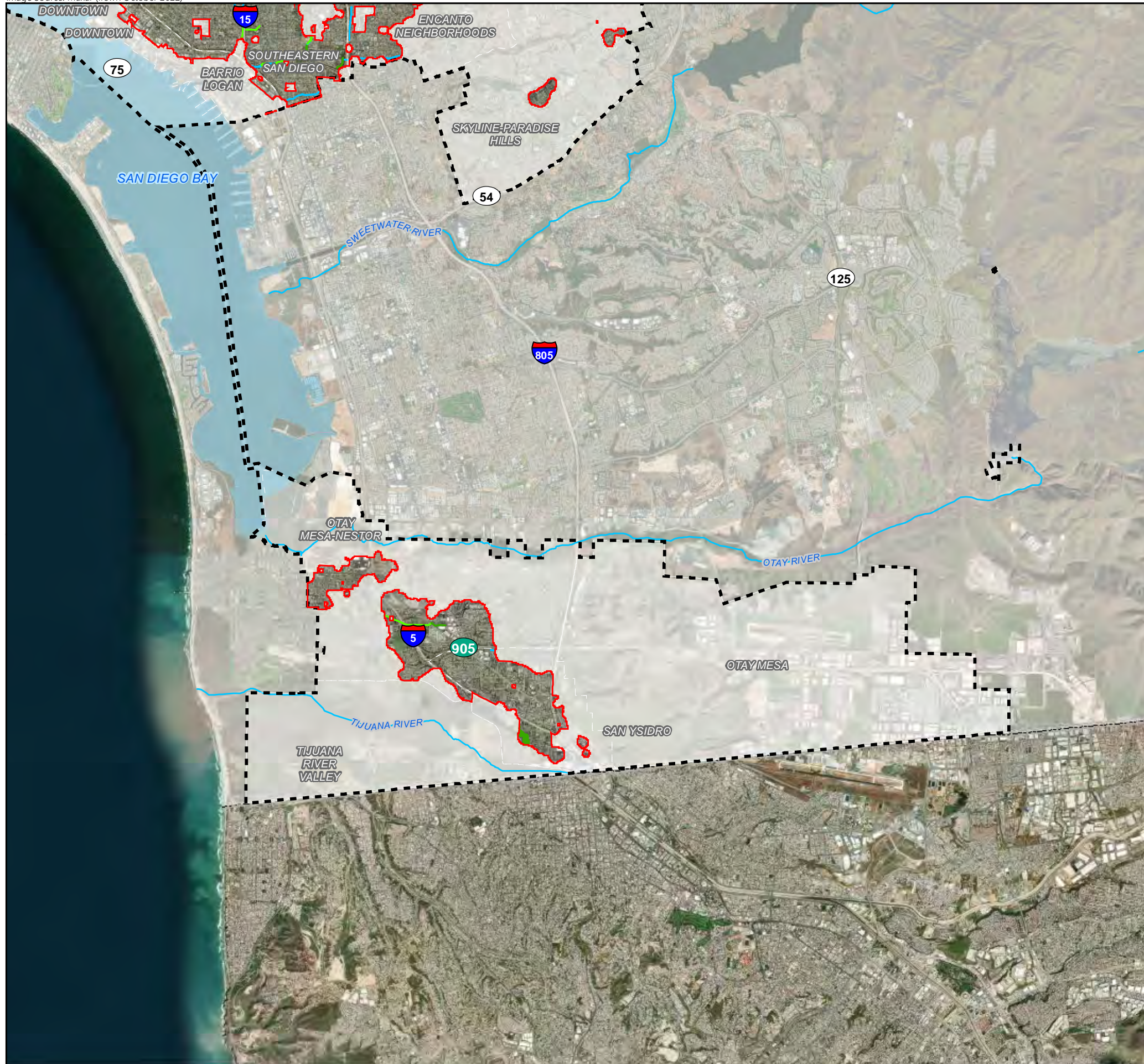
Habitat linkages and wildlife corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Habitat linkages and wildlife corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations. Wildlife movement corridors are considered sensitive by the City and resource and conservation agencies.

Wildlife corridors can be classified as either regional corridors or local corridors. Regional corridors are defined as those linking two or more large areas of natural open space, and local corridors are defined as those allowing resident animals to access critical resources (e.g., food, cover, water) in a smaller area that might otherwise be isolated by some form of urban development (e.g., roads, housing tracts).

#### a. Blueprint SD Initiative

Wildlife movement corridors are identified throughout the City in the City's MSCP Subarea Plan (SAP). Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Climate Smart Village Areas are areas that have good access to homes, jobs, and mixed-use destinations and that are in proximity to available high-frequency transit services, have transit access to job centers, and have good connection between transit and destinations. Given these characteristics, the Climate Smart Village Areas are located largely within urbanized settings and outside of any City MSCP SAP designated wildlife corridors.





- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Riverine

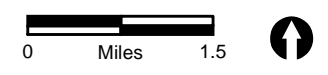
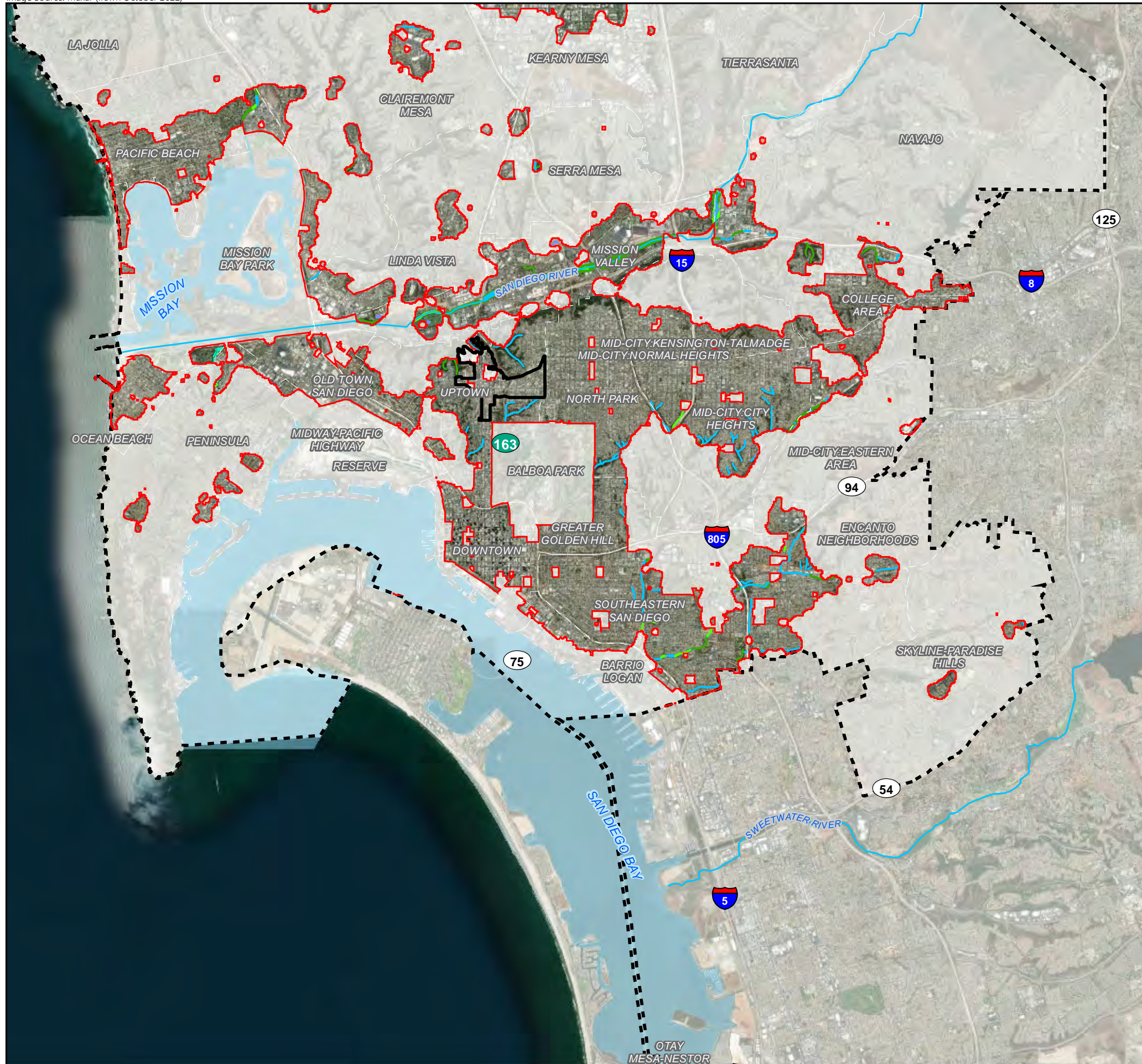


FIGURE 4.3-4a  
Potential Wetlands in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South





- Hillcrest Focused Plan Amendment Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Riverine

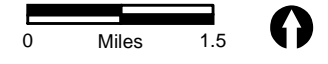
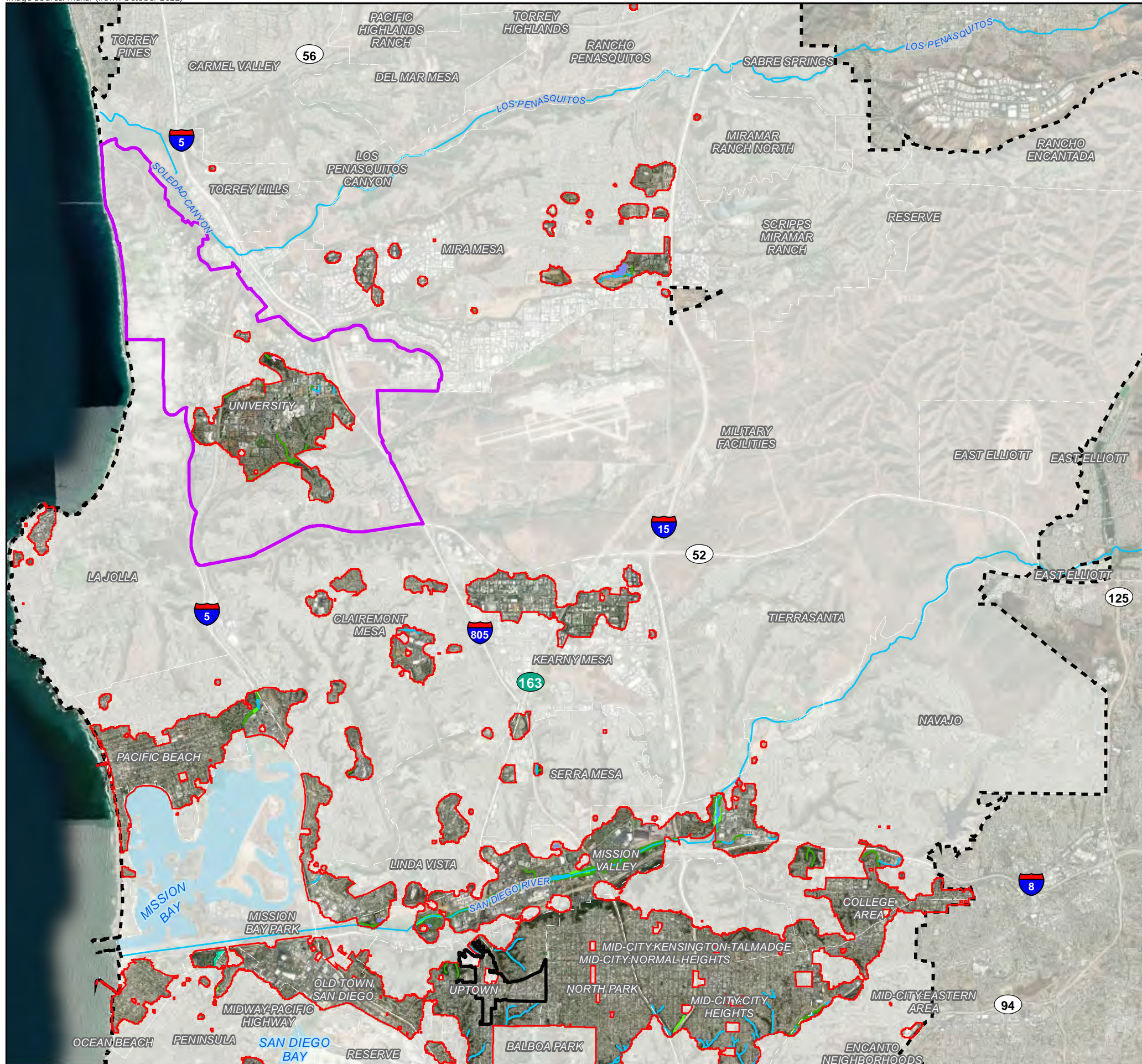


FIGURE 4.3-4b  
Potential Wetlands in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South Central





- Hillcrest Focused Plan Amendment Area
- University Community Plan Update Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Riverine
- Riparian

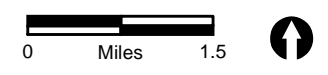
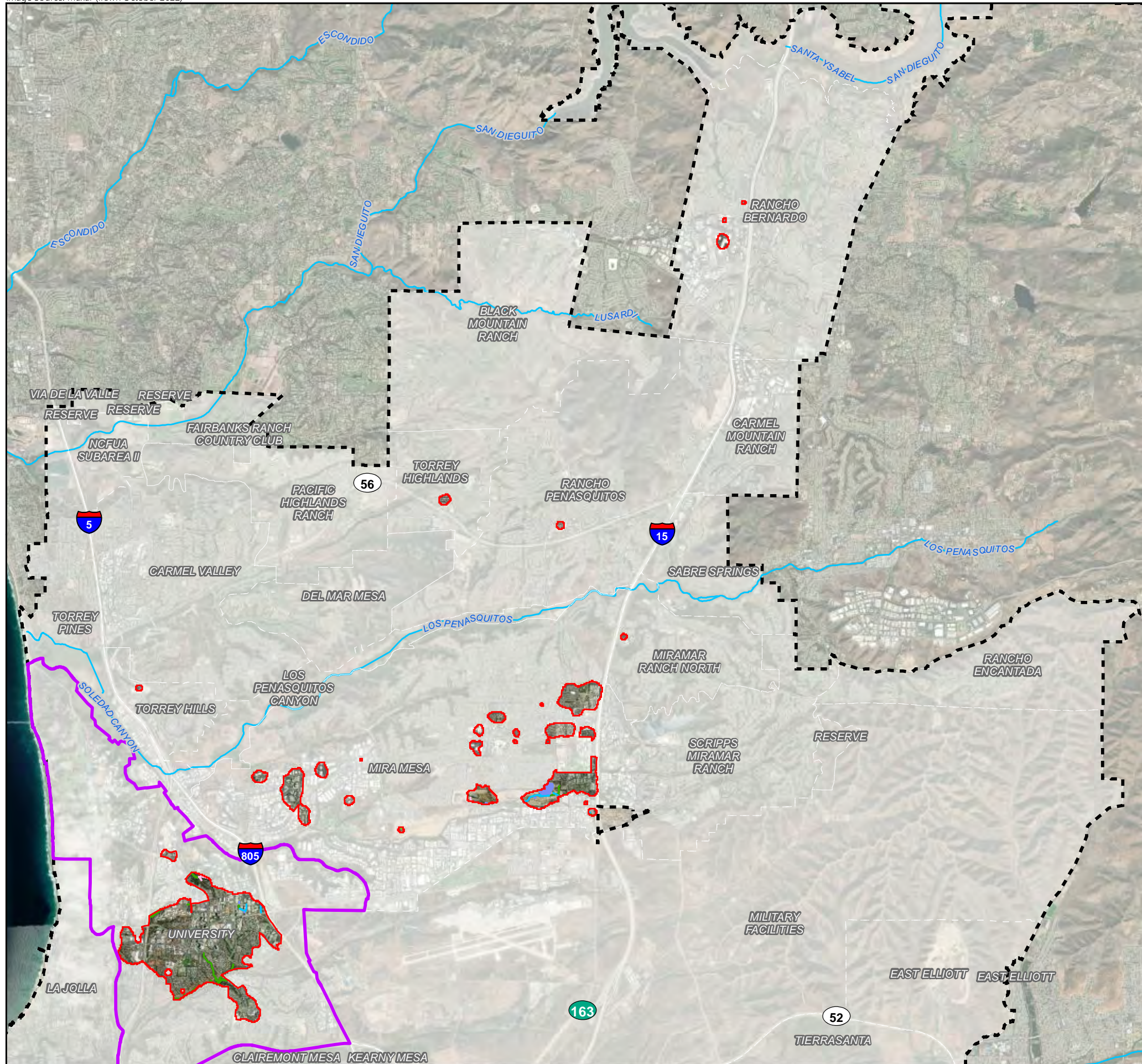


FIGURE 4.3-4c  
Potential Wetlands in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North Central





- University Community Plan Update Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond
- Riverine
- Riparian

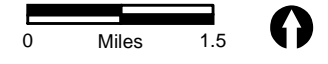
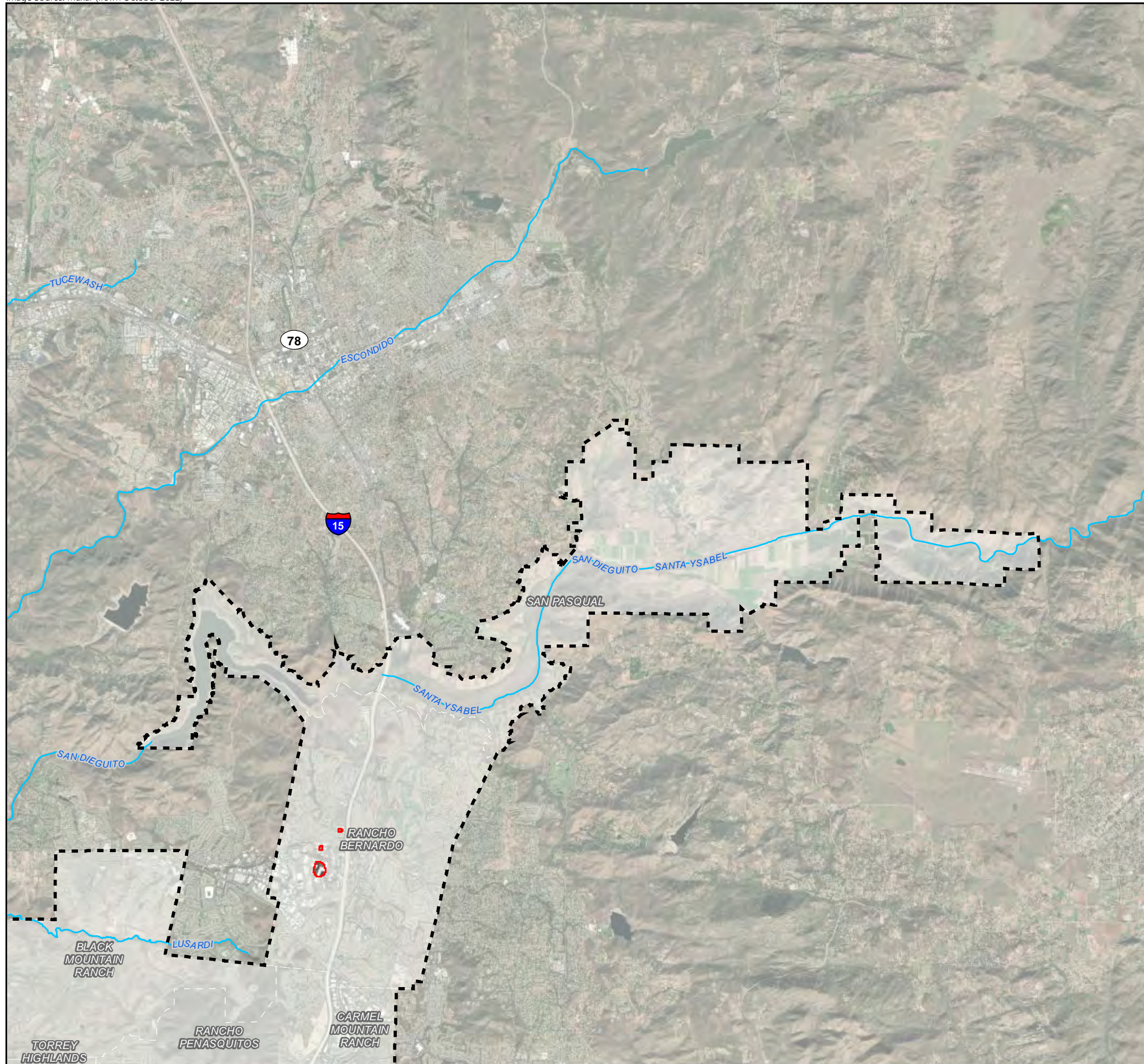


FIGURE 4.3-4d  
Potential Wetlands in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North





- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits

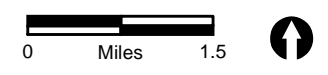
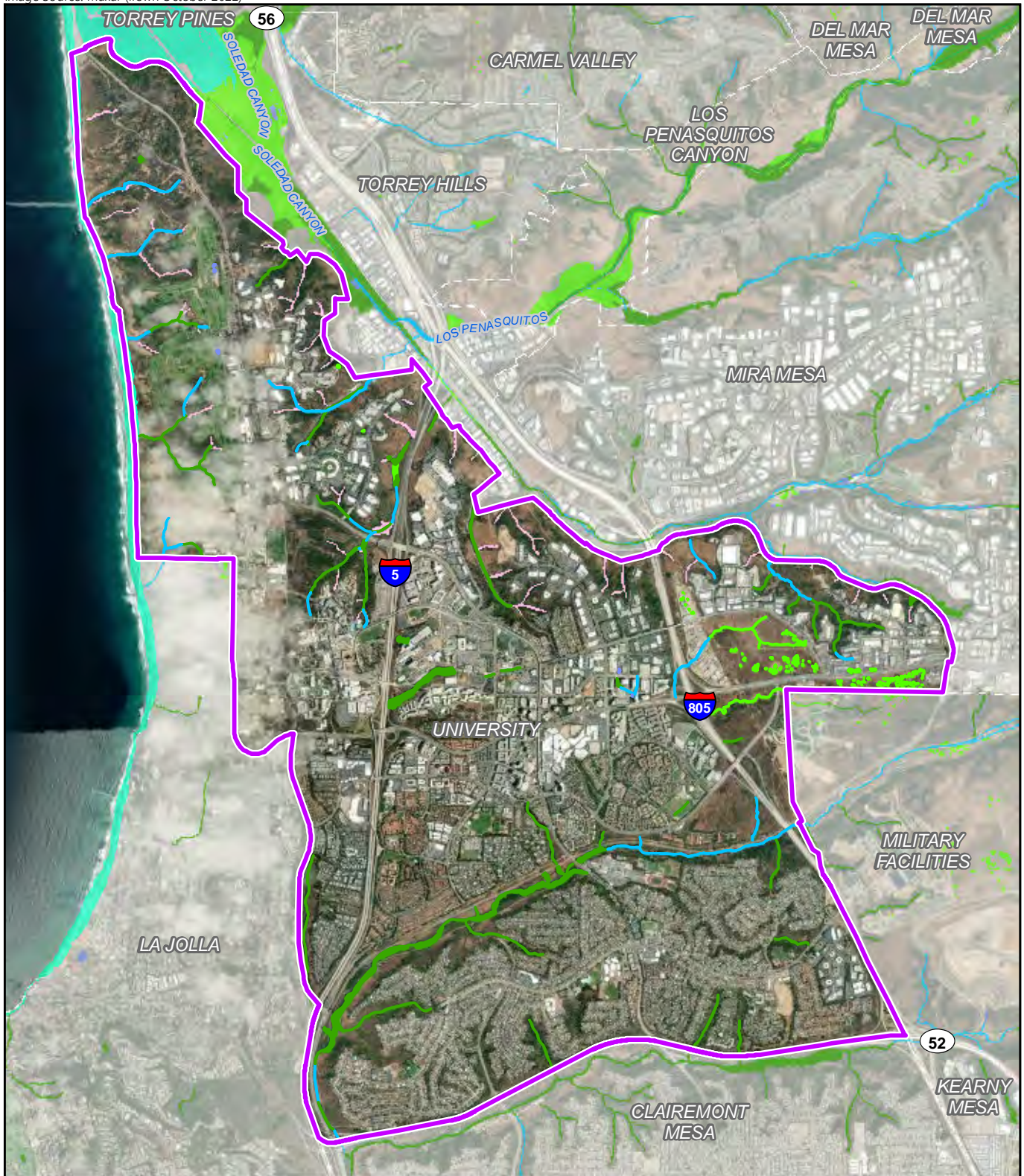


FIGURE 4.3-4e  
Potential Wetlands in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - Northeast












-  University Community Plan Update Area
-  Estuarine and Marine Wetland
-  Freshwater Emergent Wetland
-  Freshwater Forested/Shrub Wetland
-  Freshwater Pond
-  Riverine
-  Riparian



FIGURE 4.3-5  
Potential Wetlands in Relation to the  
University Community Plan Update Area

## b. Hillcrest Focused Plan Amendment

The Hillcrest FPA area is an urban area with no regional wildlife corridors. Canyons surrounding the Hillcrest FPA area provide local wildlife movement within urban canyons.

## c. University Community Plan Update

As detailed in Appendix D there are no designated wildlife corridors within the University CPU area. However, there are core biological resource areas that connect wildlife from inland to the coast. The University CPU area is located within the Northern Area and Urban Area as defined in the City's MSCP SAP. Los Peñasquitos Canyon, located east of the University CPU area is a regional corridor linking coastal habitats to inland habitats on Black Mountain and in Poway. The MHPA in the Northern Area is largely comprised of regional linkages leading to biological core areas within existing reserves and parks. Based on a review of the MSCP SAP, the canyon networks within the University CPU area are local wildlife movement corridors that expand on regional wildlife corridors including Los Peñasquitos Lagoon, Los Peñasquitos Canyon, and Lopez Canyon located immediately adjacent to the University CPU area to the north and west. The local canyon networks within the University CPU area are important to maintaining healthy plant and wildlife populations in the highly urbanized University CPU area by providing connectivity from the coast to natural areas further east which serve as regional wildlife corridors in the MSCP SAP. Torrey Pines State Natural Reserve and Los Peñasquitos Lagoon, located within and adjacent to the northernmost portion of the University CPU area, provide local wildlife movement and connections to regional wildlife movement opportunities. The habitats found within these open space and canyon areas allow local wildlife movement and provide connectivity from the Pacific Ocean and coastal region to inland open space.

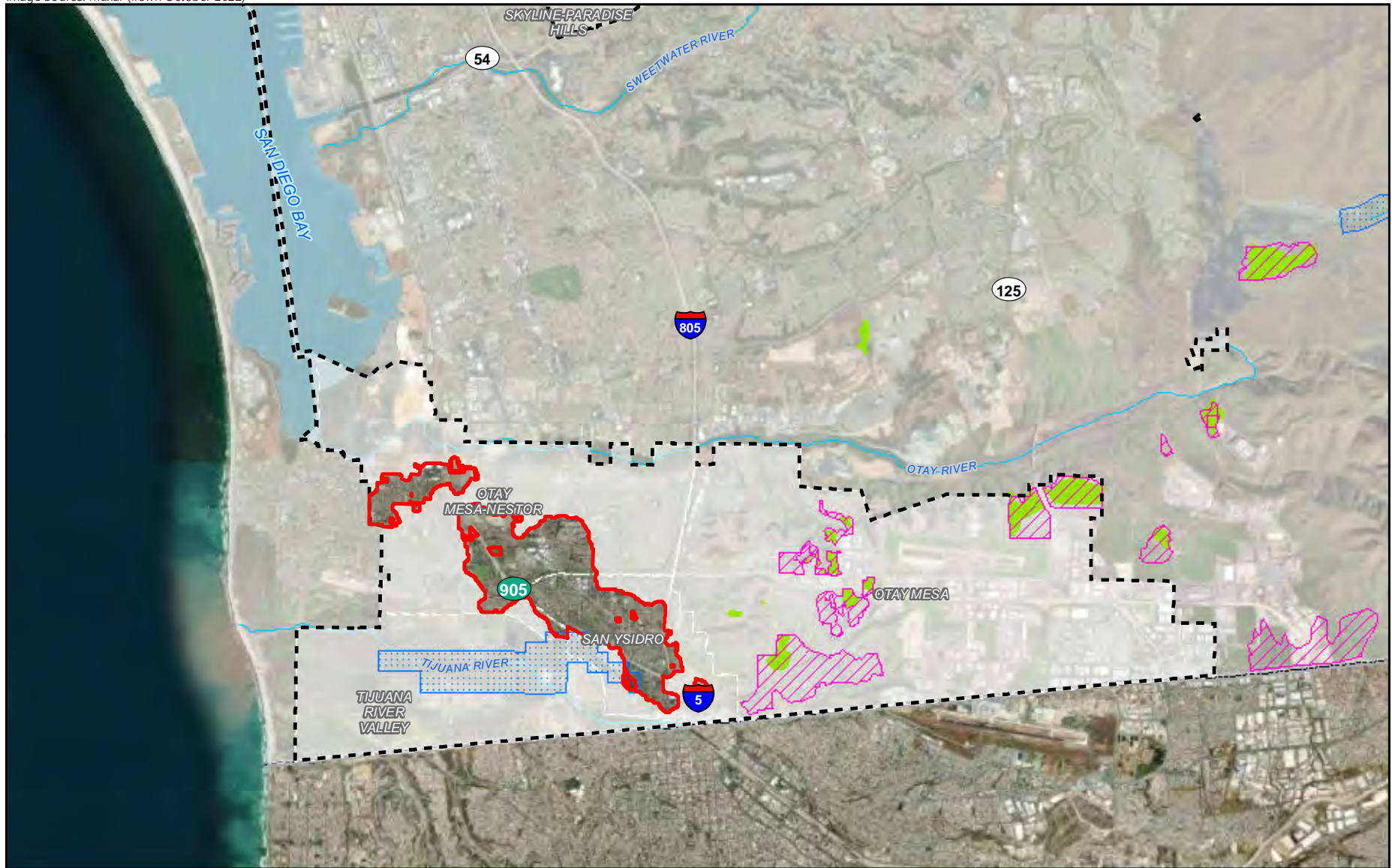
### 4.3.1.7 Critical Habitats






The U.S. Fish and Wildlife Service (USFWS) designates critical habitats which are areas that the agency determines are essential to its conservation. Critical habitats are identified for species proposed for listing as endangered or threatened under the ESA.

~~Although~~ The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The location of USFWS Critical Habitats in relation to the Climate Smart Village Areas are depicted on Figures 4.3-6a through 4.3-6d. The location of USFWS Critical Habitats in relation to the University CPU area are depicted in Figure 4.3-7.

As shown on these graphics and reported in Table 4.3-5, approximately 39 acres of the Climate Smart Village Areas overlap with USFWS critical habitat for least Bell's vireo and approximately one acre overlaps with San Diego Fairy Shimp critical habitat. No critical habitat is located within the Hillcrest FPA area. Approximately 38 acres of critical habitat for spreading navarretia (*Navarretia fossalis*) is located within the University CPU area.





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Least Bell's Vireo Critical Habitat
-  San Diego Fairy Shrimp Critical Habitat
-  Spreading Navarretia Critical Habitat

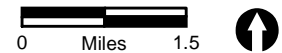
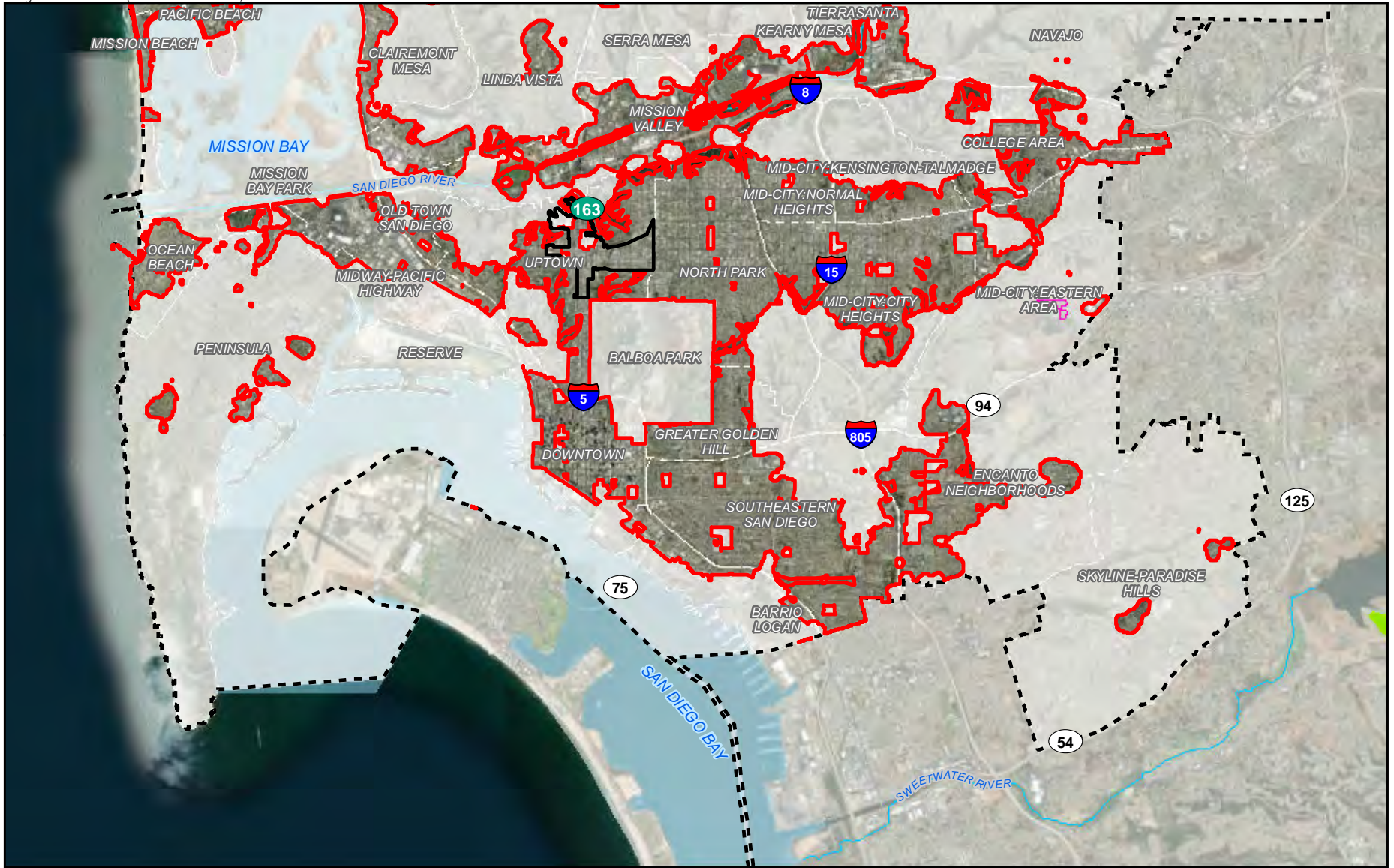







FIGURE 4.3-6a  
Critical Habitats in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South





-  Hillcrest Focused Plan Amendment Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  San Diego Fairy Shrimp Critical Habitat
-  Spreading Navarretia Critical Habitat

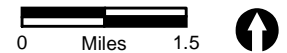
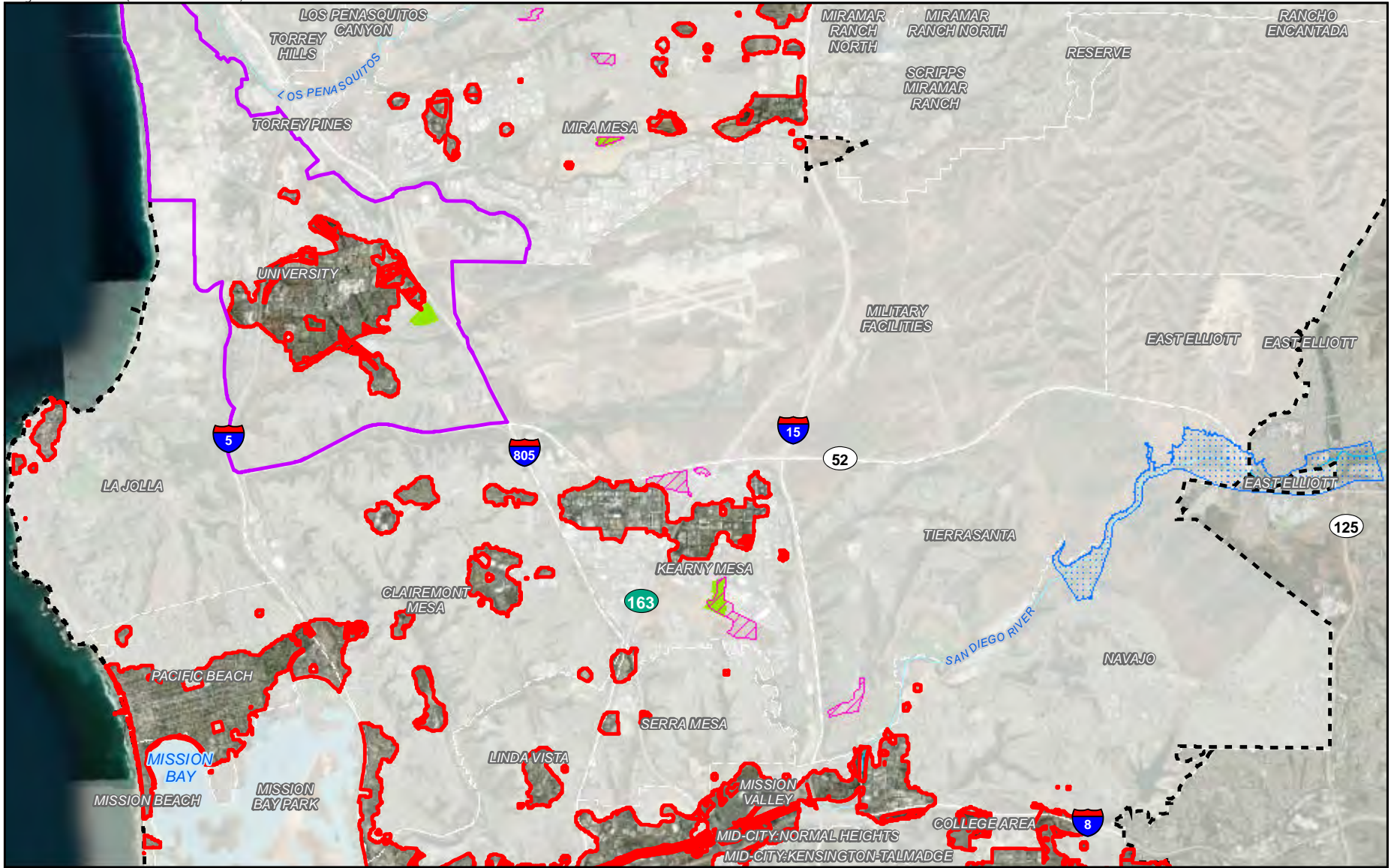








FIGURE 4.3-6b  
Critical Habitats in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Least Bell's Vireo Critical Habitat
-  San Diego Fairy Shrimp Critical Habitat
-  Spreading Navarretia Critical Habitat

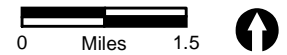
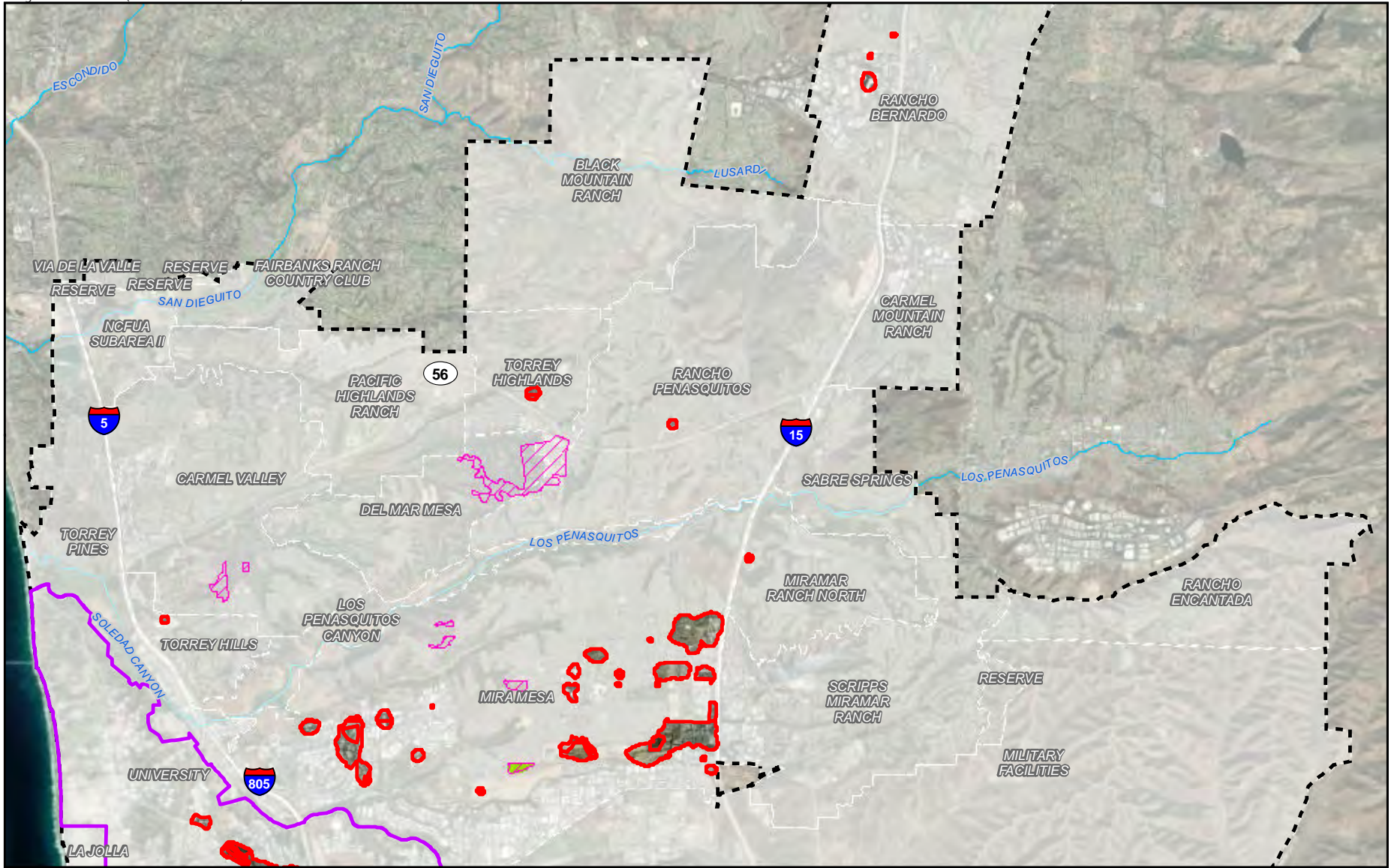







FIGURE 4.3-6c  
Critical Habitats in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  San Diego Fairy Shrimp Critical Habitat
-  Spreading Navarretia Critical Habitat

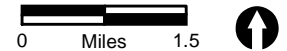
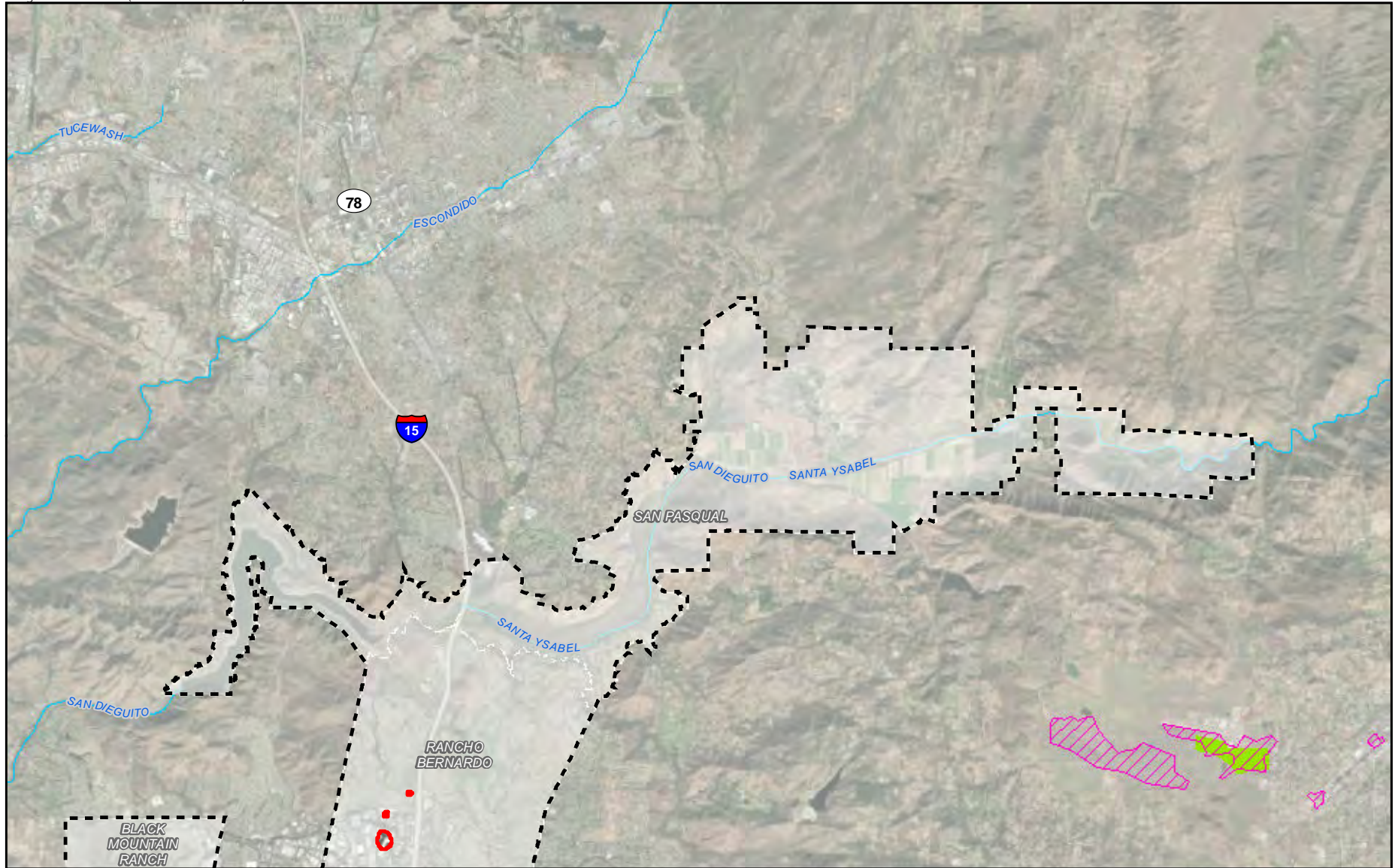






FIGURE 4.3-6d  
Critical Habitats in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  San Diego Fairy Shrimp Critical Habitat
-  Spreading Navarretia Critical Habitat

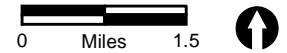





FIGURE 4.3-6e  
Critical Habitats in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - Northeast





-  University Community Plan Update Area
-  San Diego Fairy Shrimp Critical Habitat
-  Spreading Navarretia Critical Habitat

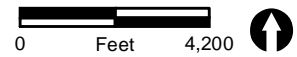


FIGURE 4.3-7  
Critical Habitats in Relation to the  
University Community Plan Update Area

USFWS Critical Habitat	Blueprint SD Initiative Climate Smart Village Areas (Acres)	Hillcrest FPA Area (Acres)	University CPU Area (Acres)
Least Bell's Vireo	39	-	-
San Diego Fairy Shrimp	1	-	-
Spreading Navarretia	0	-	38
SOURCE: USFWS			

## 4.3.2 Regulatory Setting

### 4.3.2.1 Federal Regulations

#### a. Endangered Species Act

The federal ESA, as amended (16 United States Code [USC] 1531 et seq.), provides for the listing of endangered and threatened species of plants and animals and the designation of critical habitat for listed animal species. The ESA also prohibits all persons subject to U.S. jurisdiction from “taking” endangered species, which includes any harm or harassment. Section 7 of the ESA requires that federal agencies, prior to project approval, consult with the USFWS and/or the National Marine Fisheries Service to ensure adequate protection of listed species that may be affected by the project.

#### b. Clean Water Act

The federal Water Pollution Control Act (also known as the Clean Water Act [CWA]) (33 USC 1251 et seq.), as amended by the Water Quality Act of 1987 (PL 1000-4), is the major federal legislation governing water quality. The purpose of the CWA is to “restore and maintain the chemical, physical, and biological integrity of the nation’s waters.” Discharges into waters of the U.S. are regulated under Section 404 of the CWA. Waters of the U.S. include: (1) all navigable waters (including all waters subject to the ebb and flow of tides); (2) all interstate waters and wetlands; (3) all other waters, such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sand flats, wetlands, sloughs, or natural ponds; (4) all impoundments of waters mentioned above; (5) all tributaries to waters mentioned above; (6) the territorial seas; and (7) all wetlands adjacent to waters mentioned above. In California, the State Water Resources Control Board (SWRCB) and the nine Regional Water Quality Control Boards (RWQCBs) are responsible for implementing the CWA. Important applicable sections of the CWA are discussed below.

- Section 303 requires states to develop water quality standards for inland surface and ocean waters and submit to the U.S. Environmental Protection Agency (U.S. EPA) for approval. Under Section 303(d), the state is required to list waters that do not meet water quality standards and to develop action plans, called total maximum daily loads, to improve water quality.

- Section 304 provides for water quality standards, criteria, and guidelines.
- Section 401 requires an applicant for any federal permit that proposes an activity that may result in a discharge to waters of the U.S. to obtain certification from the state that the discharge will comply with other provisions of the CWA. Certification is provided by the respective RWQCB.
- Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for the discharge of any pollutant (except for dredge or fill material) into waters of the U.S. The NPDES program is administered by the RWQCB. Conformance with Section 402 is typically addressed in conjunction with water quality certification under Section 401.
- Section 404 provides for issuance of dredge/fill permits by the U.S. Army Corps of Engineers (USACE). Permits typically include conditions to minimize impacts on water quality. Common conditions include USACE review and approval of sediment quality analysis before dredging, a detailed pre- and post-construction monitoring plan that includes disposal site monitoring, and required compensation for loss of waters of the U.S.

### **c. Migratory Bird Treaty Act**

The Migratory Bird Treaty Act (16 USC 703 et seq.), or MBTA, is a federal statute that implements treaties with several countries on the conservation and protection of migratory birds. The number of bird species covered by the MBTA is extensive and is listed at 50 CFR Section 10.13. The regulatory definition of “migratory bird” is broad and includes any mutation or hybrid of a listed species and any part, egg, or nest of such birds (50 CFR Section 10.12). The MBTA, which is enforced by USFWS, makes it unlawful “by any means or in any manner, to pursue, hunt, take, capture, [or] kill” any migratory bird, or attempt such actions, except as permitted by regulation. The take, possession, import, export, transport, sale, purchase, barter, or offering of these activities is prohibited, except under a valid permit or as permitted in the implementing regulations (50 CFR Section 21.11). Pursuant to U.S. Department of the Interior Memorandum M-37050, the MBTA is no longer interpreted to cover incidental take of migratory birds (U.S. Department of the Interior 2017). Therefore, impacts that are incidental to implementation of an otherwise lawful project would not be considered significant.

### **d. U.S. Army Corps of Engineers**

The USACE has primary federal responsibility for administering regulations that concern waters and wetlands. In this regard, the USACE acts under two statutory authorities, the Rivers and Harbors Act (33 USC, Sections 9 and 10), which governs specified activities in navigable waters, and the CWA (Section 404), which governs specified activities in waters of the U.S., including wetlands and special aquatic sites. Wetlands and non-wetland waters (e.g., rivers, streams, and natural ponds) are a subset of waters of the U.S. and receive protection under Section 404 of the CWA. The USACE has primary federal responsibility for administering regulations that concern waters and wetlands in the project area under statutory authority of the CWA (Section 404). In addition, the regulations and policies of various federal agencies mandate that the filling of wetlands be avoided to the maximum

extent feasible. The USACE requires obtaining a permit if a project proposes placing structures within navigable waters and/or alteration of waters of the U.S.

### 4.3.2.2 State Regulations

#### a. California Endangered Species Act

Similar to the federal ESA, the California ESA of 1970 provides protection to species considered threatened or endangered by the State of California (California Fish and Game Code, Section 2050 et seq.). The California ESA recognizes the importance of threatened and endangered fish, wildlife, and plant species and their habitats, and prohibits the taking of any endangered, threatened, or rare plant and/or animal species unless specifically permitted for education or management purposes.

#### b. California Fish and Game Code

The California Fish and Game Code regulates the handling and management of the state's fish and wildlife. Most of the code is administered or enforced by the CDFW (before January 1, 2013, California Department of Fish and Game).

- Section 1602 regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats associated with watercourses. Jurisdictional waters are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. CDFW jurisdiction does not include tidal areas or isolated resources.
- Under Section 3503 of the California Fish and Game Code, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.3-5 of the Code prohibits the take, possession, or destruction of any birds in the orders Falconiformes (raptors) or Strigiformes (owls), or of their nests and eggs (State of California 1991).

#### c. Porter-Cologne Water Quality Act

The Porter-Cologne Water Quality Act of 1969, updated in 2012 (California Water Code, Section 13000 et seq.), established the principal California legal and regulatory framework for water quality control. The act is embodied in the California Water Code. The California Water Code authorizes the SWRCB to implement the provisions of the federal CWA. The State of California is divided into nine regions governed by their respective RWQCB. The RWQCBs implement and enforce provisions of the California Water Code and CWA under the oversight of the SWRCB.

### 4.3.2.3 Local Regulations

For a discussion of the MSCP, the City's MSCP SAP, and the VPHCP, refer to Section 4.10.2.2h and i.



## a. City of San Diego Environmentally Sensitive Lands Regulations

The purpose of the Environmentally Sensitive Lands (ESL) Regulations is to protect, preserve, and where damaged, restore the environmentally sensitive lands of San Diego and the viability of the species supported by those lands. These regulations are intended to ensure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect the public health, safety, and welfare while employing regulations that are consistent with sound resources conservation principles and the rights of private property owners.

The ESL Regulations cover sensitive biological resources, including wetlands, within and outside of the coastal zone and MHPA. In addition to protecting wetlands, the ESL Regulations require a wetland buffer be maintained around all wetlands as appropriate to protect the functions and values of the wetland. Section 320.4(b)(2) of the USACE General Regulatory Policies (33 CFR 320-330) list criteria for consideration when evaluating wetland functions and values. These include wildlife habitat (spawning, nesting, rearing, and foraging), food chain productivity, water quality, ground water recharge, and areas for the protection from storm and floodwaters.

It is further intended for the ESL Regulations and accompanying Biology, Steep Hillside, and Coastal Bluffs, and Beaches Guidelines to serve as standards for the determination of impacts and mitigation under CEQA and the California Coastal Act. These standards also serve to implement the MSCP by placing priority on the preservation of biological resources within the MHPA, as identified in the City's SAP. The habitat-based level of protection that results through implementation of the MHPA is intended to meet the mitigation obligations of the Covered Species addressed.

During City review of a ministerial permit application, City staff evaluates proposed projects for the presence of ESL. Specifically, SDMC Section 143.0113 states, "(a) In connection with any permit application for development on a parcel, the applicant shall provide the information used to determine the existence and location of environmentally sensitive lands in accordance with Section 112.0102(b). (b) Based on a project-specific analysis and the best scientific information available, the City Manager shall determine the existence and precise location of environmentally sensitive lands on the premises." At the time of a request for a building permit or other ministerial project application where the presence of ESL is in question, City staff would request evidence to confirm the presence or absence of ESL. If ESL is present and would be impacted by the proposed project, the project would be required to obtain a discretionary permit as detailed in SDMC Table 143-01A, Applicability of Environmentally Sensitive Lands Regulations.



## b. City of San Diego Biology Guidelines

Pursuant to the SDMC (Chapter 11, Article 3, Division 1) and the City's Biology Guidelines (2018), sensitive biological resources refer to upland and/or wetland areas that meet any one of the following criteria:

- a) Lands that have been included in the MSCP Preserve (i.e., the MHPA);
- b) Wetlands [as defined by SDMC Chapter 11, Article 3, Division 1];
- c) Lands outside the MHPA that contain Tier I, Tier II, Tier IIIA, or Tier IIIB habitats;
- d) Lands supporting species or subspecies listed as rare, endangered, or threatened under Section 670.2 or 670.5, Title 14, CCR; or the federal ESA, 50 CFR Section 17.11 or 17.12; or candidate species under the CCR;
- e) Lands containing habitats with MSCP narrow endemic species as listed in the City's Biology Guidelines; or
- f) Lands containing habitats of MSCP Covered Species as listed in the City's Biology Guidelines.

The City defines Tier 1 habitats as rare uplands including southern foredunes, Torrey pines forest, coastal bluff scrub, maritime succulent scrub, maritime chaparral, scrub oak chaparral, native grassland, and oak woodlands. Tier II habitats include coastal sage scrub and chaparral. Tier IIIA habitats include mixed chaparral and chamise chaparral. Tier IIIB habitats include non-native grasslands. Tier IV habitats include disturbed land, agriculture, eucalyptus woodland, and ornamental plantings. The City's Biology Guidelines identify required mitigation ratios for each habitat tier based on the location of impact and the location of mitigation being within or outside the MHPA.

## c. Wetland Regulations

The extent of City of San Diego's wetland jurisdiction is determined based on the definition of "wetland" provided under the ESL Regulations (SDMC Section 143.0141[b]) and Biology Guidelines, which defines wetlands as areas which are characterized by any of the following conditions:

- All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools;
- Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historical wetland vegetation or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats;

- Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands;
- Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).

Furthermore, the ESL Regulations state that wetlands impacts should be avoided, and unavoidable impacts should be minimized to the maximum extent practicable. Where impacts are unavoidable, deviation findings under the Biologically Superior Option must be made in accordance with SDMC Section 143.0150. In addition to protecting wetlands, the ESL Regulations require that a buffer be maintained around wetlands, as appropriate, to protect wetland-associated functions and values.

The City of San Diego uses the criteria listed in Section 320.4(b)(2) of the USACE General Regulatory Policies (33 CFR 320–330) to apply an appropriate buffer around wetlands that serves to protect the function and value of the wetland. According to the City's Biology Guidelines, a wetland buffer is an area surrounding a wetland that helps protect the function and value of the adjacent wetland by reducing physical disturbance; provides a transition zone where one habitat phases into another; and acts to slow floodwaters for flood and erosion control, sediment filtration, water purification, and groundwater recharge. The width of the buffer is determined by factors such as type and size of development, sensitivity of the wetland resource to edge effects, topography, and the need for upland transition (City of San Diego 2018). There are no set buffer widths required for wetlands delineated outside the Coastal Zone.

#### **d. City of San Diego General Plan Conservation Element**

The City's General Plan establishes citywide policies to be cited in conjunction with a community plan. The General Plan presents goals and policies for biological resources in the Conservation Element, which generally aim to: protect and conserve the landforms, canyon lands, and open spaces; limit development of floodplains and sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands; manage and/or minimize runoff, sedimentation, and erosion due to construction activity in order to improve watershed management and water quality; manage wetland areas for natural flood control and preserve wetland areas; preserve areas within the MSCP and implement the goals and policies of the City's MSCP SAP; support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions, and values; and to work with private, state, and federal organizations or people in order to implement an effective wetland management system. The Blueprint SD Initiative includes updates to the Conservation Element of the City's General Plan to recognize adoption of the VPHCP, add policies to support preparation of Natural Resource Management Plans on all managed preserve lands, and other changes to reflect current City goals as it relates to biological resources and City management of such resources.

The **Conservation Element** (CE) of the City's of San Diego General Plan (City of San Diego 202418) including proposed policy updates, contains the following biological resource related policies applicable to the project:

- **CE-B.1.** Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.
  - [a. through f.]
  - g. Protect, restore and preserve wetland and upland areas on City managed lands, prioritizing areas with the greatest needs.
  - h. Prepare and update Natural Resource Management Plans on all managed preserved lands and include in plans considering shifting habitat or conditions due to climate change as well as sequestration potential, as the information becomes available.
- **CE-B.2.** Apply the appropriate zoning and ESL regulations to limit development of floodplains, sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands.
- **CE-B.9.** Provide opportunities to preserve, enhance, and expand the open space network to support uses such as habitat, recreation, natural resources, historic and tribal resources, water management, and aesthetics, consistent with Biodiverse SD and Climate Resilient SD.
- **CE-E.2.** Apply water quality protection measures to land development projects early in the process – during project design, permitting, construction, and operations – in order to minimize the quantity of runoff generated on-site, the disruption of natural water flows, and the contamination of storm water runoff.
  - Increase on-site infiltration, and preserve, restore, or incorporate natural drainage systems into site design.
  - Direct concentrated drainage flows away from the MHPA and open space areas. If not possible, drainage should be directed into sedimentation basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas.
  - Reduce the amount of impervious surfaces through selection of materials, site planning, and street design where possible.
  - Increase permeable areas for new trees and restore spaces that have been paved, focused in areas with the greatest needs.
  - Increase the use of plants/vegetation in drainage design.
  - Maintain landscape design standards that minimize the use of pesticides and herbicides.

- Avoid development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforce regulations that minimize their impacts.
- Apply land use, site development, and zoning regulation that limit impacts on and protect the natural integrity of topography, drainage systems, and water bodies.
- Enforce maintenance requirements in development permit conditions.
- Increase the use of green infrastructure, both at watershed scale and site-specific locations.
- **CE-G.1.** Preserve natural habitats pursuant to the MSCP and VPHCP, preserve rare plants and animals to the maximum extent practicable, and manage all City-owned native habitats to ensure their long-term biological viability.
- **CE-G.3.** Implement the conservation goals/policies of the City's MSCP SAP and VPCHP, such as providing connectivity between habitats and limiting recreational access and use to appropriate areas.
- **CE-G.5.** Promote aquatic biodiversity and habitat recovery by reducing hydrological alterations, such as grading a stream channel.
- **CE-G.6.** Utilize programs, such as Biodiverse SD, to preserve habitat and open space in core biological resource areas, mitigating impacts of new development while maintaining conservation goals.
- **CE-G.7.** Preserve the network of habitat and open space through delineation of core biological resource areas identified in the Multi-Habitat Planning Area (MHPA) consistent with the City's Biodiverse SD program, inclusive of the VPHCP, and MSCP, which acts as the natural communities conservation program.
- **CE-H.4.** Support the long-term monitoring of restoration and mitigation efforts to track and evaluate changes in wetland acreage, functions and values.
- **CE-H.5.** Restore salt marshland and other associated tidal wetland and riparian habitats where feasible.

### 4.3.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to biological resources are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City's CEQA California Environmental Quality Act Significance Determination Thresholds (2022). The following issue questions are addressed in this section: -

1. Would the project have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the Multiple Species Conservation Program (MSCP), Vernal Pool Habitat Conservation Plan

(VPHCP) or other local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

2. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
3. Would the project have a substantial adverse effect on federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?
4. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
5. Would the project conflict with the provisions of the MSCP, VPHCP, or another an-adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, such as introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects or introduce invasive species of plants into a natural open space area?

## 4.3.4 Impact Analysis

### Issue 1 Sensitive Species

*Would the project have ~~a~~ substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP, VPHCP, or other local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

#### a. Sensitive Plant Species

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative Climate Smart Village Areas. ~~Although~~ The Blueprint SD Initiative's' policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas.

As discussed in Section 4.3.1.3, eight sensitive plant species have the potential to occur within the Blueprint SD Initiative's Climate Smart Village Areas and no sensitive plant species have the potential to occur within the Hillcrest FPA area. Other sensitive plant species may be present throughout the

City within the Climate Smart Village Areas and the Hillcrest FPA area including but not limited to those listed in Table 4.3-2. As detailed in Table 4.3-2 and in the Biological Resources Report for the University CPU (see Appendix D), 47 sensitive plant species have the potential to occur in the University CPU area, and 38 of those species are known to occur.

Implementation of the Blueprint SD Initiative would increase development intensities that support higher density residential development and mixed-use development within the Climate Smart Village Areas, which are generally urbanized areas that have access to existing or planned transit. Implementation of the Hillcrest FPA and University CPU would also increase residential and non-residential capacity within the FPA and CPU areas. Sensitive plant species habitat in the City is typically concentrated in areas designated as Open Space that may be located within the MHPA. Although development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to occur within urban areas that are already developed with commercial, industrial, residential, or employment uses where there is a low potential to support extensive sensitive plant species habitat, the details of future site-specific projects are unknown at this time, and it is possible that some project areas may support sensitive plant species and their habitats.

As future projects are proposed in areas containing sensitive plant species habitat, site specific surveys in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP ~~ESL Regulations and Biology Guidelines~~ will be required to determine the potential of occurrence of sensitive plant species in the project area. Impacts to sensitive plant species would be mitigated and/or conserved in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP ~~ESL Regulations, Biology Guidelines, and the provisions of the MSCP SAP and VPHCP~~. Depending on the species present, adherence to the MSCP SAP Appendix A (i.e., Conditions of Coverage), the VPHCP, and state and federal laws will provide mitigation for direct impacts to sensitive plant species. Additionally, according to the City's Biology Guidelines, "Lands outside the MHPA containing narrow endemic species will be treated as if the land was inside the MHPA for purposes of mitigation" (City of San Diego 2018). As future site-specific projects are proposed, implementation of the City's regulatory framework for addressing biological resources impacts including the ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP ~~MSCP SAP, VPHCP, ESL Regulations, and Biology Guidelines~~ would reduce potential impacts to sensitive plant species. However, at a program level of review and in the absence of project-specific analysis, it is unknown whether all impacts to sensitive plant species would be fully mitigated to a less than significant level. Therefore, at the program level of review, impacts to sensitive plant species resulting from project implementation would be significant.

## **b. Sensitive Wildlife Species**

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative Climate Smart Village Areas. ~~Although~~ The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas. Therefore,

potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas due to land use changes being focused within these areas.

As discussed in Section 4.3.1.4, ~~126~~ sensitive wildlife species have the potential to occur within the Blueprint SD Initiative's Climate Smart Village Areas and ~~one-three (43)~~ sensitive ~~plant-wildlife~~ species have the potential to occur within the Hillcrest FPA area. Other sensitive wildlife species, such as Crotch's Bumble Bee, may be present throughout the City including within the Climate Smart Village Areas, and the Hillcrest FPA area, and University CPU area, including but not limited to those listed in Table 4.3-3. As detailed in the Biological Resources Report for the University CPU (see Appendix D), 247 sensitive plant-wildlife species are present within the University CPU area and 13 have the potential to occur in the University CPU area, and 38 of those species are known to occur.

Although no development is proposed at this time, implementation of the Blueprint SD Initiative would allow for increased development intensities that support higher density residential development and mixed-use development within the Climate Smart Village Areas, which are generally urbanized areas that have access to existing or planned transit. Implementation of the Hillcrest FPA and University CPU would also allow for increased residential and non-residential capacity within the FPA and CPU areas. Sensitive wildlife species in the City are typically concentrated in areas designated as Open Space that may be located within the MHPA. Although development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to occur within urban areas that are already developed with commercial, industrial, residential, or employment uses where there is a low potential to support extensive sensitive wildlife species, the details of future site-specific projects are unknown at this time, and it is possible that some project areas may support sensitive wildlife species.

Per the City's Biology Guidelines, habitats supporting plant or animal species which have been listed or proposed for listing by the federal or state government as rare, endangered, or threatened ("listed species") are also considered sensitive biological resources under the City's ESL Regulations (City of San Diego 2018). As future projects are proposed in areas containing sensitive wildlife species, site specific surveys in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP-ESL Regulations and Biology Guidelines will be required to determine the potential of occurrence of sensitive wildlife species in the project area. Impacts to sensitive wildlife species would be mitigated and/or conserved in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP-ESL Regulations, Biology Guidelines, and the provisions of the MSCP SAP and VPHCP. Depending on the species present, adherence to the MSCP SAP Appendix A (i.e., Conditions of Coverage), the VPHCP, and state and federal laws will provide mitigation for direct impacts to sensitive wildlife species. Additionally, according to the City's Biology Guidelines, "Lands outside the MHPA containing narrow endemic species will be treated as if the land was inside the MHPA for purposes of mitigation" (City of San Diego 2018).

Furthermore, the Migratory Bird Treaty Act, which is enforced by USFWS, makes it unlawful "by any means or in any manner, to pursue, hunt, take, capture, [or] kill" any migratory bird or attempt such actions, except as permitted by regulation. Thus, there is an existing regulatory framework in place to prevent adverse impacts to migratory birds. Future development occurring within the project areas that has the potential to impact migratory birds would be required to conduct preconstruction



surveys if construction occurs during the typical bird breeding season to determine the presence or absence of breeding birds and to ensure that no impacts occur to any nesting birds or their eggs, chicks, or nests. Additionally, future development would be required to comply with the MSCP Subarea Plan and would require letter reports or surveys for future projects occurring within or adjacent to the MHPA or for sites that contain sensitive habitat as defined by the Biology Guidelines. Projects within or adjacent to the MHPA are required to comply with MHPA Land Use Adjacency Guidelines and these guidelines and preconstruction surveys for bird species are included as conditions of project approval and are provided on construction and grading plans. For future projects located in areas within close proximity to areas with known vernal pool resources, implementation of the VPHCP Section 5.2.1 Minimization and Avoidance Measures are required and would be assured as conditions of project approval for ministerial and discretionary projects.

As future site-specific projects are proposed, implementation of the City's regulatory framework for addressing biological resources impacts including the ~~MSCP SAP, VPHCP, ESL Regulations and Biology Guidelines~~ City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP would reduce potential impacts to sensitive wildlife species. However, at a program level of review and in the absence of project-specific analysis, it is unknown whether all impacts to sensitive wildlife species would be fully mitigated to a less than significant level. Therefore, at the program level of review, impacts to sensitive wildlife species resulting from project implementation would be significant.

### **c. Critical Habitats**

Critical habitat for species regulated by the federal ESA is designated by USFWS in areas deemed essential for the conservation and/or recovery of the species. Critical habitat areas often require special management and protection to assure they will remain suitable for the federally listed species for which they have been designated. Projects proposed within or adjacent to critical habitat must demonstrate that implementation of the project would not destroy or have a significant impact on the functions and values of the critical habitat.

As detailed in Section 4.3.1.6, the Blueprint SD Initiative Climate Smart Village Areas, Hillcrest FPA area, and University CPU area intersect with critical habitats. Figures 4.3-6a through 4.3-6d and Table 4.3-5, depict the location and acreages of critical habitats within the project areas. Approximately 39 acres of the Climate Smart Village Areas are located within USFWS critical habitat for Least bell's vireo and approximately one acre of the Climate Smart Village Areas are located within San Diego Fairy Shimp critical habitat. No critical habitat is located within the Hillcrest FPA area. Approximately 38 acres of critical habitat for spreading navarretia is located within the University CPU area.

Development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to occur within developed urban areas that have been previously disturbed and have existing commercial, industrial, residential, or employment uses. While development under the project is not anticipated to affect critical habitats, at a program level of review, the specific locations of development and resources present cannot be known with certainty.

Future development anticipated under the project that could potentially impact designated critical habitat would be required to comply with the applicable avoidance, minimization, and mitigation measures of the MSCP SAP and VPHCP, as well as the regulatory requirements of the City's ESL

Regulations, Biology Guidelines, MSCP SAP, and VPHCP. ~~the MSCP SAP, ESL Regulations, and Biology Guidelines.~~ As future site-specific projects are proposed, implementation of the City's regulatory framework for addressing biological resources impacts including the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP ~~MSCP SAP, VPHCP, ESL Regulations and Biology Guidelines~~ would reduce potential impacts to designated critical habitats. However, at a program level of review and in the absence of project-specific analysis, it is not possible to ensure all impacts could be fully mitigated to a less than significant level. Therefore, at the program level of review, impacts to critical habitat would be significant.

## Issue 2 Sensitive Habitats

*Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

The City's Biology Guidelines define sensitive vegetation communities. Upland vegetation communities are divided into four tiers of sensitivity (the first being the most sensitive; the fourth, the least sensitive) based on rarity and ecological importance (City of San Diego 2018). Tier I includes rare uplands, Tier II includes uncommon uplands, Tiers IIIA and IIIB include common uplands, and Tier IV includes other uplands. Wetlands and waters of the United States are also considered sensitive habitats/communities but are not assigned tier values. Additionally, vegetation or land cover types may be deemed sensitive in certain areas if they support a sensitive species such as a burrowing owl or rare/narrow endemic plant species.

The Blueprint SD Initiative's' policy and land use framework would apply citywide and future development and associated impacts could occur citywide.; ~~Nevertheless,~~ however, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. As shown in Table 4.3-1 and Figures 4.3-1a through 4.3-1e and 4.3-2 through 4.3-5, the Blueprint SD Initiative Climate Smart Village Areas, Hillcrest FPA area, and University CPU area support sensitive upland vegetation communities and wetland communities. While the majority of the Climate Smart Village Areas consist of developed or disturbed land cover types, some sensitive uplands and wetlands are present. The Hillcrest FPA area is primarily developed but contains approximately 9 acres of mapped sensitive habitat located primarily along canyon edges in the northwestern portion of the FPA area. The University CPU area supports sensitive vegetation communities, including wetland communities and sensitive upland vegetation communities. Development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to occur within developed urban areas that have been previously disturbed and have existing commercial, industrial, residential, or employment uses. While development under the project is not anticipated to affect sensitive habitats, it is possible that some project areas may support sensitive habitats.

Future site-specific development consistent with the proposed project could have a significant impact on Tier I, Tier II, Tier IIIA, and Tier IIIB sensitive biological resources (i.e., sensitive upland communities), as well as wetlands. Lands designated as Tier IV are not considered to have significant habitat value and impacts would not be ~~considered~~ significant (City of San Diego 2018). While most

of these sensitive vegetation communities are present within areas that are designated as Open Space, ESL, or are within the MHPA and would be preserved from future development, there are some areas where planned land uses could potentially result in direct or indirect impacts to these communities. Such impacts could occur directly through removal or indirectly by placing development adjacent to sensitive vegetation communities. Future site-specific development under the project would undergo environmental review if any ESL is present to ensure consistency with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCPMSCP SAP, VPHCP, Biology Guidelines, and ESL regulations. If future site-specific development is proposed adjacent to the MHPA, implementation of the MSCP MHPA land use adjacency guidelines would be required. All future development including discretionary and ministerial development would be required to demonstrate compliance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCPESL Regulations, Biology Guidelines, VPHCP and MSCP SAP, as applicable, prior to ground disturbance. Further, future site-specific development under the proposed project must address the MHPA Land Use Adjacency Guidelines during either the planning (new development) or management (new and existing development) stages to minimize land use impacts and maintain the function of the MHPA (City of San Diego 1997). Per the MHPA Land Use Adjacency Guidelines, management strategies related to site drainage, lighting, noise, toxics, barriers, invasives, brush management, and grading/land development are required for development within or adjacent to the MHPA in order to avoid impacts to the MHPA. Mitigation for sensitive biological resources involves "compensating" for impacts through off-site acquisition, on-site preservation, habitat restoration, or in limited cases, monetary compensation. Refer to Section 4.3.2, Regulatory Framework, of this PEIR for a complete discussion of the applicable plans and regulations related to biological resources.

Required compliance with the established development standards contained in the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCPESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP would reduce potential impacts on sensitive vegetation communities resulting from future development. However, at a program level of review without project-specific development proposals, it is cannot be guaranteed that every impact to sensitive habitats can be fully mitigated to a less than significant level. Therefore, at the program level of review, impacts to sensitive habitats would be significant.

### Issue 3 Wetlands

*Would the project have substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means?*

-Development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to be focused within developed urban areas that have been previously disturbed and have existing commercial, industrial, residential, or employment uses. While development under the project is not anticipated to affect wetlands, it is possible that some future development areas may contain wetland resources.

As shown in Tables 4.3.1 and 4.3-4, the Climate Smart Village Areas and the University CPU area contain wetland communities. There are no wetland communities within the Hillcrest FPA area. While most of these wetland communities occur within areas that would be designated as Open

Space within the MHPA and would not be suitable for development, there are some areas where planned land uses could potentially result in direct or indirect impacts on wetland communities or other jurisdictional areas. Jurisdictional areas refer to waters under federal and state agency jurisdiction (e.g., ~~USACE~~ U.S. Army Corps of Engineers, USFWS, CDFW), which include wetlands and isolated waters in some cases. The City has its own definition of wetlands that is separate from the jurisdictional determinations that would ultimately be required from wetland regulatory agencies. The City's wetland definition is defined in the City's LDC with additional guidance provided in the Biology Guidelines.

As detailed in SDMC Section 113.0103, the City defines wetlands as areas which are characterized by any of the following conditions:

- (a) All areas persistently or periodically containing naturally occurring wetland vegetation communities characteristically dominated by hydrophytic vegetation, including but not limited to salt marsh, brackish marsh, freshwater marsh, riparian forest, oak riparian forest, riparian woodlands, riparian scrub, and vernal pools;
- (b) Areas that have hydric soils or wetland hydrology and lack naturally occurring wetland vegetation communities because human activities have removed the historic wetland vegetation or catastrophic or recurring natural events or processes have acted to preclude the establishment of wetland vegetation as in the case of salt pannes and mudflats;
- (c) Areas lacking wetland vegetation communities, hydric soils and wetland hydrology due to non-permitted filling of previously existing wetlands;
- (d) Areas mapped as wetlands on Map No. C-713 as shown in Chapter 13, Article 2, Division 6 (Sensitive Coastal Overlay Zone).

The City's definition differentiates between naturally occurring wetlands and wetlands intentionally created by human actions, from areas with wetlands characteristics unintentionally resulting from human activities in historical non-wetland areas. With the exception of wetlands created for the purpose of providing wetland habitat or resulting from human actions to create open waters or from the alteration of natural stream courses, areas demonstrating wetland characteristics, which are artificially created are not considered wetlands. The determination of a wetland shall take into account regional precipitation cycles, all adopted scientific, regulator, and technological information available from the state and federal resource agencies.

The ESL Regulations (SDMC Section 143.01419(b)) requires that a project's impacts on wetlands be avoided, and that a wetland buffer be established to maintain the wetland functions and values. Impacts on wetlands within the MHPA require a deviation to the ESL Regulations per SDMC Section 143.0141(a)(5)(c). A deviation to the ESL Regulations is not required for encroachments into vernal pools outside of the MHPA (and Coastal Overlay Zone) where the development is consistent with the Biology Guidelines of the LDM and the VPHCP. Future development that would have an impact on wetlands could require a deviation from the ESL Regulations under one or more of the following three options:

- Essential Public Project Option: a deviation may be requested for any public project identified in an adopted land use plan or implementing document and identified on the Essential Public Projects List adopted by Resolution No. R-307377 as Appendix III to the Biology Guidelines; linear infrastructure, including but not limited to major roads and land use plan circulation element roads and facilities including bike lanes, water and sewer pipelines including appurtenances, and storm water conveyance systems including appurtenances; maintenance of existing public infrastructure; or State and federally mandated projects. A deviation may only be requested for an Essential Public Project where no feasible alternative exists that would avoid impacts to wetland.
- Economic Viability Option: A deviation may be requested to preserve economically viable use of a property that would otherwise be deprived by a strict application of the regulations. Such a deviation shall be the minimum necessary to achieve economically viable use of the property and shall avoid wetland resources to the maximum extent practicable.
- Biologically Superior Option: A deviation may be requested to achieve a superior biological result which would provide long-term biological benefit and a net increase in quality and viability (functions and value) relative to existing conditions.

The determination of exact impacts on wetlands cannot be made at the programmatic level but would be determined as future site-specific development/redevelopment occurs and identifies existing potential wetland resources and jurisdictional wetlands consistent with the requirements of the federal and state agencies, ESL Regulations, and Biology Guidelines. At a project level of review, as future-site specific development/redevelopment proposals occur, it is anticipated that the City's regulatory framework would be adequate to ensure that potential impacts are avoided, minimized, mitigated or a wetland deviation has been approved (outside of the coastal zone) so that no net loss of wetlands would result from development. For example, per the City's MSCP SAP, ESL Regulations and Biology Guidelines, mitigation for sensitive biological wetland resources involves prioritizing avoidance and minimization of future impacts, compensatory measures that would result in a biologically superior net gain in overall function, and restoring or creating wetlands per Table 2a of the Biology Guidelines. Potential future site-specific projects that may impact vernal pools require additional mitigation requirements as outlined in the ESL Regulations and Biology Guidelines. ~~"compensating" for impacts through off-site acquisition, on-site preservation, habitat restoration, or in limited cases, monetary compensation.~~ Within the coastal zone, impacts to wetlands shall be avoided and only those uses identified in Section 143.0130(d) of the ESL Regulations shall be permitted which are limited to aquaculture, nature study projects or similar resource dependent uses, wetland restoration projects and incidental public service projects. Such impacts to wetlands shall occur only if they are unavoidable, the least environmentally-damaging feasible alternative, and adequate mitigation is provided. In general, the City and regulatory agencies maintain a no net loss wetland policy to ensure this resource is not further impacted over time. ~~However, a~~ At a program level of review without project-specific development proposals, it cannot be guaranteed that every potential impact to wetlands can be fully mitigated to a less than significant level. Therefore, a conservative analysis of future development is anticipated to result in wetland impacts, which would be considered a significant impact, and without any project level information, it cannot be guaranteed that all future projects would be able reduce their wetland impacts to a less than significant level.

In addition to the City regulatory requirements, all impacts on wetlands or other jurisdictional areas would be subject to regulation by the U.S. Army Corps of Engineers USACE in accordance with Section 404 of the CWA, RWQCB Regional Water Quality Control Board in accordance with Section 401 of the CWA, and CDFW under Section 1600 of California Fish and Game Code, as applicable. A conservative analysis of future development is anticipated to result in wetland impacts, which would be considered a significant impact. As no specific projects have been identified, it cannot be guaranteed that every future project would be able to demonstrate no net loss of wetland habitat. Therefore, at a program level of review, impacts would be significant.

## Issue 4 Wildlife Corridors and Nursery Sites

*Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Migratory wildlife corridors in the project areas are concentrated in areas designated as Open Space and are located within the MHPA. Development potential in these areas would be limited to passive recreation and trails in conformance with the MSCP SAP. Development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to be focused within developed urban areas that have been previously disturbed and have existing commercial, industrial, residential, or employment uses. References to proposed trails in the University CPU area in Figure 3-26 have been removed. The University CPU identifies potential new trails in the Open Space area next to Marcy Neighborhood Park; however, implementation of these trails is not proposed at this time.

For future site-specific development projects consistent with the project, any potential impacts to wildlife corridors would be determined during project-level environmental review and addressed through compliance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP ~~ESL Regulations, Biology Guidelines, VPHCP, and MSCP SAP~~. Further, the policies within the Blueprint SD Initiative, Hillcrest FPA, and University CPU support protection for canyons that provide wildlife function within urban communities. Policy CE-B.1 from the Blueprint SD Initiative requires the protection and conservation of landforms, canyon lands, and open spaces that serve as core biological areas and wildlife linkages. Policy CE-2.6 in the Hillcrest FPA requires habitat restoration efforts to aid wildlife movement by providing vegetative cover and controlling and directing access to designated trails. Policy 2.7.C in the University CPU requires clustering development in portions of the slope that have already been disturbed or that are sparsely vegetated, in order to preserve sensitive plant and wildlife habitat, biological resources, and contiguous open space. In addition, Policy 5.6.E in the University CPU requires preservation of identified wildlife corridors between canyons by requiring conformance with the MSCP guidelines such as buffers, landscaping, and barriers. Future site-specific development adjacent to urban canyons and other wildlife corridor areas would be required to implement the MHPA Land Use Adjacency Guidelines to ensure there would be no adverse direct and/or indirect impacts to MHPA lands that could provide function for wildlife movement. Therefore, based on the location of potential future development areas, implementation of the project would result in less than significant impacts on wildlife movement or wildlife corridors.

## Issue 5 Conservation Planning

*Would the project conflict with the provisions of the MSCP, VPHCP, or another ~~an~~ adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, such as introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects or introduce invasive species of plants into a natural open space area?*

### a. Multiple Species Conservation Subarea Plan

Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would not affect implementation of the MSCP at a program level of review as these are planning actions with no specific development proposed. Development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to be focused within developed urban areas that have been previously disturbed and have existing commercial, industrial, residential, or employment uses. Therefore, it would be consistent with the MSCP SAP by focusing development in urban areas and outside of the MHPA. The project also includes policies that support the preservation and conservation of Open Space. Although the project would facilitate development in the urban areas throughout the City, it is possible that future development could be located within or adjacent to the MHPA.

Under the Blueprint SD Initiative, future CPUs, specific plans, and FPAs may be approved that are consistent with the General Plan policy framework and the Village Climate Goal Propensity map. Like previous CPUs adopted by the City, future CPUs and/or plan updates may include comprehensive MSCP Boundary Line Corrections (BLCs) to remove land with no biological value (e.g., ~~disturbed or~~ developed lands) from the MHPA and/or BLCs on City-owned land and BLAs to add land with biological value to the MHPA. Future comprehensive BLCs would only be pursued to remove existing ~~disturbed developed~~ land from the MHPA and BLC/BLAs would be proposed to add land to the MHPA, thereby ~~increasing~~ maintaining value and function to the MHPA. No BLCs or BLAs are proposed as part of the Hillcrest FPA. Within the University CPU area, MHPA BLCs are proposed to add City-owned lands into the MHPA, which would increase overall conservation. There is no MHPA BLC deletion being proposed for the University CPU area. The Blueprint SD Initiative, Hillcrest FPA, and University CPU do not propose policies that would conflict with the MSCP.

The MSCP establishes adjacency guidelines to be addressed on a project-by-project basis to minimize direct and indirect impacts and maintain the function of the MHPA. The MHPA Land Use Adjacency Guidelines would be incorporated as project conditions of approval, which would preclude indirect impacts to the MHPA. Future site-specific developments ~~are~~ would be required to demonstrate compliance with the City's MSCP thereby ensuring potential impacts associated with conflicts with the MSCP would be less than significant.

### b. Vernal Pool Habitat Conservation Plan

The Blueprint SD Initiative and the University CPU include policy updates to reflect adoption of the City's VPHCP in 2018. Under the Blueprint SD Initiative, future CPUs, specific plans, and FPAs may be approved that are consistent with the General Plan policy framework and the Village Climate Goal Propensity map. These CPUs, specific plans, and FPAs would be updated to be consistent with the VPHCP and would carry forward key policies to support its implementation.



Development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to be focused within developed urban areas that have been previously disturbed and have existing commercial, industrial, residential, or employment uses. Development within urban areas would be consistent with the VPHCP by focusing development outside of the MHPA. As ~~shown~~discussed in Table 4.3--1, vernal pool resources are known to be present within the University CPU area. There are no known vernal pool resources within the Climate Smart Village Areas or the Hillcrest FPA area. Although the project would focus development in the urban areas throughout the City, it is possible that future project areas could contain vernal pool resources. In the event that any vernal pool resources are identified on or adjacent to a site considered for development, ~~the~~ requirements of the City's VPHCP would apply. The VPHCP Avoidance and Minimization measures detailed in Section 5.2.1 of the VPHCP in addition to MHPA Land Use Adjacency requirements would apply to development adjacent to vernal pool resources to avoid indirect impacts. Any impacts to vernal pools would be evaluated for consistency with the VPHCP general conditions for compensatory mitigation as detailed in Section 5.3 of the VPHCP. With required compliance with the City's VPHCP and MSCP, impacts related to consistency with the VPHCP would be less than significant.

## Cumulative Impacts

Preservation of the region's biological resources is addressed through the implementation of regional habitat conservation plans. Impacts to biological resources in the City are managed through the adopted MSCP SAP and VPHCP, which is incorporated by reference in the City's General Plan and through the City's ~~ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~Biology Guidelines and ~~ESL regulations~~. Projects in the City are required to analyze biological impacts based on the City's adopted CEQA Thresholds. Specifically, cumulative impacts are determined using the following threshold:

The MSCP was designed to compensate for the regional loss of biological resources throughout the region. Projects that conform with the MSCP as specified by the Subarea Plan, and implementing ordinances, (i.e. Biology Guidelines and ESL Regulations) are not expected to result in a significant cumulative impact for those biological resources adequately covered by the MSCP. These resources include the vegetation communities identified as Tier I through IV (see Biology Guidelines, and the MSCP covered species list (see Appendix A of the City of San Diego's MSCP Subarea Plan).

As discussed above, the project areas support a number of sensitive resources including riparian and wetlands, grasslands, vernal pools, meadows, other herb communities, and scrub and chaparral. While sensitive resources are protected through the City's open space designations and/or their location within MHPA lands, development of the project areas could result in a cumulative impact to lands outside protective zones. The City's ESL Regulations would ensure that ministerial projects proposed under the project that would impact ESL are required to process a Site Development Permit, which would require a discretionary review to ensure sensitive resources are evaluated and mitigation is applied to the extent feasible. While the discretionary review process would generally ensure impacts would be mitigated to less than significant, it cannot be ensured at this program level of review whether all impacts could be fully mitigated. Should ESL impacts be identified during the ministerial review, the project would be processed under a discretionary permit to ensure consistency with the City's ~~ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~ESL

~~Regulations, the Biology Guidelines, and the provisions of the MSCP SAP and VPHCP~~ to protect the on-site sensitive resources. Through this process, it is anticipated that a cumulative loss of resources would be avoided; however, at a program level of review it cannot be ensured that all cumulative biological resource impacts would be minimized to a less than significant level. Therefore, cumulative impacts related to sensitive species, sensitive habitats, and wetlands would be significant. Implementation of the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP would avoid cumulative impacts related to wildlife corridors and conservation planning.

## 4.3.5 Significance of Impacts

### 4.3.5.1 Sensitive Species

Future development projects consistent with the Blueprint SD Initiative-, the Hillcrest FPA, and the University CPU may have the potential to impact sensitive plant and wildlife species either directly through the loss of habitat (including critical habitat) and/or direct take, or indirectly by placing development in or adjacent to sensitive habitat. Potential impacts to federal- or state listed species, MSCP Covered Species, Narrow Endemic Species, plant species with a CNPS Rare Plant Rank of 1 or 2, and wildlife species included on the CDFW's Special Animals List would be significant. Potential impacts to birds covered by the Migratory Bird Treaty Act would be avoided by adherence to the requirements of this law. However, at a program level of review it cannot be ensured that all impacts could be feasibly reduced to less than significant; therefore, impacts to sensitive species would be ~~considered~~ significant.

### 4.3.5.2 Sensitive Habitats

Future development projects consistent with the Blueprint SD Initiative, the Hillcrest FPA-, and the University CPU could potentially have an impact on sensitive upland (Tier I, Tier II, Tier IIIA, and Tier IIIB) habitat that is present within the project areas. Development per the Blueprint SD Initiative, Hillcrest FPA, and University CPU is anticipated to be focused within developed urban areas that have been previously disturbed and have existing commercial, industrial, residential, or employment uses; however, some project areas could support sensitive habitats. All future development including ministerial and discretionary projects would be reviewed for consistency with the City's ESL regulations and if any ESL is present, a discretionary Site Development Permit or Neighborhood Development Permit would be required including an environmental review process that requires analysis demonstrating compliance with the City's ESL Regulations, Biology Guidelines, MSCP SAP and VPHCP. Sensitive habitat in the project areas is concentrated in the MHPA, which are conservation lands with limited potential for disturbance as regulated by the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~ESL regulations, Biology Guidelines, MSCP SAP and VPHCP.~~ However, development may occur within the MHPA subject to a Boundary Line Adjustment or BLC. Additionally, development may occur within non-MHPA sensitive habitats. At a program level of review, impacts to sensitive habitats would be ~~considered~~ significant.

### 4.3.5.3 Wetlands

Future development projects consistent with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU could potentially have an impact on wetlands or other jurisdictional wetland areas that are present within the project areas. Wetlands impacts are regulated by the City in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~ESL Regulations, VPHCP, and MSCP SAP~~. Additionally, impacts to jurisdictional features would be subject to regulation by the U.S. Army Corps of Engineers in accordance with Section 404 of the CWA, the RWQCB in accordance with Section 401 of the CWA, and the CDFW under Section 1600 of the California Fish and Game Code, as applicable. Although wetlands in the project areas are concentrated in the MHPA, including canyons, and creeks, since site-specific future development is unknown at this time, there is a potential that wetlands could be affected. Implementation of the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~ would ensure impact to wetlands would be avoided to the extent feasible and a wetland buffer provided around all wetlands as appropriate to protect the functions and values of the wetland (City of San Diego 2018). Implementation of the existing regulatory framework would reduce potential impacts to wetlands during project level reviews. However, at a program level of review without site-specific plans available for review, it cannot be ensured that all impacts to wetlands would be mitigated to a less than significant level. Thus, impacts to wetlands would be ~~considered~~ significant.

### 4.3.5.4 Wildlife Corridors and Nursery Sites

Regional and local wildlife corridors are not located within the project areas due to their location within open space and MHPA lands. No Open Space land use designation would ~~not~~ be changed by the proposed plans. Future development projects consistent with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would undergo environmental review to determine potential impacts on wildlife corridors, and impacts would be mitigated in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~ESL Regulations, Biology Guidelines, MSCP SAP and VPHCP~~. Due to the anticipated location of development being concentrated in already developed or urban areas combined with the City's regulatory framework that protects conservation areas and sensitive habitats, the project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP SAP, nor would the project impede the use of native wildlife nursery sites. Impacts would therefore be less than significant.

### 4.3.5.5 Conservation Planning

Future development projects consistent with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be subject to compliance with applicable current and future local, state, and federal policies, guidelines, directives, and regulations, including but not limited to, the state and federal ESA, the San Diego County MSCP, the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~ESL Regulations, Biology Guidelines, and the City's MSCP and VPHCP~~. Analysis related to consistency with conservation plans is included in Section 4.10.4. Revisions to the General Plan Conservation Element, Hillcrest FPA, and the University CPU, incorporate updated policies to

support implementation of the City's MSCP SAP and VPHCP and include policies aimed at resource protection and preservation of the MHPA and open space. Future development within the project areas would be evaluated for compliance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~MSCP SAP, VPHCP, Biology Guidelines, ESL Regulations~~, in addition to applicable policies. Project-specific requirements and necessary avoidance and mitigation measures would be determined at the project level. Adherence to the City regulatory framework would avoid future significant impacts. Therefore, the project would not result in a conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP SAP area or in the surrounding region. Impacts would therefore be less than significant.

### 4.3.6 Mitigation, Monitoring and Reporting

Mitigation measures are provided at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific projects are proposed. The mitigation measures refer to City regulations (i.e ESL Regulations and Biology Guidelines) and plans that have incorporated detailed performance standards and are fully enforceable through permit conditions or other legally binding instruments, consistent with CEQA Guidelines Section 15126.4(a)(2). The referenced plans, policies, or regulations in the mitigation measures described in this section The following mitigation framework provides a program-level framework for reducing significant impacts related to biological resources. MM-BIO-1 would be implemented to minimize and avoid impacts related to sensitive species, sensitive habitats, and wetlands to the extent feasible.

#### MM-BIO-1 – Impacts to Sensitive Biological Resources

Future projects that could directly and/or indirectly impact sensitive species, sensitive habitats and/or wetlands shall comply with the City's Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans including, but not limited to, the City's Multiple Species Conservation Program (MSCP) Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP) and shall implement avoidance, minimization, and mitigation measures in accordance with the City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~ESL Regulations, Biology Guidelines, and MSCP Subarea Plan and VPHCP~~.

### 4.3.7 Significance after Mitigation

Implementation of MM-BIO-1 in addition to existing state and federal regulations would ensure that potential impacts to sensitive species, sensitive habitats and/or wetlands resulting from future development anticipated under the project would be avoided, minimized and mitigated to the extent feasible, consistent with all applicable federal, state, and City regulations and conservation plans. Potential impacts to sensitive species and/or designated critical habitat of listed species would be mitigated in accordance with City's ESL Regulations, Biology Guidelines, MSCP SAP, and VPHCP~~ESL Regulations, Biology Guidelines, and the provisions of the MSCP SAP and VPHCP~~.

While implementation of the City's regulatory framework typically is sufficient to ensure impacts are reduced to less than significant; however, at a program level of review and without project-specific

details, it cannot be known with certainty that it would be feasible to mitigate all significant impacts. future project-specific impacts to less than significant due to the potential for deviations from the City's ESL Regulations to be approved that may allow for limited instances of impacts to occur that are not fully mitigated. For example, a wetland deviation outside of the coastal zone under the Economic Viability Option [SDMC Section 143.0510(d)(d)(1)] could be allowed if the strict application of the regulations would otherwise deprive a property of economically viable use. This would also require findings under SDMC Section 126.054(c) that there are no feasible measures that can further minimize the potential adverse effects on environmentally sensitive lands and the proposed deviation is the minimum necessary to afford relief from special circumstance or conditions applicable to the land and not of the applicant's making. Therefore, after implementation of MM-BIO-1, impacts would remain significant.

## 4.4 Cultural Resources

This section analyzes the potential for significant impacts as it relates to cultural resources. Cultural resources include historical, archaeological, and Tribal Cultural Resources. This section focuses the analysis on potential impacts to historical and archaeological resources that could result from implementation of the following key project components:

- “Blueprint SD Initiative,” which includes adoption of a General Plan amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (LCPU) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC ~~Land Development Code~~, and associated discretionary actions.

This section documents the historical background for the project areas and addresses prehistoric and historic archaeological resources, the built environment, and cultural resources. The analysis of impacts in this section is based in part on the following reports:

- Blueprint SD Initiative Cultural Resources Analysis prepared by Helix Environmental Planning (Appendix G)
- Cultural Resources Constraints and Sensitivity Analysis for the University Community Plan Update prepared by Red Tail Environmental (Appendix H-1)
- Draft Hillcrest Focused Plan Amendment LGBTQ+ Historic Context Statement July 2021 (Appendix H-2)
- Historic Context Statement and Reconnaissance Survey for the University Community Plan Update (Appendix B)
- University Community Plan Focused Reconnaissance Survey prepared by Dudek (Appendix C)

Potential impacts to Tribal Cultural Resources are discussed in Section 4.15, Tribal Cultural Resources, of this Program Environmental Impact Report (PEIR).

## 4.4.1 Existing Conditions

### 4.4.1.1 Historical and Archaeological Resources

Historical resources are physical features, both natural and constructed, that reflect past human existence and are of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance. These resources may include such physical objects and features as archaeological sites and artifacts, buildings, groups of buildings, structures, districts, street furniture, signs, cultural properties, and landscapes. Historical resources in the San Diego region span a timeframe of at least the last 10,000 years and include both the prehistoric and historic periods. For purposes of the PEIR, historical resources consist of historic buildings, structures, objects, or sites, prehistoric and historic archaeological resources and human remains, and cultural resources determined to be significant under the California Environmental Quality Act (CEQA).

Archaeological resources include prehistoric and historic locations or sites where human actions have resulted in detectable changes to the area. This can include changes in the soil, as well as the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both. Prehistoric resources may include midden deposits, lithic and/or ceramic scatters, milling features, or inhumations. Historic archaeological resources are those originating after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures.

#### a. Blueprint SD Initiative

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative Climate Smart Village Areas. Although the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide, it is anticipated that potential impacts associated with implementation of the Blueprint SD initiative are most likely to be concentrated within the Climate Smart Village Areas. As detailed in the Blueprint SD Initiative Cultural Resources Analysis (see Appendix G), a total of 7,139 recorded cultural resources were identified on file at the South Coast Information Center (SCIC) as being within the City. Of the 7,139 resources within the City, a total of 2,695 recorded resources are located within the Climate Smart Village Areas. These resources include 106 prehistoric resources and 2,564 historic resources, 22 multi-component resources, and 3 unknown resources.

The 128 prehistoric resources (106 prehistoric and 22 multi-component) consist of 60 artifact scatters, 38 isolates, and 22 occupation sites (Table 4.4-1). One recorded prehistoric resource did not include any information. Other prehistoric resource types within the Climate Smart Village Areas consist of burial sites, middens, bedrock milling features with and without associated artifacts, a hearth, and a rock feature.



Resource Classification	Count	Percent
Artifact Scatter	60	48.87%
Isolated Artifacts	38	29.69%
Occupation Sites	22	17.19%
Midden Sites	3	2.34%
Bedrock Milling Feature	1	0.78%
Bedrock Milling Feature with Artifacts	1	0.78%
Hearths	1	0.78%
Rock Features and Art	1	0.78%
No Information Given	1	0.78%
<b>Total</b>	<b>128*</b>	<b>100%</b>
SOURCE: Appendix G		
*Includes Multi-Component Resources		

The 2,586 recorded historic resources (2,564 recordations) and historic components of multi-component resources (22 recordations) include 1,876 historic buildings, 297 refuse deposits and artifact scatters, 129 isolated artifacts, and 144 sidewalk stamps as detailed in Table 4.4-2. The Climate Smart Village Areas included a large number (37 recordations) of structural remains with and without artifacts. Glass and metal artifacts were the most numerous isolates type, though other isolate types recorded within the Climate Smart Village Areas included bricks and historic ceramics.

Resource Classification	Count	Percent
Building	1,876	72.54%
Refuse Deposit and Dumpsite	196	7.58%
Sidewalk Stamps	144	5.57%
Isolated Artifacts	129	4.99%
Artifact Scatter	101	3.90%
Structural Remains with Artifacts	21	0.81%
Cistern and Refuse	17	0.66%
Structural Remains	16	0.62%
Bridge	13	0.50%
Dams, Water Conveyance Features, and Wells	11	0.42%
District and Elements	11	0.42%
Railroad	11	0.42%
Structures	7	0.27%
Wall	6	0.23%
Military Property and Sites	4	0.15%
Road/Trail	3	0.12%
Rock Feature	3	0.12%
Park	3	0.12%
Mural/Graffiti	3	0.12%

Table 4.4-2 Recorded Historic Resources within the Climate Smart Village Areas		
Resource Classification	Count	Percent
Homestead/Ranch	1	0.04%
Monument/Marker/Sign	1	0.04%
Orchard/Grove	1	0.04%
Cemetery and Burials	1	0.04%
Post	1	0.04%
Utility Poles	1	0.04%
Privy	1	0.04%
Mission	1	0.04%
No Information Given	3	0.12%
<b>Total</b>	<b>2,586*</b>	<b>100%</b>
SOURCE: Appendix G		
*Includes Multi-Component Resources.		

## b. University Community Plan Update

As detailed in the Cultural Resources Constraints and Sensitivity Analysis for the University CPU (see Appendix H-1), a total of 248 resources were documented within the University CPU area. The University CPU area resources are comprised of 184 prehistoric resources, 46 historic resources, 16 multi-component resources, and 2 resources that contain no information. Of the prehistoric resources and prehistoric components of multi-component resources, 99 resources are artifact scatters, 56 are isolated artifacts, and 22 are occupation sites. Middens, hearths, and quarries are also recorded within the area as detailed in Table 4.4-3. The most common isolates recorded are lithic artifacts. A total of 62 historic resources and historic components of multi-component sites and isolates are recorded within the University CPU area. These include 19 artifact scatters and refuse deposits, 12 isolated artifacts, and 8 buildings as detailed in Table 4.4-4. Other less common resources within the area include structural remains, water conveyance features, and military properties or sites. Glass artifacts and historic cans are the most common artifact type.

Table 4.4-3 Recorded Prehistoric Resources within the University CPU Area		
Resource Classification	Count	Percent
Artifact Scatter	99	49.01%
Isolated Artifacts	56	27.72%
Occupation Sites	22	10.89%
Midden Sites	11	5.44%
Hearths	8	3.96%
Quarry	5	2.47%
Bedrock Milling Feature with Artifacts	1	0.49%
<b>Total</b>	<b>202*</b>	<b>100%</b>
*Includes Multi-Component Resources.		

Table 4.4-4 Recorded Historic Resources within the University CPU Area		
Resource Classification	Count	Percent
Artifact Scatter	19	30.64%
Isolated Artifacts	12	19.35%
Building	8	12.90%
Bridge	4	6.45%
Structural Remains	3	4.84%
Refuse Deposit and Dumpsite	2	3.22%
Military Property and Sites	2	3.22%
Dams, Water Conveyance Features, and Wells	2	3.22%
Road/Trail	1	1.61%
Structures	1	1.61%
Homestead/Ranch	1	1.61%
Railroad	1	1.61%
Wall	1	1.61%
Monument/Marker/Sign	1	1.61%
Orchard/Grove	1	1.61%
Park	1	1.61%
Post	1	1.61%
Mine	1	1.61%
<b>Total</b>	<b>62*</b>	<b>100%</b>
SOURCE: Appendix H-1		
*Includes Multi-Component Resources.		

### c. Hillcrest Focused Plan Amendment

The Hillcrest FPA area is within the Uptown Community Planning Area. The Uptown Community Plan was comprehensively updated in 2016, and a record search for the Uptown Community Plan Update was performed in 2009. A total of 53 historical resources were identified in the Hillcrest FPA area. These include 36 buildings, 13 sidewalk stamps, 2 refuse deposits, a bridge, and a road as detailed in Table 4.4-5.

Table 4.4-5 Recorded Historic Resources within the Hillcrest FPA Area		
Resource Classification	Count	Percent
Building	36	67.92%
Sidewalk Stamp	13	24.53%
Refuse Deposit	2	3.77%
Bridge	1	1.89%
Road	1	1.89%
<b>Total</b>	<b>53</b>	<b>100%</b>

## **4.4.1.2 Blueprint SD Initiative Cultural Background**

### **a. Blueprint SD Initiative Context (Citywide)**

Evidence for continuous human occupation in the San Diego region spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. This research employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-7,450 Before Present [BP]), Archaic (7,450-1,450 BP), Late Prehistoric (450 BP–AD 1769), and Ethnohistoric (post-AD 1769). It is important to note that Native American aboriginal lifeways did not cease at European contact. Protohistoric refers to the chronological trend of continued Native American aboriginal lifeways at the cusp of the recorded historic period in the Americas.

The pre-contact cultural sequences are locally characterized by the material culture recovered during archaeological investigations as early as the 1920s, and through early accounts of Native American life in San Diego, recorded as a means to salvage Tribal cultural scientific knowledge of native lifeways.

The prehistoric cultural sequence in San Diego County is generally described as comprising three basic periods: the Paleoindian, dated between about 11,500 and 8,500 BP and manifested by the artifacts of the San Dieguito Complex; the Archaic, lasting from about 8,500 to 1,500 BP (AD 500) and manifested by the cobble and core technology of the La Jollan Complex; and the Late Prehistoric, lasting from about 1,500 BP to historic contact (i.e., AD 500 to 1769) and represented by the Cuyamaca Complex. This latest complex is marked by the appearance of ceramics, small arrow points, and cremation burial practices.

### **b. Paleoindian Period**

The Paleoindian Period in San Diego County, which was situated at the terminal Pleistocene through Early Holocene geologic eras (circa 11,700 to 7,500 BP) is most closely associated with the San Dieguito Complex, as identified by Rogers (1938, 1939, 1945). Many archaeological sites attributed to the San Dieguito time frame are described as surface or very shallow deposits, typically located on inland knoll tops and ridge fingers overlooking watercourses. The usually tenuous nature of these deposits, coupled with a limited range of tool types, has led many researchers to interpret San Dieguito sites as either temporary camps or loci of specialized activities, such as hunting or food processing. If these views are correct, then a San Dieguito economy, based primarily on hunting activities and secondarily on the use of plant resources, was probably expressed as a nomadic lifestyle that may have entailed seasonal patterns of movement dictated by the availability of local resources. The San Dieguito assemblage consists of well-made scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped points. The San Dieguito Complex is thought to represent an early emphasis on hunting (Warren et al. 1993: III33).

### **c. Archaic Period**

The Archaic Period in coastal San Diego County is represented by the La Jollan Complex, a local manifestation of the widespread Millingstone Horizon. The La Jollan Complex spans the latter part of the Early Holocene, through the Middle Holocene, to the middle Late Holocene (circa 8,500 to 1,500 BP). This period brings an apparent shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. The local cultural manifestations of the Archaic Period are called the La Jollan Complex along the coast and the Pauma Complex inland. Pauma Complex sites lack the shell that dominates many La Jollan sites. Along with an economic focus on gathering plant resources, the settlement system appears to have been more sedentary. Large deposits of marine shell at coastal sites argue for the importance of shellfish gathering to the coastal Archaic economy (True 1980). Sites dating to the Archaic Period are numerous along the coast, near-coastal valleys, and around estuaries. In the inland areas of San Diego County, sites associated with the Archaic Period are less common relative to the Late Prehistoric complexes that follow them. The La Jolla/Pauma complex tool assemblage is dominated by rough cobble tools, especially choppers and scrapers. The La Jolla/Pauma complex tool assemblage also includes manos and metates; terrestrial and marine mammal remains; flexed burials; doughnut stones; discoidals; stone balls; plummets; biface points; beads; and bone tools.

### **d. Late Prehistoric Period**

While there has been considerable debate about whether San Dieguito and La Jollan patterns might represent the same people using different environments and subsistence techniques, or whether they are separate cultural patterns, abrupt shifts in subsistence and new tool technologies occur at the onset of the Late Prehistoric Period (1,500 BP to AD 1769). This period coincides with the Late Holocene, dating after 3,500 BP. The Late Prehistoric period is represented by the San Luis Rey complex in the northern portion of San Diego County and the Cuyamaca complex in the southern portion of the county. Near the coast and in the Peninsular Mountains beginning approximately 1,500 years ago, patterns began to emerge which suggest the ancestors of the ethnohistoric Kumeyaay occupied the area. This period is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversify and intensify during this period, with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive but effective technological innovations. The late prehistoric archaeology of the San Diego coast and foothills is characterized by the Cuyamaca Complex. It is primarily known from the work of D.L. True (1970) at Cuyamaca Rancho State Park. The Cuyamaca Complex is characterized by the presence of steatite arrowshaft straighteners, steatite pendants, steatite comales (heating stones), Tizon Brown Ware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic "Yuman bow pipes," ceramic rattles, miniature pottery, various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, mortars and pestles, and Desert Side-Notched (more common) and Cottonwood Series projectile points (True 1970).

Based on ethnographic data, including the areas defined for the Hokan-based Yuman-speaking peoples (Kumeyaay) and the Takic-speaking peoples (Luiseño) at the time of contact, it is now generally accepted that the Cuyamaca complex is associated with the Kumeyaay and the San Luis Rey complex with the Luiseño. Agua Hedionda Creek is often described as the division between the

territories of the Luiseño and the Kumeyaay people, although various archaeologists and ethnographers use slightly different boundaries.

### e. Ethnohistoric Period

The Ethnohistoric Period commences with the earliest European arrival in what is now San Diego and continued through the Spanish and Mexican periods and into the American period. Spanish colonists began to settle Alta California with the founding of Mission San Diego de Alcalá in AD 1769, within the territory of the Kumeyaay people. The Kumeyaay (also known as Kamia, *Ipai/Tipai*, and Diegueño) occupied the southern two-thirds of San Diego County. The Kumeyaay lived in semi-sedentary, politically autonomous villages or rancherias. A settlement system typically consisted of two or more seasonal villages with temporary camps radiating away from these central places (Cline 1984). Their economic system consisted of hunting and gathering, with a focus on small game, acorns, grass seeds, and other plant resources. The most basic social and economic unit was the patrilocal extended family. A wide range of tools was made of locally available and imported materials. A simple shoulder-height bow was used for hunting. Numerous other flaked-stone tools were made, including scrapers, choppers, flake-based cutting tools, and biface knives. Preferred stone types were locally available metavolcanics, quartzite, and quartz. Obsidian was imported from the deserts to the north and east. Ground stone objects include mortars and pestles typically made of locally available fine-grained granite. Both portable and bedrock types are known. The Kumeyaay constructed fine baskets. These employed either coiled or twined construction. The Kumeyaay also manufactured pottery, using the paddle-and-anvil technique. Most were a plain brown utility ware defined as Tizon Brown Ware. Decorated Tizon is known but is infrequent (May 1978; Meighan 1954; Spier 1923).

One difficulty with defining the Ethnohistoric Period is that influences from encroaching Spanish colonial forces undoubtedly reached northern groups, far in advance of the founding of Mission San Diego de Alcalá and Presidio de San Diego in AD 1769. For the local area the pace of cultural change accelerated after that date, and ultimately, the coming of the Spanish precipitated largescale native depopulation, relocation, and social collapse of the aboriginal groups. This era also resulted in terminological confusion because Fray Junípero Junípero Serra, following standard practice, called the San Diego mission neophytes “Diegueños” and the Mission San Luis Rey de Francia neophytes “Luiseños.” These terms were extended to incorporate all natives within the holdings of each combined mission and Presidio administrative district, generally in complete ignorance of traditional sociopolitical divisions.

It is difficult to accurately reconstruct aboriginal social and political structures because the Spanish recorded little information of value in this regard, and ethnographic field research began long after native cultures had experienced significant historical impacts. The Yuman speaking inhabitants throughout most of San Diego County were loosely organized into at least two dialectically separate groups, each associated with a geographic area that was home to many triplets or bands. The *Ipai* (northern) and *Tipai* (southern) divisions were not so much clearly defined territorial units as they were emicly recognized, cultural and dialectical structures (Luomala 1978:592). In original usage, these terms probably had geographic and/or classificatory meanings that have since been lost or modified.

The Kumeyaay traditionally maintained a system of patrilineal, patrilocal, exogamous sibs that were distributed within a territorially associated band structure (Luomala 1978:602; Shipek 1982:297; Gifford 1973:378). Each band contained members of up to 15 sibs within its organization (Shipek 1982:297). The consanguineal kin group (household) was the primary social structure and consisted of a married couple together with their unmarried children, married sons and families, and such dependent relatives within the father's lineage as his parents, grandparents, and unmarried aunts or uncles (May 1975:3). At any one time, the Kumeyaay band usually maintained a main village and several outlying villages (True 1970:55; May 1975:4; Shipek 1982:297; Luomala 1978:597). Since the economy was based on intensive utilization of locally available natural resources, these settlements were more or less temporary. Residential units often split into their constituent clans when movement to other areas was necessitated either by seasonal changes or by local overexploitation. A "permanent" village, as recorded by early European explorers, probably consisted of an area that was regularly utilized by local band members for a large part of the yearly cycle (Luomala 1978:597). At the time of Spanish intrusion, institutionalized leadership roles within the clans and various integrating systems between the clans facilitated flexible patterns of personnel movement and trade throughout the region (Shipek 1982:302). There were also various connections with the bands and clans of other ethnolinguistic traditions.

European contact substantially and pervasively stressed the social, political, and economic fabric of Kumeyaay culture. Missionary influence eroded traditional religious and ideological institutions, while Spanish development of coastal areas for crops and livestock severely impacted traditional subsistence practices. Disease, starvation, and a general institutional collapse caused emigration, birth rate declines, and high adult and infant mortality levels. For a short time and principally among inland groups, these pressures enhanced the role and increased the scope of interclan and possibly Tribal level political institutions. However, continuing European encroachments eventually made traditional band\_level lifeways progressively unviable. A few impoverished bands were able to retain traditional patterns in remote mountain areas until the early twentieth century, but the broader and complex Kumeyaay social system was effectively dismantled by the mid-nineteenth century. The general collapse was so rapid and complete that most village locations and band, clan, or lineage names were never recorded.

The lack of Spanish colonial records notwithstanding, through a combination of ethnographic research, oral tradition, and archaeological investigations it is now understood that at the time of Spanish colonization in the late 1700s, several major villages, or rancherías, were located throughout coastal and riverine San Diego. Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego River provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. At least three village localities are known along the San Diego River, including *Nipaguay* at the location of the San Diego Mission de Alcalá, on the north side of the river, *Kosaii*, located at Old Town, on the south side of the river, and the likely named Paulpa village at the mouth of the San Diego River in Ocean Beach. Other villages include *Milejo* and *Chiap* in the mouth of the Tijuana and Otay River Valleys, *Los Choyas*, along Chollas Creek, *Rinconada (Jamo)* along Rose Creek, and *Ystagua*, along Soledad Creek. The presence of significant sites along river courses and valley bottoms point to the importance of these physiographic features to native populations. Some native speakers referred to river valleys as *oon-ya*, meaning trail or road, describing one of the main routes linking the interior of San Diego with the coast.

### 4.4.1.3 Blueprint SD Initiative Historical Background

There are three general eras in California history: the Spanish, Mexican, and American periods. The historical background that follows is from the Blueprint SD Initiative Cultural Resources Analysis (see Appendix G).

#### a. Spanish Period

The Spanish period represents a time of European exploration and settlement. Dual military and religious contingents established the San Diego Presidio and the Mission San Diego de Alcalá. The mission system used Native American labor to build the infrastructure needed for European settlement. Traditional lifeways were disrupted, and Native American populations became tied economically to the missions. In addition to providing new construction methods and architectural styles, the mission system introduced horses, cattle, and other agricultural goods and implements to the area. The cultural systems and institutions established by the Spanish continued to influence the region beyond 1821, when California came under the rule of newly independent Mexico.

As part of the Spanish efforts to establish itself in New Spain, Spanish explorers advanced along the coast of Baja and Alta California, and the interior regions of the North American Southwest during the middle 1500s. Despite these early explorations Spanish colonization of Alta California did not begin in earnest until 1769, initiating the traditionally defined Spanish Period (1769-1821) in the region. After establishing several missions in mainland Mexico, and as the recently appointed president of the missions of Baja California after the expulsion of the founding Jesuit missionaries, Franciscan Friar Father Junípero Serra, was further tasked with establishing missions in Alta California. Serra was attached as the religious retinue to the military expedition under the command of Gaspar de Portolá. While the naval contingent of Portolá's expedition sailed on from Loreto, Baja California Sur, Portolá, Serra, and a ground party traveled overland, visiting and establishing missions on their way to San Diego, with the goal of reaching Monterey, Alta California. An advanced party, led by Fernando Javier Rivera y Moncada pressed on ahead of the Portolá/Serra group, reached San Diego in May of 1769, established a base camp in an area between present-day Old Town and downtown San Diego. Shortly thereafter, the settlement was moved closer to the San Diego River, near the Kumeyaay village of *Kosti/Cosoy/Kosaii/Kosa'aay*, below present-day Presidio Park. After the arrival of Portolá and Serra, and the resupply ships sent earlier, Serra established Mission San Diego de Alcalá on July 16, 1769, on the rising hill above the lower floodplain. After the dedication the site was garrisoned and the Royal Presidio was established. By 1774, the Mission San Diego de Alcalá was moved up the river valley to its current location in Mission Valley, while the presidio remained on Presidio Hill. The Spanish presence was not always welcomed, and attacks and revolts, though infrequent, did occur, due in no small part to the treatment of the local population by military personnel. This was, in part, the impetus for the mission relocation, but even this effort to separate the religious establishment from the military fortification did not diminish the desire to expel the Spanish colonists, and by late 1775 several rancherias organized a revolt, sacking Mission San Diego de Alcalá, and killing Father Luis Jayme, as well as Jose Arroyo, the mission's blacksmith, and Urselino, the mission's carpenter. Nevertheless, the quest to convert local Kumeyaay bands to Christianity remained unabated while resistance to Spanish missionization persisted, albeit at a lesser intensity (Carrico 1997).



## **b. Mexican Period**

The Spanish colonial success in the distant reaches of New Spain was never very secure. There was continual difficulty in inducing military personnel to relocate to the poorly supported far off presidios, and the missions themselves found it difficult to support themselves, let alone burdened with feeding and housing military support. Thus, following the invasion of Spain in the first decade of the 1800s a political vacuum and instability was established, not only in Spain, but in its possessions as well. By late 1821, after a decade of fits and starts, Colonel Agustín de Iturbide proclaimed the independence of the Mexican Empire, later the Mexican Republic. The Mexican period (1821-1848) in Alta California retained many of the Spanish institutions and laws. Mexico, still in turmoil with its independence from Spain, quickly moved to secularize the missions, with a "Proclamation of Emancipation" on July 25, 1826, as a check on potential Spanish influence within the Catholic dominated religious institution. By 1834 the mission system was officially secularized, allowing for increased Mexican settlement and the associated dispossession of many local Native Americans, expanding the rancho system that had begun, but was infrequently used, during Spanish rule. The Mexican government also opened California to foreign merchant ships, exchanging California cattle hides for the manufactured goods of Europe and the eastern United States. Several of these American trading companies erected rough sawn wood-plank sheds at Point Loma's La Playa, near Fort Guijarros, or Ballast Point. The merchants used these "hide-houses" for storing the hides before transport to the East Coast (Smythe 1908). As the hide trade grew, so did the need for more grazing lands. The Mexican government granted 29 ranchos in San Diego County to loyal soldiers, politicians, and powerful landowning families (San Diego State University 2011). The land was used primarily for grazing cattle (Pourade 1963). Cattle ranching dominated agricultural activities and the hide and tallow trade flourished in California during the early part of this period.

This redistribution of land also resulted in the creation of a civilian pueblo in San Diego. In 1834, a group of San Diego residents living near present-day Old Town successfully petitioned the governor to formally declare their settlement as a pueblo. San Diego was granted official pueblo status, which came with the right to self-government and exemption from military rule (Crane 1991). In addition to the creation of a new town government, "A major consequence of San Diego's being given pueblo status was the eventual acquisition of vast communal lands. In May 1846 Governor Pío Pico confirmed San Diego's ownership of 48,000 acres including water rights. It was the largest such concession ever given to a Mexican town in California. The grant, a heritage of the Mexican government, was a rich resource that subsidized much of San Diego's municipal development well into the twentieth century" (San Diego State University 2011). The Pueblo Lands of San Diego were divided into 1,350 parcels, ranging in size from 10-acre lots near Old Town to 160-acre sections further from town. A large "City Reservation" was set aside for parkland as part of the Pueblo Lands, and still serves the City in that capacity today as Balboa Park (San Diego County Assessor n.d.). The Mexican period ended when Mexico ceded California to the United States after the Mexican-American War (1846-1848).

## **c. American Period**

With the removal of Mexico City-appointed Governor Manuel Micheltoarena by Californios disenchanted with the lack of consideration and support from Mexico City, a power vacuum ensued with the breakaway province. Already eager to divest Mexico of its territory, as had happened in

1845 with the annexation of Texas, American political forces began exploring their options. Secretly President Polk, through Secretary of State James Buchanan, conspired with Thomas Larkin, a naturalized Mexican citizen, to quietly encourage the breakaway territory to assert its independence from Mexico, whereby the United States “shall render her all the kind offices in our power as a Sister Republic” (Rawls and Bean 1998). Ultimately, however, it was consequences of the annexation of Texas that would determine the fate of the territory that would become California. Disagreements as to the southern border of Texas resulted in the declaration of war with Mexico on May 13, 1846.

American governance began in 1848, when Mexico signed the Treaty of Guadalupe Hidalgo, ceding California to the United States at the conclusion of the Mexican–American War. A great influx of settlers to California and the San Diego region occurred during the American Period, resulting from several factors, including the discovery of gold in California, the end of the Civil War, the availability of free land through passage of the Homestead Act, and later, the richness of San Diego County as an agricultural area supported by roads, irrigation systems, and connecting railways. The increase in American and European populations quickly overwhelmed many of the Spanish and Mexican cultural traditions, and greatly increased the rate of population decline among Native American communities.

Early in the American period, gold was again “discovered” in California—previously, Spanish explorers noted gold in the Cargo Muchacho Mountains near Yuma crossing, and in 1842 gold was found by Francisco Lopez after an afternoon siesta in the San Gabriel Mountain foothills of Santa Clarita. The resulting influx of people from all over the world resulted in systematic effects across the new state. Settlers, squatters, hunters, loggers, and land grabbers systematically disentangled the state from its lands. Nearly every Spanish and Mexican land grant experienced a series of land squabbles, squatting, and litigious conflicts. While the Board of Land Commissioners, the Appellate Court, or the United States Supreme Court settled many of these disputes, litigation costs often forced the legitimate landowners to sell their property to pay for the costs of defending their lawful claim. Few Mexican-owned ranchos remained intact because of land claim disputes and the onerous system set up for proving ownership to the State and U.S. Governments.

As early as 1850 real estate speculators began subdividing and platting the flatlands just a few miles south of Old Town. Andrew B. Gray convinced San Francisco merchant William Heath Davis and several prominent San Diegans, José Antonio Aguirre, Miguel de Pedrorena, and William C. Ferrell, to help finance the purchase and development of the subdivision they called New Town. The new townsite’s development was such that the developers were able to entice the U.S. Army to construct a new depot at the location. After Davis fulfilled his obligation to construct a 600-foot deep-water wharf all that remained was to convince the railroads to site San Diego as the Southern Terminus. However, significant financial losses incurred by Davis due to a fire at his San Francisco warehouse, the loss of military commitment to the new depot, and the advent of the Civil War stalling efforts to establish a southern railroad ended the affair.

Following the end of the Civil War, development of the railroads opened up much of the country. The homestead system encouraged American settlement in the western territories. Throughout the west, the growth and decline of communities occurred in response to an increasing and shifting population, fostering a “boom and bust” cycle. As early as 1868, San Diego was promoted as a natural sanitarium, and many people suffering from tuberculosis came to the area seeking a cure in

the moderate climate. In the late 1860s, Alonzo Horton began the development of New San Diego and initiated the shift of commerce and government centers from Old Town (Old San Diego) to New Town (downtown). Based on earlier development experience, Horton understood the desirability of corner lots, and the cash premium they commanded, and as a result the new City was laid out in a series of small blocks arrayed in a compact grid system, maximizing the number of possible corner lots available (MacPhail 1979). Such was the next promise of a rail connection to the eastern United States, and the apparent demand for real estate within Horton's Addition that during the five years following the establishment of Horton's 1867 townsite, speculators laid out over 15 new subdivisions around Horton's tract, most of which emulated Horton's compact block-grid theme. These areas were located within the present neighborhoods of Hillcrest, Sherman Heights, Golden Hill, Logan Heights, North Park, Mission Hills, and University Heights, as well as 1,440 acres set aside for a City park (Harlow 1987:137-174; Smythe 1908:616-621; Montes 1977). The completion of Horton's wharf at the foot of 5<sup>th</sup> Avenue in fall 1868 focused the business development of the new metropolis along 5<sup>th</sup> and 6<sup>th</sup> Avenue south of Ash to the docks.

By the end of the 1880s, after a series of boom and bust cycles, with the population ebbing and flowing, many of the newcomers had left. A core population remained, however, and went on to form the foundations of small communities seen throughout the immediate area, founded on dry farming, orchards, dairies, and livestock ranching. During the late nineteenth and early twentieth centuries, rural areas of San Diego County developed small agricultural communities centered on one-room schoolhouses.

By the 1890s, the City entered a time of steady growth, and subdivisions surrounding downtown were developed. This was facilitated through the development of a series of commuter rail systems that eventually came to be called the San Diego Electric Railway. Several railway systems were formed in the late 1880s, including the San Diego Street Car Company, which operated across the core streets of the City via horse and mule power, the City and University Heights Railroad serving the developments north of Downtown using steam dummies, and the Ocean Beach Railroad, originally conceived as connecting Downtown to Ocean Beach via Old Town, but actually only linking Roseville (Point Loma) with Ocean Beach, also using a steam dummy. Other developers similarly designed streetcar access to and within areas such as Coronado, National City, Pacific Beach, and La Jolla using a variety of technologies. The failure to realize a direct southern rail terminus in San Diego County closed the late 1880s in an economic bust that was to see the consolidation of several of these systems into the San Diego Electric Railway. The funds, and the planning, brought to the system by John D. Spreckels, Adolph B. Spreckels, Elisa S. Babcock, C. T. Hinde, and J. A. Flint resulted in the expansion of the network across the City and into adjacent outlying areas, priming them for development (Dodge 1960). As the City continued to grow in the early twentieth century, the downtown's residential character changed. Streetcars and the introduction of the automobile allowed people to live farther from their downtown jobs, and new suburbs were developed.

As a result of industrial influences selecting Los Angeles as the terminus of the southern railroad, relegating San Diego to a branch service, the influence that the American military, in particular the U.S. Navy, has had on the development of San Diego during the twentieth century cannot be overstated. As early as 1908, the City had been advocating for an increase in the connection with the military, succeeding in persuading the Navy to send the Atlantic fleet—known as the Great White Fleet—to visit San Diego during its historic circumnavigation of the globe. By late 1919, the U.S. Navy

decided to station a fleet in San Diego, due in large part to the efforts of William Kettner, but also as a military check on increasing colonial pressures in the western Pacific. Realizing the benefits of the port the Navy encouraged San Diego to deepen and broaden the narrow channel into the bay, thereby allowing larger ships to port in the harbor. The creation of Naval Base San Diego, and the acquisition of the “North Island” of the Coronado peninsula, established the Navy’s base of operation and point of expansion across much of the bay, and other parts of San Diego County. During, and immediately following ~~World War I~~ ~~the First World War (WWI)~~ there was substantial development in infrastructure and industry to support the military and accommodate soldiers, sailors, and defense industry workers. Following the use of Balboa Park as part of the Navy’s training regime during WWI, in an effort to relocate the Recruit Training Station away from San Francisco, San Diego offered the Navy more than 200 acres of land on Dutch Flats between Old Town and Point Loma for a Naval Training Center. The U.S. Congress authorized the center in 1919, with construction beginning in 1921, and commissioning in 1923. Also in 1917, the U.S. Army established Camp Kearny on the site of what is now Marine Corps Air Station Miramar. Camp Kearny was named after Brigadier General Stephen W. Kearny, who was instrumental in the Mexican–American War. In 1943, Camp Kearny was commissioned as the Naval Auxiliary Air Station Camp Kearny; it continued to operate until 1946, when it was transferred to the Marines. The establishment, expansion, and creation of additional facilities between ~~World War I and II~~ ~~WWI and WWII~~, and during the decades following brought hundreds of thousands of men and women to the region, many of whom chose to stay, engendering numerous expansionist projects towards housing and support business enterprises.

Following the ~~World War II~~ ~~Second World War~~, San Diego, like many urban areas, saw an ever-increasing demand for housing and services. New lands were developed wholesale, with new housing tracts, strip malls and shopping centers, and other services all made possible with federally subsidized funding programs such as loans through the Federal Housing Administration, the development of transportation systems beyond the urban core, including arterial corridors and freeways, and other infrastructural assets such as trunk sewers and raw water aqueducts. These core items allowed for the development of “bedroom” communities and industrial areas away from the central area of the City, requiring the need for focused planning, or Master Plans, to “shape” the development trend of particular regions within the City. Places such as Clairemont, Kearny Mesa, Del Cerro, Allied Gardens, large portions of southeast San Diego, and Encanto witnessed tremendous growth as a result of transportation infrastructure development, while University Mira Mesa, Rancho Bernardo, Scripps Ranch, Carmel Valley, Tierrasanta, Otay Mesa, and San Ysidro furthered the suburbanization of the City with Master Plan development, confining development through the use of codes, covenants and restrictions, and homeowners associations.

#### **d. Architectural History**

Throughout its history, the architectural style of the San Diego region has reflected the conditions of necessity and fashion. Each group has facilitated their adaptation to the landscape through the use of systems and structures that ensure their user’s survival. The remnants of these artifacts offer clues to the social and cultural history of the peoples of the past, both distant and recent.

With the arrival of the Spanish missionaries, military personnel, and settlers, the first formal architecture was established in the late eighteenth century. Mission and military architecture were

the dominant forms, with small, vernacular buildings reflecting the constraints and social norms related to the use of adobe block as the primary building material.

The use of adobe block, and Spanish colonial architectural style would persist through the Mexican period, and even into the early American period. The use of adobe block was particularly suitable in an area without a developed lumber industry. By the time New San Diego and Horton's Addition were developed, industry made shipping prefabricated houses available to those who could afford them, while others constructed buildings from raw lumber shipped and warehoused at the new wharves in San Diego Bay. These buildings mostly reflected the origins of both the settlers, and the prefabricating companies: the East Coast. By the 1870s and 1880s, however, new construction was frequently in the Victorian style. The following narrative is taken from the ~~City of San Diego~~ General Plan (City of San Diego 2008).

San Diego's built environment spans over 200 years of architectural history. The real urbanization of the City as it is today began in 1869 when Alonzo Horton moved the center of commerce and government from Old Town (Old San Diego) to New Town (downtown). Development spread from downtown based on a variety of factors, including the availability of potable water and transportation corridors. Factors such as views, and access to public facilities affected land values, which in turn affected the character of neighborhoods that developed.

During the Victorian Era of the late 1800s and early 1900s, the areas of Golden Hill, Uptown, Banker's Hill, and Sherman Heights were developed. Examples of the Victorian Era architectural styles remain in those communities, as well as in Little Italy.

Little Italy developed in the same time period. The earliest development of the Little Italy area was by Chinese and Japanese fishermen, who occupied stilt homes along the bay. After the 1905 earthquake in San Francisco, many Portuguese and Italian fishermen moved from San Francisco into the area; it was close to the water and the distance from downtown made land more affordable.

Barrio Logan began as a residential area and by the 1920s the community, along with Logan Heights, was home to the largest concentration of Mexican families in the City during the 1920s due to homeownership opportunities that were not present in other areas of the City. There were a few industrial facilities east of the railroad tracks at the beginning of the 1920s, but by 1946 industrial encroachment into the residential and commercial areas dramatically increased due to Barrio Logan's proximity to rail freight and shipping freight docks and the relatively flat topography. In the 1950s, the ~~City of San Diego~~ rezoned the greater Logan Heights area—especially in present-day Barrio Logan—from primarily residential to an industrial or mixed-use classification. This zoning change resulted in major changes to the land use and character of the neighborhood.

San Ysidro began to be developed at about the same time, the turn of the century. The early settlers were followers of the Little Landers movement. There, the pattern of development was lots designed to accommodate small plots of land for each homeowner to farm as part of a farming-residential cooperative community. Nearby Otay Mesa-Nestor began to be developed by farmers of Germanic and Swiss background. Some of the prime citrus groves in California were in the Otay Mesa-Nestor area; in addition, there were grape growers of Italian heritage who settled in the Otay River valley and tributary canyons and produced wine for commercial purposes.

At the time downtown was being built, there began to be summer cottage/retreat development in what are now the beach communities and La Jolla area. The early structures in these areas were not of substantial construction; it was primarily temporary vacation housing.

Development spread to the Greater North Park and Mission Hills areas during the early 1900s. The neighborhoods were built as small lots, a single lot at a time; there was not large tract housing development of those neighborhoods. It provided affordable housing away from the downtown area, and development expanded as transportation improved. There was farming and ranching in Mission Valley until the middle portion of the twentieth century when the uses were converted to commercial and residential. There were dairy farms and chicken ranches adjacent to the San Diego River where now there are motels, restaurants, office complexes and regional shopping malls.

There was little development north of the San Diego River until Linda Vista was developed as military housing in the 1940s. The federal government improved public facilities and extended water and sewer pipelines to the area. From Linda Vista, development spread north of Mission Valley to the Clairemont Mesa and Kearny Mesa areas. Development in these communities was mixed-use and residential on moderate size lots.

San Diego State University was established in the 1920s; development of the state college area began then and the development of the Navajo community was outgrowth from the college area and from the west.

Tierrasanta, previously owned by the U.S. Navy was developed in the 1970s. It was one of the first planned unit developments with segregation of uses. Tierrasanta and many of the communities that have developed since, such as Rancho Peñasquitos and Rancho Bernardo, represent the typical development pattern in San Diego in the last 25 to 30 years: uses are well segregated with commercial uses located along the main thoroughfares, and the residential uses are located in between. Industrial uses are located in planned industrial parks.

Examples of every major period and style remain, although few areas retain neighborhood-level architectural integrity due to several major building booms when older structures were demolished prior to preservation movements and stricter regulations regarding historic structures. Among the recognized styles in San Diego are Spanish Colonial, Pre-Railroad New England, National Vernacular, Victorian Italianate, Stick, Queen Anne, Colonial Revival, Neoclassical, Shingle, Folk Victorian, Mission, Craftsman, Monterey Revival, Italian Renaissance, Spanish Eclectic, Egyptian Revival, Tudor Revival, Modernistic and International (McAlester and McAlester 1990).

#### **4.4.1.4 University Community Plan Update Cultural and Historical Background**

The historical background that follows is from the Cultural Resources Constraints and Sensitivity Analysis for the University CPU (see Appendix H-1).

## a. Prehistory and Spanish Period

During the prehistoric and ethnohistoric periods a large village site was located along the western boundary of the University CPU area. In addition, archaeological records show that the University CPU area was heavily used not only for procurement of natural plant and animal resources, but also for the numerous small canyons and drainages which provided sources of fresh water and provided travel routes between inland and coastal settlements.

Early Spanish colonial use of the University CPU area was focused on the western boundary of the University CPU area, along the coastal canyons. Following initial contact and the establishment of El Presidio Real de San Diego, a Spanish exploration party departed on July 14, 1769, on a trip north to Monterey. The expedition, led by Don Gaspár de Portolá, was started as part of a larger plan to map the coastal regions of New California and to discover new locations for missions and presidios. Father Juan Crespí, a Franciscan who had previously aided Father ~~Junipero~~ Junípero Serra in initializing the mission chain in New California, accompanied Portolá along his journey, recording informative notes about the newly explored areas. Crespí noted that following the departure of the base camp at the foot of Presidio Hill, the exploration party followed existing Native American trails that proceeded northward along False Bay (Mission Bay). At the mouth of Rose Canyon, the party encountered a large village which they named *Rinconada*, immediately to the west of the University CPU area. Following their visit at *Rinconada*, the expedition continued northeast through a sheltered valley and up a portion of Rose Canyon, in which they camped for one night. The Spanish expedition continued their trek the next morning, continuing north through Rose Canyon, across the Miramar Mesa, and then west into a valley (potentially either Soledad or Sorrento Valley) which was named Valle de Santa Ysabel after the Queen of Portugal.

As the expedition neared what is now Sorrento Valley, Crespí described that the valley looked “to us to be nothing less than a cultivated cornfield or farm, on account of its mass of verdure”. On a small knoll next to the valley, the exploratory team saw a village containing six brush houses, and the team proceeded into the village after ascertaining that the natives were receptive. The village was named *Ystagua* or *Estagua*, after the Spanish explorers adapted the local name, but was also later called Ranchería de la Nuestra Señora de la Soledad in mission records. After resting for a night at *Ystagua*, the exploration continued north, entering San Dieguito Valley, which was renamed San Jacome de la Marca by Crespí. Upon arriving, Portolá made camp near a large pool of fresh water, west of present day El Camino Real. The exploration party left San Dieguito on July 16, 1769, heading up a curving canyon across Rancho Santa Fe and north on El Camino Real to Escondido Creek. From Escondido Creek, the expedition moved north and west, traveling to San Alejo (San Elijo), which was later renamed to Batiquitos, and then crossing Agua Hedionda Creek on July 17.

The village of *Ystagua* is significant to the University CPU area as it represents the closest of the documented lipai villages during the ethnohistoric period, and it is located adjacent to the eastern boundary of the University CPU area. The village site was a large central village and home of the Captain (*Kwaaypaay*) band. From *Ystagua* the *Kwaaypaay* oversaw all use of Torrey Pines Bluff, adjacent beaches and the coastal lagoon, and several satellite villages from the coast inland to Poway. The *Kwaaypaay* maintained control of Torrey Pines, a unique regional resource, and the pines were maintained and protected from damage. *Ystagua* was an important center for trade and interaction throughout southern California, and the *Kwayyapaay* maintained close relationships with

the villages of Pamo and Mesa Grande, as well as coastal villages around San Diego, Mission Bay, and coastal locations within north San Diego County.

Following initial contact with the Spanish explorers, the inhabitants of *Ystagua* had repeated contact with the Spaniards over the next several years. The village was recorded in the mission records as Rancheriade la Nuestra Senora del la Soledad or Ranchera de Los Peñasquitos. Between 1774 and 1800, Spanish priests baptized 142 individuals at the village, including 105 children, 27 women, and 10 men, although the exact records are incomplete as it was common practice for Spanish priests to baptize deceased individuals. In 1775, 18 Kumeyaay villages joined together and stormed the Presidio and the Mission San Diego de Alcalá. *Ystagua* and many coastal villages did not participate against the Spaniards. Following the uprising, repeated contact with Spanish missionaries continued until 1800, at which time the last baptism was recorded at the village. Although other coastal villages continued to provide neophytes to the Mission, no additional converts came from *Ystagua*, suggesting the village may have been abandoned.

During its heyday, the village of *Ystagua* was a socio-economic hub for southern California indigenous peoples. Coastal access for inland groups and access to foothill and mountain environments for coastal traders was made possible through Peñasquitos Creek, along the northern boundary of the University CPU area. The drainage not only provided a preferential access route between coastal and inland communities but also ample natural resources for local inhabitants. As time passed, the same resources were eventually relied upon by the Spanish and, later, Mexican ranchers.

## **b. Mexican Period**

Following the relinquishment of Spanish territories to the newly established Mexican government in 1821, eastern Peñasquitos Creek became the new site for the Rancho de los Peñasquitos, now the present-day site of the Johnson-Taylor Adobe, located outside of and east-northeast of the University CPU area. The site presently consists of a historic structure which was constructed on top of a long-term Native American habitation site. The prehistoric site, originally recorded by R.H. Norwood in 1977, was explored by RECON Environmental, Inc. in 1985 and was found to have been in regular use between 7,800 BP to 1840 AD. The habitation site was located around a natural spring which was supplemented by the seasonal flow of Los Peñasquitos Creek.

The historic adobe was constructed later during the middle of the nineteenth century. During the Mexican Period, Captain Francisco Maria Ruiz was granted the Rancho de los Peñasquitos, a private rancho that encompassed nearly 8,500 acres (Pourade 1963, cited in Smith and Kraft 2013), within which Ruiz built the Ruiz-Alvarado Adobe near the convergence of Lopez Canyon and Los Peñasquitos Canyon. A second tract of land was petitioned for and granted to Ruiz, named El Cuervo, encompassing the western half of Peñasquitos Canyon. Portions of this second land grant are present within the University CPU area. The El Cuervo Adobe was constructed within the western portion of Los Peñasquitos Canyon, most likely during the 1830s. Ruiz later deeded the Rancho de los Peñasquitos and the El Cuervo land grants to his friend, Francisco Maria Alvarado, whose family occupied the eastern adobe dwelling. Later, around 1857, Alvarado's daughter married Captain George Alonzo Johnson, and both were given the title to Rancho de los Peñasquitos in 1862. A small



adobe structure was constructed directly south of the present-day location of the Native American occupation site.

In 1862, the Johnson Adobe (now known as the Johnson-Taylor Adobe) was constructed. Several additional structures and outbuildings were added around the original adobe through 1868. The ranch was later sold to Jacob Taylor in 1885, who remodeled the ranch house and converted it to a house-hotel and stagecoach stop for a short while, servicing areas between the hotel and the Del Mar railroad station. In 1913 the entire ranch burned down; however, it was rebuilt and used as a bunkhouse up until 1940, when it was remodeled again to include updated lavatory and kitchen facilities.

During this period Rose Canyon, which was called La Cañada de la Yeguas, was used to raise horses.

### **c. American Period**

#### ***Camp Callan***

Camp Callan was created in 1940 as part of U.S. military preparation efforts for World War II. The camp's purpose was to serve as a coastal defense position that could defend San Diego from potential attacks and to serve as a training facility for coastal defense artillery units. Seven hundred and ten acres were leased from the City by the United States Army to create the camp, with additional acreage being granted from private sources. Camp Callan was located on Torrey Pines Mesa bordering the Pacific Ocean and measured 3 miles long by a half-mile wide. Initial construction of the camp occurred between October and November 1940. The camp occupied a rectangular area of land, with the layout consisting of a functional block and grid pattern. Each block housed a different battalion or operational facility in addition to its own set of barracks and mess halls. Camp Callan opened in 1941, and at its height covered 23 blocks and trained 15,000 servicemen in each 13-week training cycle. Following the end of World War II in 1945, the City of San Diego retook possession of the camp in 1946 and deconstructed the entire facility, selling off the lumber, plumbing, and electrical fixtures. Following deconstruction, the area formerly housing Camp Callan remained undeveloped until 1956, when a special City election granted 100 acres of the former camp site to be allocated for the construction of a public golf course with the remaining acreage being donated to the State of California. The development of the golf course was given to William F. Bell Jr., whose father William F. Bell Sr. was a legendary course architect who had previously envisioned a wind- and sea-swept course design to provide golfers both rugged play and breathtaking surroundings.

#### ***Camp Mathews***

Within the current University of California, San Diego (UCSD) campus the U.S. Marine Corps leased the land from the City of San Diego, and developed a rifle range, campsite, and parade ground. By 1924 additional support buildings were constructed. By 1942 the camp was called Camp Matthews and consisted of 577 acres. The area was active for training during World War II and by 1949 it contained 15 active gunnery ranges, which measured up to 1,000 yards in length. In 1962 the Navy transferred the land to UCSD and by 1964 the military had completely left the area.

### ***Torrey Pines State Natural Reserve***

The area encompassing the Torrey Pines State Natural Reserve has long been a place of interest, dating back as far as the early Spanish explorers, who referred to the areas as Punto de Los Arboles or "Point of Trees". As groves of trees were uncommon along the southern California coast, Spanish explorers used the area as both a landmark and as a warning for ships that they were too close to shore in foggy weather. The first modern account of the Torrey pine occurred in 1850. Prior to 1850, these trees were referred to as Soledad Pines, meaning Solitary Pines. In 1850, the same year that California joined the United States, Dr. Charles Christopher Parry was in San Diego as a botanist for the U.S.-Mexico Boundary Survey. Parry was a medical doctor with an interest in botany, with specific interest in why plants grew where they did and how Native Americans used local species. The area encompassing the Torrey Pines State Natural Reserve was brought to his attention by Dr. John Le Conte, an entomologist. Parry studied the tree and named it for his mentor, Dr. John Torrey, who was one of the leading botanists of his time. Although Parry named the pine after his mentor, Torrey never was able to visit and examine the trees himself, although Parry did send him samples of seeds, branches, and cones. In 1883, Parry revisited the area and was surprised at the lack of protection for the groves of Torrey pines. He later composed a historical and scientific account of the pine, emphasizing the need to protect the rare species, all of which was presented to the San Diego Society of Natural History. In 1885, the San Diego County Board of Supervisors started posting signs citing a reward of \$100 for the apprehension of anyone vandalizing a Torrey pine. Additional calls for protection came in 1888 by botanist J.G. Lemmon of the newly formed California State Board of Forestry, who suggested that appropriate legislation be mandated to protect the tree. However, in 1890, tracts of pueblo lands in San Diego were leased for cattle and sheep grazing, and numerous Torrey pines were cut and hauled away to be used for firewood during efforts to clear the land for grazing use.

In 1899, the City Council passed an ordinance to designate 364 acres of pueblo lands as a public park, although the ordinance contained no provisions for protecting the rare trees. Between 1908 and 1911, Ellen Browning Scripps acquired two additional pueblo lots and willed them to the people of San Diego, effectively adding the North Grove and estuary areas to the park. In 1916, Guy Fleming and Ralph Sumner conducted botanical studies at the park and detailed damages caused by picnickers and campers, calling for additional measures of protection of the Torrey pines. The call was heeded by Ms. Scripps, who spearheaded a preservation movement for the park. In 1921, Ms. Scripps and the City Park Commission appointed Guy Fleming as the first custodian of the park. A year later, Ms. Smith retained Ralph Cornell, a well-known landscape architect, to determine a long-term plan for the park. Cornell's 3-part plan called for restrictions to changing the original landscape, restrictions to introducing non-native plants or features to the park, and restrictions on over-cultivating the Torrey pines.

During the early to mid-20th century, the Torrey Pines State Natural Reserve continued to expand. In 1922, Ms. Scripps financed the construction of the Torrey Pines Lodge, which was constructed using adobe bricks. The lodge was styled after the Hopi houses of the Arizona desert, and was completed in February 1923. The Lodge was a restaurant with stumpy tables, chintz curtains, lampshades constructed of Torrey pine needles, and a jukebox. The structure is currently used as the Ranger Station and Visitor Center, with the ranger office being the former kitchen and food storage area (Schulman n.d.(c)).

In 1924, the San Diego City Council added other pueblo lands to the park at the requests for expansion by the City Park Commission and other civic groups. Following the inclusion of the additional lands, the park now comprised approximately 1,000 acres of cliffs, canyons, mesas, and beach. Between 1928 and 1930, the League to Save Torrey Pines won against a proposed cliff road above the beach. With the beginning of World War II, the U.S. Army leased 750 acres of Torrey Pines Mesa from the City of San Diego to be designated as Camp Callan and to be used for training purposes. The portion of Camp Callan within the park extended from the southernmost boundaries of Torrey Pines Park towards the Muir Campus of UCSD. The camp opened January 1941 and closed November 1945, with the park itself kept open to the public during this span. Following the closing of Camp Callan, the military buildings were torn down and used for lumber to build homes for veterans.

Although the park lands afforded some protection for the Torrey pines from over-cultivation, the authority of the ~~City of San Diego~~ Department of Parks and Recreation did not have legal authority to protect the trees and other endangered species. In 1956, a special City election resulted in the donation of the nearly 1,000-acre park to the State of California in order to gain a higher level of protection. Approximately 100 acres of the park were appropriated for the construction of a public golf course. In 1959, the State Park became official, and in 2007 the nomenclature was changed to Torrey Pines State Natural Reserve. In 1970, the Torrey Pines Natural Reserve Extension was acquired following efforts of local conservation groups who were concerned with the bulldozing of Torrey pines on the north side of Los Peñasquitos lagoon for residential development. The 1970 Extension added approximately 197 acres and 1,500 trees.

### ***University of California, San Diego***

Prior to the American Period, the lands which house the area that is now UCSD remained largely undeveloped. During the Spanish Period, this area remained unchanged due to its distance from the mission, presidio, and pueblo. This area later became part of the 48,000 acres which were designated as San Diego's publicly owned pueblo lands and was used primarily for cattle grazing. Following the end of the Mexican-American War in 1848, the United States Congress enacted the Act of 1851 which installed procedures for gaining clear titles to lands claimed by individual rancho grantees. The Act of 1851 also detailed procedures for gaining titles to pueblo lands, which had been claimed by the municipal authorities of the former Mexican pueblos. Three years later, in 1854, the Board of United States Land Commissioners confirmed San Diego's claim to its pueblo lands, but the official patent was not issued until 1874. During this time, the area housing UCSD remained undeveloped. Development within the area immediately to the west of the University CPU area began in 1910, after several years of use for biological research. By 1925, the campus was called the Scripps Institution of Oceanography. Development on the UCSD main campus began in 1960 on what was the former Camp Matthews, and the first undergraduates began in 1964.

### ***Atchison, Topeka and Santa Fe Railway***

The rail line bisecting the University CPU area through Rose Canyon, and immediately east of the eastern boundary of the University CPU area, was originally constructed between 1882 and 1885 by the California Southern Railroad and was known as the Surf Line. The rail line connected San Diego to Los Angeles and contributed to a population boom in San Diego County in the late 1880s. By 1895 the Atchison, Topeka and Santa Fe Railway had purchased the rail line. By 1912, there was a train

stop in Rose Canyon, and, in the 1920s, the Elvira Station was constructed, near the southwestern boundary of the University CPU area. The station closed in the 1950s. The rail line within Rose Canyon frequently washed out from floods in 1883, 1994, and 1916. The Surf Line passing through Rose Canyon was heavily utilized for decades as a passenger and freight rail, and during World War I and II.

### ***Rose Canyon***

Mail service during the American Period began along the road through Rose Canyon in 1847, and in 1969 passenger stagecoaches started to travel the route. Clay from Rose Canyon was used to make bricks. Louis Rose, for whom the canyon was named, was one of the first to purchase land in the area, and he constructed a tannery along with maintaining a vineyard, garden, tobacco plants, and grazing pastures in the canyon. A portion of Rose Canyon was declared an open space park in 1979 and was chartered by the City of San Diego Parks and Recreation Department in 1992.

#### **4.4.1.5 University Community Plan Update Historic Context Statement and Reconnaissance Survey**

In addition to the historic context provided above, a Historic Context Statement was prepared (see Appendix B) to identify the significant historical themes in the development of the University community and the property types associated with those themes. A Historic Resource Reconnaissance Survey (see Appendix C) was prepared which evaluated 78 residential communities within the University CPU area constructed between 1960 and 1990 with the potential to fall under the umbrella of Master Planned Communities. Properties that were found to be tract developments and cluster developments were also identified and researched to determine if they rose to meet the basic character-defining features of the Master Planned Community. The survey addressed these communities from a district perspective rather than as individual properties because tract style homes typically do not have the ability to rise to a level of individual significance under most designation criteria.

The Historic Resource Reconnaissance Survey established a three-tiered system to evaluate the potential eligibility of these Post-War master-planned communities. As a result of the survey and research, tier numbers were assigned to neighborhoods with Tier 1 communities being those flagged for additional study with the highest potential for significance, followed by Tier 2 communities and lastly Tier 3 communities. Details of the requirements of the tiers are provided in Appendix C. The survey identified five residential master planned communities (Tier 1) that warrant further evaluation to determine whether they are eligible for historic designation. Four of the master planned communities represent the work of notable architects Dan Saxon Palmer and William Krisel, and the fifth, La Jolla Colony comprised of 10 individual neighborhoods, represents a master-planned community constructed in the late 1980s utilizing aspects of the New Urbanism design movement with varied housing typologies, incorporation of green spaces, pedestrian pathways, and other recreational features. The survey found the remaining residential master planned communities ineligible for historic district designation. The University CPU area also contains three other designated historic resources: the Torrey Pines Gliderport site within Torrey Pines City Park (Historical Resources Board [HRB]-# 315), the Guy and Margaret Fleming House, and an archaeological and cultural resources site (HRB-#1450).

### 4.4.1.6 Hillcrest Focused Plan Amendment Cultural and Historic Background

Information regarding the historical background for the Uptown Community Plan area, where the Hillcrest FPA area is located, is hereby incorporated by reference from the Final PEIR for the Uptown Community Plan Update. Specific to the Hillcrest FPA area, as stated above in Section 4.4.1.1c, there are 53 historical resources, both designated and potentially historic, within the Hillcrest FPA area.

Although no significant archaeological resources have been identified within the Hillcrest FPA area, significant resources are found in the vicinity of the Uptown community. As discussed in the Uptown Community Plan Update Final PEIR (2015), researchers such as Gallegos and others (1998) identify one named Kumeyaay village in the vicinity of the community of Uptown, the village of Cosoy/Kosaii/Kosa'aay. For locations, Gallegos and others depended on the interpretation of the ethnohistoric literature of Florence Shipek (e.g., 1976). Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego River, which is located approximately 0.5 miles from the Uptown community planning area, provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. Major coastal villages were known to have existed along the San Diego River, including the village of Cosoy/Kosaii/Kosa'aay near the mouth of the San Diego River (Kroeber 1925). Although the actual location of the village is unknown, Bancroft (1884) reported that a site called Cosoy/Kosaii/Kosa'aay by the Native Americans was in the vicinity of Presidio Hill and Old Town, located less than 1 mile west of the Uptown community planning area boundary. Several investigations have identified possible locations for the village of Cosoy/Kosaii/Kosa'aay (Clement and Van Bueren 1993; Felton 1996); however, the actual site has never been found. Several additional large villages have been documented along the San Diego River through ethnographic accounts and archaeological investigations in the area. These include Nipaquay, located near present-day Mission San Diego de Alcalá (Kyle 1996); El Corral, located near Mission Gorge; Santee Greens, located in eastern Santee (Berryman 1981); and El Capitan, located approximately 21 miles upstream of the Uptown community planning area, now covered by the El Capitan Reservoir (Pourade 1961).

As part of the Hillcrest FPA, a historic context statement was prepared which focused on the lesbian, gay, bisexual, transgender, and queer (LGBTQ+) history and resources within the FPA area (see Appendix H-2). This context statement built off of the 2016 Citywide LGBTQ Historic Context Statement with additional research and analysis specific to the Hillcrest community. The Hillcrest LGBTQ+ Historic Context Statement supported the evaluation of the Hillcrest Historic District, which was first identified as a potential historic district during the adoption of the Uptown CPU in 2016. The Hillcrest LGBTQ+ Historic Context Statement and associated field work also identified several properties which could be eligible for designation as part of a future Multiple Property Listing.

As part of the Hillcrest FPA, an intensive-level survey was conducted within the potential historic district, which is bounded by Washington Avenue, 6<sup>th</sup> Avenue, Pennsylvania Avenue and First Avenue. The intensive level survey revealed that a smaller area centered around 5<sup>th</sup> Avenue between University Avenue and Robinson Avenue was eligible for designation as a historic district under City HRB Criteria A and C for its significance related to early 20th century commercial development supporting the surrounding streetcar suburb, and for its significant association with the LGBTQ+

community. The district consists of 29 parcels containing 21 contributing resources and 11 noncontributing buildings. The contributing buildings include a variety of one- and two-story commercial buildings, typically One-Part or Two-Part Commercial Block buildings designed and accented in styles popular in the first half of the 20th Century, including Beaux Arts, Mission Revival, Spanish Colonial Revival, Art Moderne, and Art Deco. Two neon signs are among the 21 identified contributing resources. Buildings are typically set at the property lines, resulting in non-descript, utilitarian side and rear facades. Storefronts line the streets and often exhibit replacement of storefront glazing and door systems as is typical for commercial buildings and uses. The streets within the district include landscaped parkways, which are most densely vegetated along 5<sup>th</sup> Avenue. The intensive-level survey resulted in a historic district nomination, which is in process and is scheduled to be brought to the City's ~~HRB~~ Historical Resources Board for consideration of designation shortly after adoption of the Hillcrest FPA. As part of the designation process, the HRB will review the nomination and if designated, classify the properties within the district as either contributing or non-contributing resources. A decision by the ~~HRB~~ Board to designate a historic district may be appealed to the City Council on limited grounds.

## 4.4.2 Regulatory Setting

### 4.4.2.1 Federal Regulations

#### a. National Historic Preservation Act of 1966 and National Register of Historic Places

The National Historic Preservation Act of 1966 established the National Register of Historic Places (NRHP) as the official federal list of cultural resources that have been nominated by state offices for their significance at the local, state, or federal level. Listing in the NRHP provides recognition that a property is historically significant to the nation, the state, or the community. Properties listed (or potentially eligible for listing) in the NRHP must meet certain significance criteria and possess integrity of form, location, or setting. Barring exceptional circumstances, resources generally must be at least 50 years old to be considered for listing in the NRHP.

Criteria for listing in the NRHP are stated in the Code of Federal Regulations (CFR) (36 CFR 60). A resource may qualify for listing if there is quality of significance in American history, architecture, archaeology, engineering, and culture present in districts, sites, buildings, structures, and objects that possess integrity of location, design, setting, materials, workmanship, feeling, and association, and where such resources:

- Are associated with events that have made a significant contribution to the broad patterns of history.
- Are associated with the lives of persons significant in the past.
- Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.
- Have yielded, or may be likely to yield, information important in prehistory or history.

Eligible properties must meet at least one of the NRHP criteria and exhibit integrity, measured by the degree to which the resource retains its historical properties and conveys its historical character, the degree to which the original historic fabric has been retained, and the reversibility of changes to the property. The fourth criterion is typically reserved for archaeological resources. These criteria have largely been incorporated into the CEQA Guidelines (Section 15064.5) as well.

### ***Criteria Considerations***

Ordinarily cemeteries, birthplaces, or graves of historical figures, properties owned by religious institutions or used for religious purposes, structures that have been moved from their original locations, reconstructed historic buildings, properties primarily commemorative in nature, and properties that have achieved significance within the past 50 years shall not be considered eligible for the National Register. However, such properties will qualify if they are integral parts of districts that do meet the criteria if they fall within the following categories:

- (a) A religious property deriving primary significance from architectural or artistic distinction or historical importance; or
- (b) A building or structure removed from its original location but which is significant primarily for architectural value, or which is the surviving structure most importantly associated with a historic person or event; or
- (c) A birthplace or grave of a historical figure of outstanding importance if there is no appropriate site or building directly associated with his productive life; or
- (d) A cemetery which derives its primary significance from graves of persons of transcendent importance, from age, from distinctive design features, or from association with historic events; or
- (e) A reconstructed building when accurately executed in a suitable environment and presented in a dignified manner as part of a restoration master plan, and when no other building or structure with the same association has survived; or
- (f) A property primarily commemorative in intent if design, age, tradition, or symbolic value has invested it with its own exceptional significance; or
- (g) A property achieving significance within the past 50 years if it is of exceptional importance.

## **b. National Environmental Policy Act**

The National Environmental Policy Act (NEPA) was signed into law on January 1, 1970. NEPA created an environmental review process requiring federal agencies to consider the effects of their actions on the environment. Under NEPA, all federal agencies must carry out their regulations, policies, and programs in accordance with NEPA's policies for environmental protection, including project compliance with Section 106 of the National Historic Preservation Act, as previously discussed. Any potential future development that requires a federal approval would be subject to NEPA requirements.

### **c. The Secretary of the Interior Standards and Guidelines for Archaeology and Historic Preservation**

The Secretary of the Interior Standards and Guidelines for Archaeology and Historic Preservation are not regulatory and do not set or interpret agency policy. They are intended to provide technical advice about archaeological and historic preservation activities and methods. Federal agency personnel responsible for cultural resource management pursuant to Section 110 of the National Historic Preservation Act, State Historic Preservation Offices responsible under the National Historic Preservation Act, local governments wishing to establish a comprehensive approach, and other individuals and organizations needing basic technical standards and guidelines for historic preservation activities are encouraged to use these standards.

### **d. Native American Graves Protection and Repatriation Act**

The Native American Graves Protection and Repatriation Act (NAGPRA) was passed in 1990 to provide for the protection of Native American graves. The act conveys to Native Americans of demonstrated lineal descent the human remains, including the funerary or religious items, that are held by federal agencies and federally supported museums, or that have been recovered from federal lands. NAGPRA makes the sale or purchase of Native American remains illegal, whether or not they were derived from federal or Native American lands.

## **4.4.2.2 State Regulations**

### **a. California Register of Historical Resources**

The California Office of Historic Preservation maintains the California Register of Historical Resources (CRHR). The CRHR is the authoritative guide to the state's significant historic and archeological resources. The program provides for the identification, evaluation, registration, and protection of California's historical resources. The CRHR encourages public recognition and protection of resources of architectural, historic, archaeological, and cultural significance; identifies historical resources for State and local planning purposes; determines eligibility for State historic preservation grant funding; and affords certain protection to these resources under CEQA.

The CRHR has also established context types to be used when evaluating the eligibility of a property or resource for listing. The four criteria are as follows:

1. It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States.
2. It is associated with the lives of persons important to local, California, or national history.
3. It embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values.
4. It has yielded, or is likely to yield, information important to prehistory or history of the local area, California, or the nation.



Similar to the NRHP, eligibility for the CRHR requires an establishment of physical integrity, including the four criteria previously described. California's list of special considerations is less stringent than the NRHP, providing allowances for relocated buildings, structures, or objects as reduced requirements for physical integrity. CEQA Guidelines Section 15064.5 and Public Resources Code (PRC) Section 21083.2(g) define the criteria for determining the significance of historical resources. The term "historical resources" refers to all prehistoric and historic resources, including archaeological sites, traditional cultural properties, and historic buildings, structures, sites, objects, landscapes, etc. Since resources that are not listed or determined eligible for the state or local registers may still be historically significant, their significance shall be determined if they are affected by a project. The significance of a historical resource under Criterion 4 rests on its ability to address important research questions. Most archaeological sites which qualify for the CRHR do so under Criterion 4 (i.e., research potential).

### **b. California Environmental Quality Act**

For the purposes of CEQA, a significant historical resource is one that qualifies for the CRHR or is listed in a local historic register or deemed significant in an historical resources survey, as provided under Section 5024.1(g) of the PRC. A resource that is not listed in or is not determined to be eligible for listing in the CRHR, is not included in a local register or historic resources, or is not deemed significant in a historical resources survey may nonetheless be deemed significant by a CEQA lead agency.

As indicated above, the California criteria (CEQA Guidelines Section 15064.5) for the registration of significant architectural, archaeological, and historical resources in the CRHR are nearly identical to those for the NRHP. Furthermore, PRC Section 21083.2(g) defines the criteria for determining the significance of archaeological resources. These criteria include definitions for a "unique" resource, based on its:

1. Containing information needed to answer important scientific research questions and that there is a demonstrable public interest in that information;
2. Having a special and particular quality such as being the oldest or best available example of its type; and/or
3. Being directly associated with a scientifically recognized important prehistoric or historic event or person.

### **c. California Public Resources Code**

Sections 5097– 5097.6 of the PRC outline the requirements for cultural resource analysis prior to the commencement of any construction project on state lands. The state agency proposing the project may conduct the cultural resource analysis or they may contract with the State Department of Parks and Recreation. In addition, this section stipulates that the unauthorized disturbance or removal of archaeological, historical, or paleontological resources located on public lands is a misdemeanor. It prohibits the knowing destruction of objects of antiquity without a permit (expressed permission) on public lands and provides for criminal sanctions. This section was amended in 1987 to require

consultation with the California Native American Heritage Commission (NAHC) whenever Native American graves are found. Violations for the taking or possessing of remains or artifacts are felonies.

PRC Section 5097.9-991, regarding Native American heritage, outlines protections for Native American religion from public agencies and private parties using or occupying public property. Also protected by this code are Native American sanctified cemeteries, places of worship, religious or ceremonial sites, or sacred shrines located on public property.

#### **d. California Health and Safety Code**

Section 7052 of the California Health and Safety Code (H&SC) makes the willful mutilation, disinterment, or removal of human remains a felony. H&SC Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC.

H&SC Section 8010-8030 constitutes the California Native American Graves Protection and Repatriation Act of 2001 (CalNAGPRA). CalNAGPRA, like the federal act, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations. The H&SC provides a process and requirements for the identification and repatriation of collections of human remains or cultural items to the appropriate tribes from any state agency or museum that receives state funding.

#### **e. California Government Code Section 65040.2(g)**

California Government Code Section 65040.2(g) provides guidelines for consulting with Native American tribes for the following: (1) the preservation of, or the mitigation of impacts to places, features, and objects described in PRC Sections 5097.9 and 5097.993; (2) procedures for identifying through the NAHC the appropriate California Native American tribes; (3) procedures for continuing to protect the confidentiality of information concerning the specific identity, location, character, and use of those places, features, and objects; and (4) procedures to facilitate voluntary landowner participation to preserve and protect the specific identity, location, character, and use of those places, features, and objects.

#### **f. Native American Burials (PRC Section 5097 et seq.)**

State law addresses the disposition of Native American burials in archaeological sites and protects such remains from disturbance, vandalism, or inadvertent destruction; establishes procedures to be implemented if Native American skeletal remains are discovered during construction of a project; and designates the NAHC to resolve disputes regarding the disposition of such remains. The Native American Historic Resource Protection Act (PRC Sections 5097.993–5097.994) makes it a misdemeanor punishable by up to a year in jail to deface or destroy an Indian historic or cultural site that is listed or may be eligible for listing in the CRHR. In 2006, Assembly Bill (AB) 2641 (Coto) amended the PRC to provide for the protection of human remains when discovered, as well as

conferral with descendants to make recommendations or preferences for treatment of human remains. A landowner, upon discovery of human remains, is required to ensure that the immediate vicinity, as described, is not damaged or disturbed, until specific conditions are met, including discussing and conferring, as defined, with the descendants regarding their preferences for treatment. The amended PRC, along with the California Native American Graves and Repatriation Act of 2001 [~~H&S~~ Health and Safety Code Section 8010-8011] ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations, and that any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

### 4.4.2.3 Local Regulations

#### a. Historical Resources Regulations

The City's Historical Resources Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 3, Division 2) were adopted in January 2000, providing a balance between sound historic preservation principles and the rights of private property owners. The regulations have been developed to implement applicable local, state, and federal policies and mandates, including the City's General Plan, CEQA exemptions and guidelines, and Section 106 of the National Historic Preservation Act of 1966. Historical resources, in the context of the City's regulations, include site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the City. These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These resources are usually over 45 years old, and they may have been altered or are still in use.

Compliance with the Historical Resources Regulations begins with the determination of the need for a site-specific survey for a project. Pursuant to SDMC Section 143.0212(a), a historic property (built environment) survey can be required when obtaining a permit for development of any parcel containing a structure that is over 45 years old and appears to have integrity of setting, design, materials, workmanship, feeling, and association. SDMC Section 143.0212(b) requires that historical resource sensitivity maps be used to identify properties in the City that have a probability of containing historic or pre-historic archaeological sites. These maps are based on records of the California Historical Resources Information System (CHRIS) maintained by the SCIC at San Diego State University. If records show an archaeological site exists on or immediately adjacent to a subject property, the City would require a survey. In general, archaeological surveys are required when the proposed development is on a previously undeveloped parcel, if a known resource is recorded on the parcel or within a one-mile radius, or if a qualified consultant or knowledgeable City staff member recommends it. In both cases, the determination for the need to conduct a site-specific survey must be made in 10 business days for a construction permit or 30 days for a development permit pursuant to SDMC Section 143.0212(c).

SDMC Section 143.0212(d) states that if a property-specific survey is required, it shall be conducted according to the criteria included in the City's Historical Resources Guidelines. Using the survey

results and other available applicable information, the City shall determine whether a historical resource exists, whether it is eligible for designation as a designated historical resource, and precisely where it is located.

### **b. Historical Resources Guidelines**

The City's Historical Resources Guidelines, amended in April 2001, are designed to implement the City's Historical Resources Regulations. If any resources have been recorded on a property, those resources must be evaluated for significance/importance in accordance with the Historical Resources Guidelines. The Historical Resources Guidelines are incorporated in the City's Land Development Manual by reference. The guidelines establish a development review process to review projects in the City. This process is composed of two aspects: the implementation of the Historical Resources Regulations and the determination of impacts and mitigation under CEQA.

### **c. Historical Resources Register**

The City provides a broader set of criteria for eligibility for the City's Historical Resources Register. As stated in the City's Historical Resources Guidelines, "Any improvement, building, structure, sign, interior element and fixture, feature, site, place, district, area, or object may be designated as historic by the City's HRB if it meets any of the following criteria:

- a. Exemplifies or reflects special elements of the City's, a community's, or a neighborhood's historical, archaeological, cultural, social, economic, political, aesthetic, engineering, landscaping, or architectural development;
- b. Is identified with persons or events significant in local, State, or national history;
- c. Embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship;
- d. Is representative of the notable work of a master builder, designer, architect, engineer, landscape architect, interior designer, artist, or craftsman;
- e. Is listed or has been determined eligible by the National Park Service for listing in the National Register of Historic Places or is listed or has been determined eligible by the State Historic Preservation Office (SHPO) for listing in the State Register of Historical Resources; or
- f. Is a finite group of resources related to one another in a clearly distinguishable way or is a geographically definable area or neighborhood containing improvements which have a special character, historical interest, or aesthetic value or which represent one or more architectural periods or styles in the history and development of the City.

### **d. General Plan Historic Preservation Element**

The Historic Preservation Element of the General Plan provides guidance on archaeological and historic site preservation in San Diego, including the roles and responsibilities of the HRB, the status of cultural resource surveys, the Mills Act, conservation easements, and other public preservation incentives and strategies. A discussion of criteria used by the HRB to designate landmarks is included, as is a list of recommended steps to strengthen historic preservation in San Diego. The

Historic Preservation Element sets a series of goals for the City for the preservation of historic resources, and the first of these goals is to preserve significant historical resources. These goals are realized through implementation of policies that encourage the identification and preservation of historical resources.

General Plan policies HP-A.1 through HP-A.5 are associated with the overall identification and preservation of historical resources. This includes policies to provide for comprehensive historic resource planning and integration of such plans within City land use plans. Historic Preservation policies HP-B.1 through HP-B.4 address the benefits of historical preservation planning and the need for incentivizing maintenance, restoration, and rehabilitation of designated historical resources. This is proposed to be completed through a historic preservation sponsorship program and through cultural heritage tourism. Recently adopted community plan updates may also include additional community-specific policies recommended during tribal consultation.

### 4.4.3 Significance Determination Thresholds

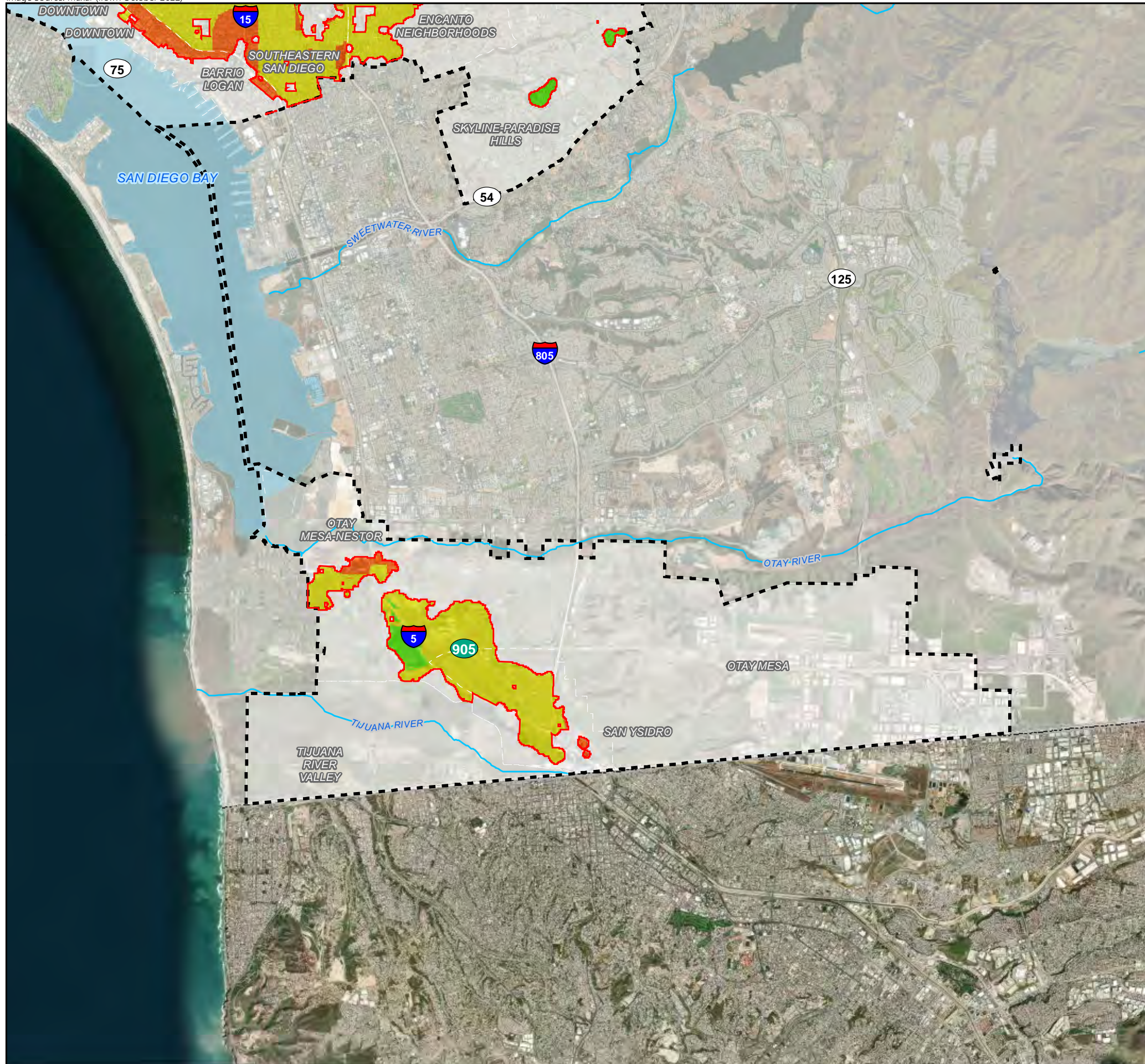
Thresholds used to evaluate potential impacts related to cultural resources are based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:






- 1) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?
- 2) Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?
- 3) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

#### 4.4.3.1 Cultural Resources Sensitivity Maps

As stated above, the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless; however, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within Climate Smart Village Areas. As detailed in the Blueprint SD Initiative Cultural Resources Analysis (see Appendix G), Cultural Resources Sensitivity Maps covering the Blueprint SD Initiative Climate Smart Village Areas, the University CPU area, and the Hillcrest FPA area were developed to identify the sensitivity of an area for containing cultural resources (Figures 4.4-1a through 4.4-1e, 4.4-2 and 4.4-3).





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
- Cultural Resource Sensitivity**
-  High
-  Moderate
-  Low

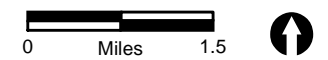
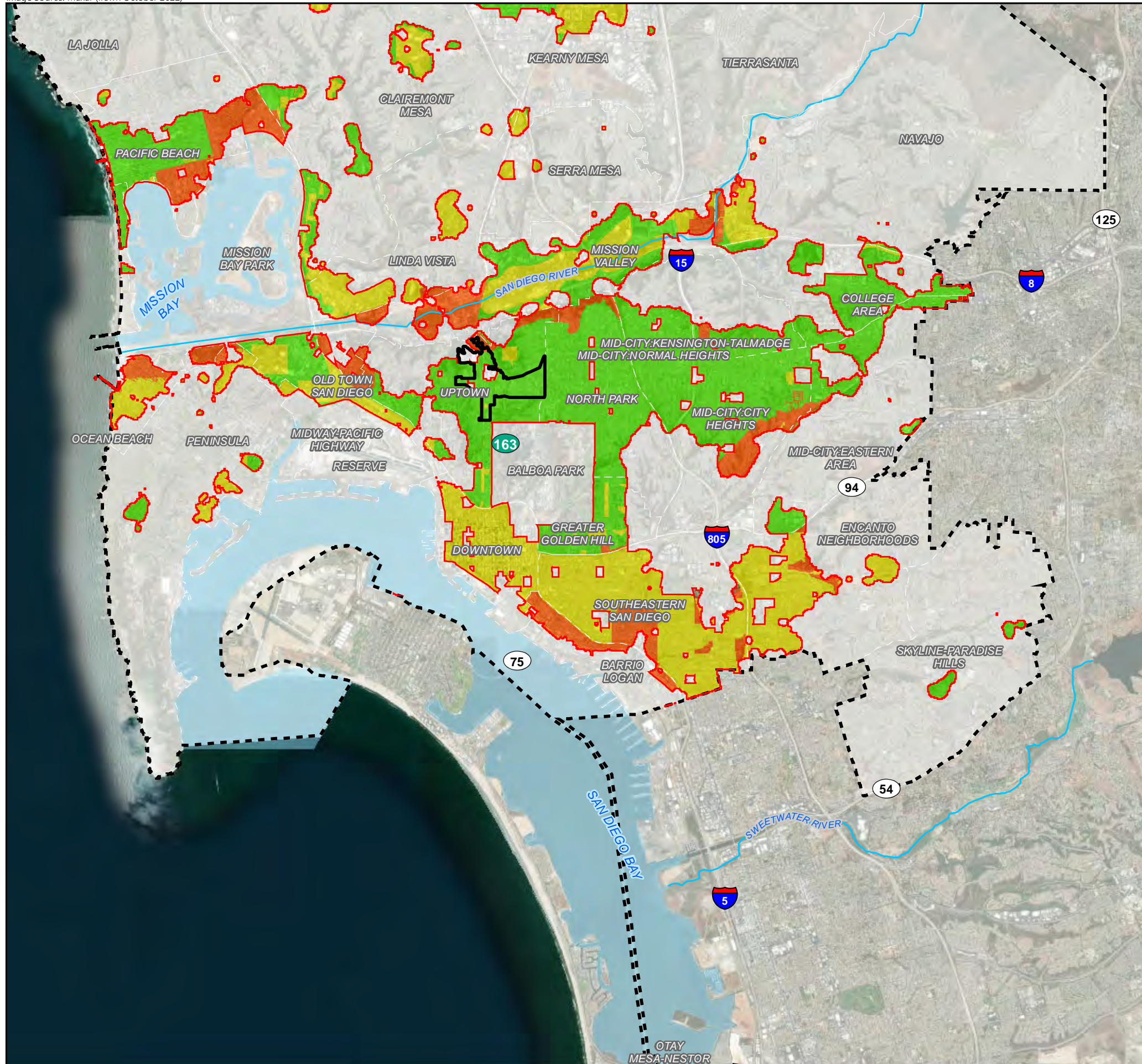


FIGURE 4.4-1a  
Cultural Resource Sensitivity  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South





- Hillcrest Focused Plan Amendment Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Cultural Resource Sensitivity**
- High
- Moderate
- Low

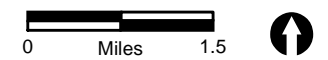
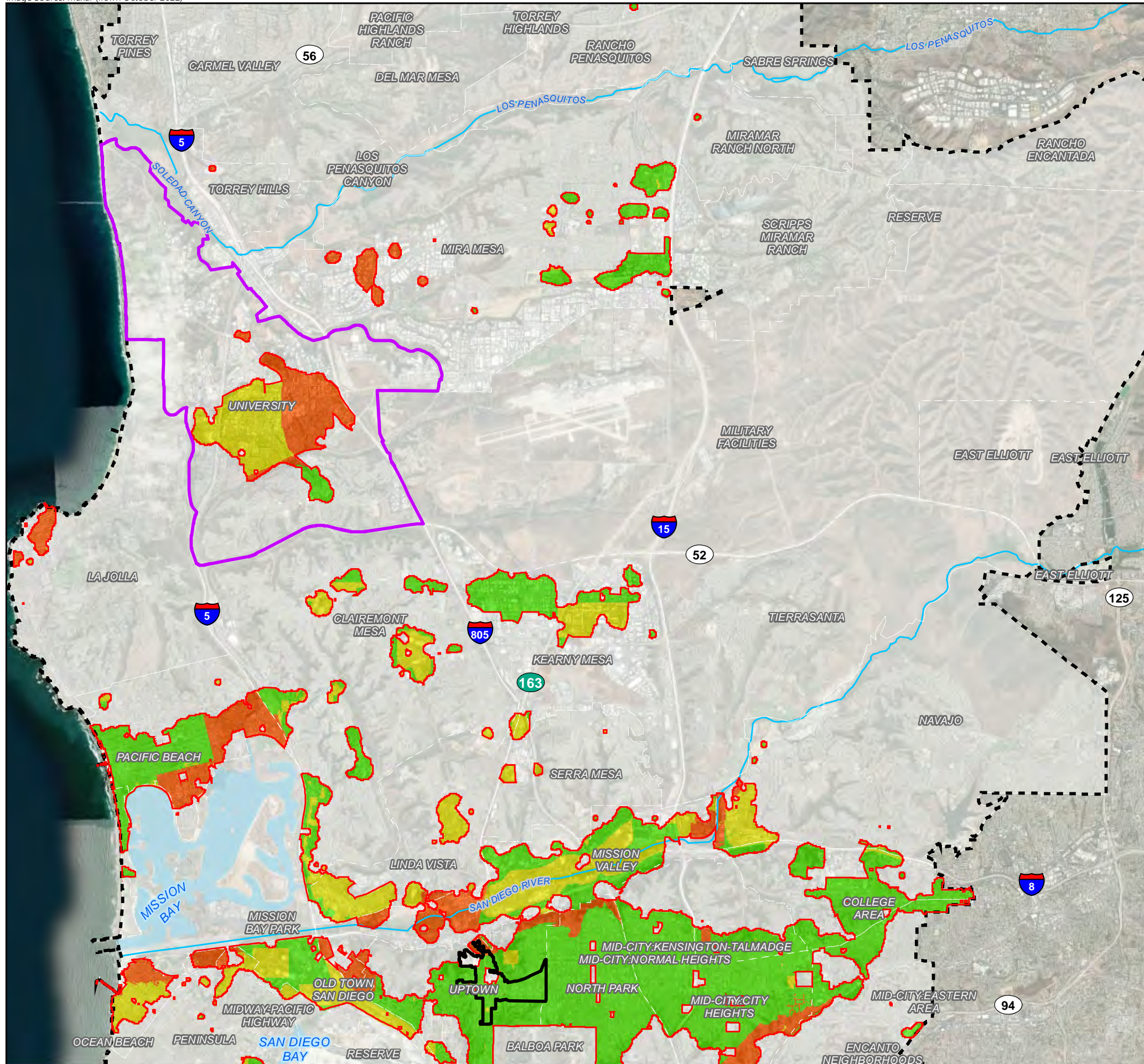


FIGURE 4.4-1b  
Cultural Resource Sensitivity  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South Central





- ▭ Hillcrest Focused Plan Amendment Area
  - ▭ University Community Plan Update Area
  - ▭ Blueprint SD Initiative Climate Smart Village Areas
  - - - San Diego City Limits
- Cultural Resource Sensitivity**
- High
  - Moderate
  - Low

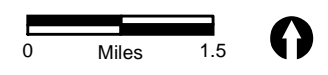
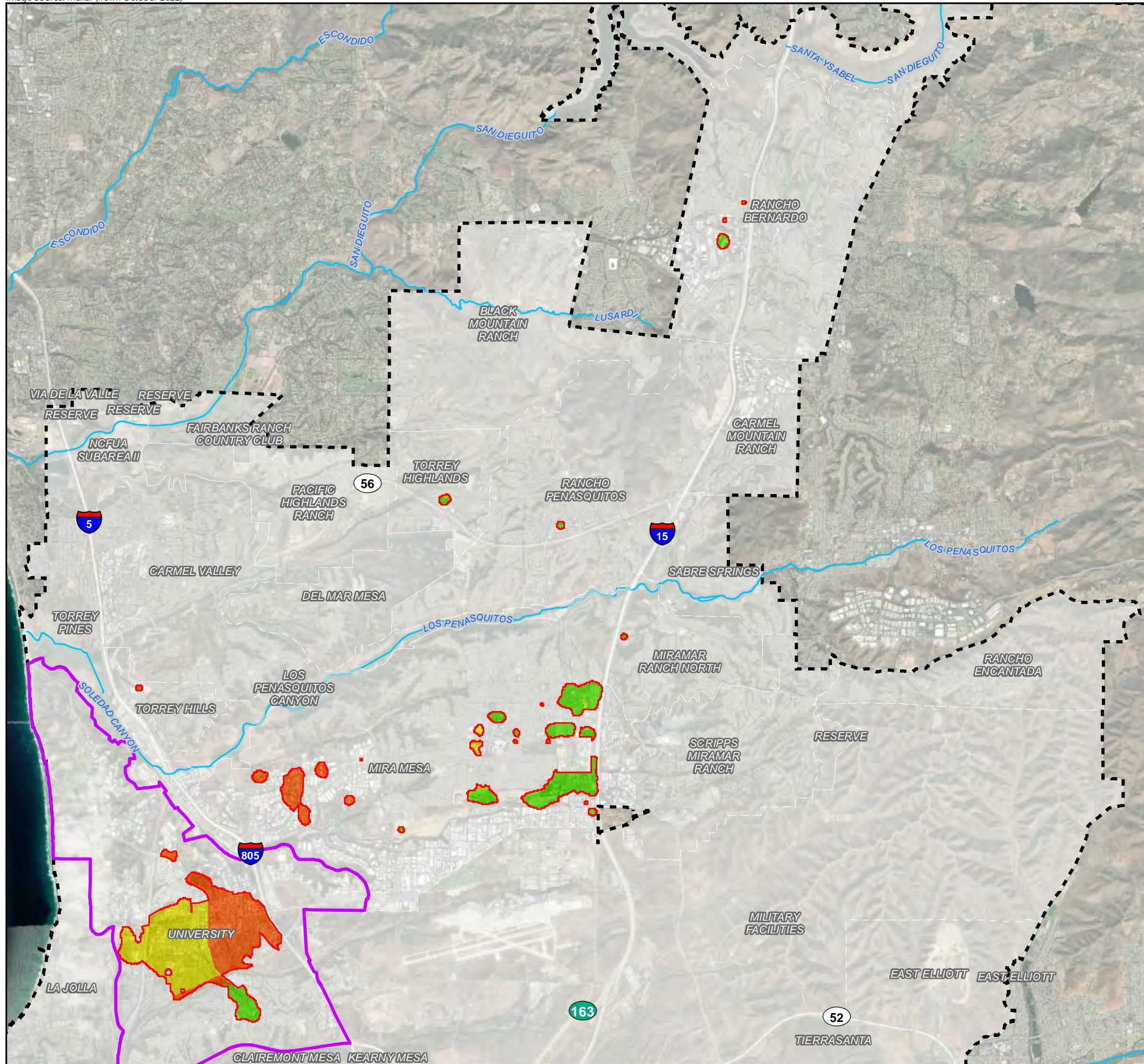








FIGURE 4.4-1c  
Cultural Resource Sensitivity  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
- Cultural Resource Sensitivity**
-  High
-  Moderate
-  Low

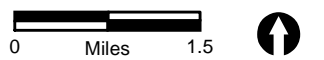
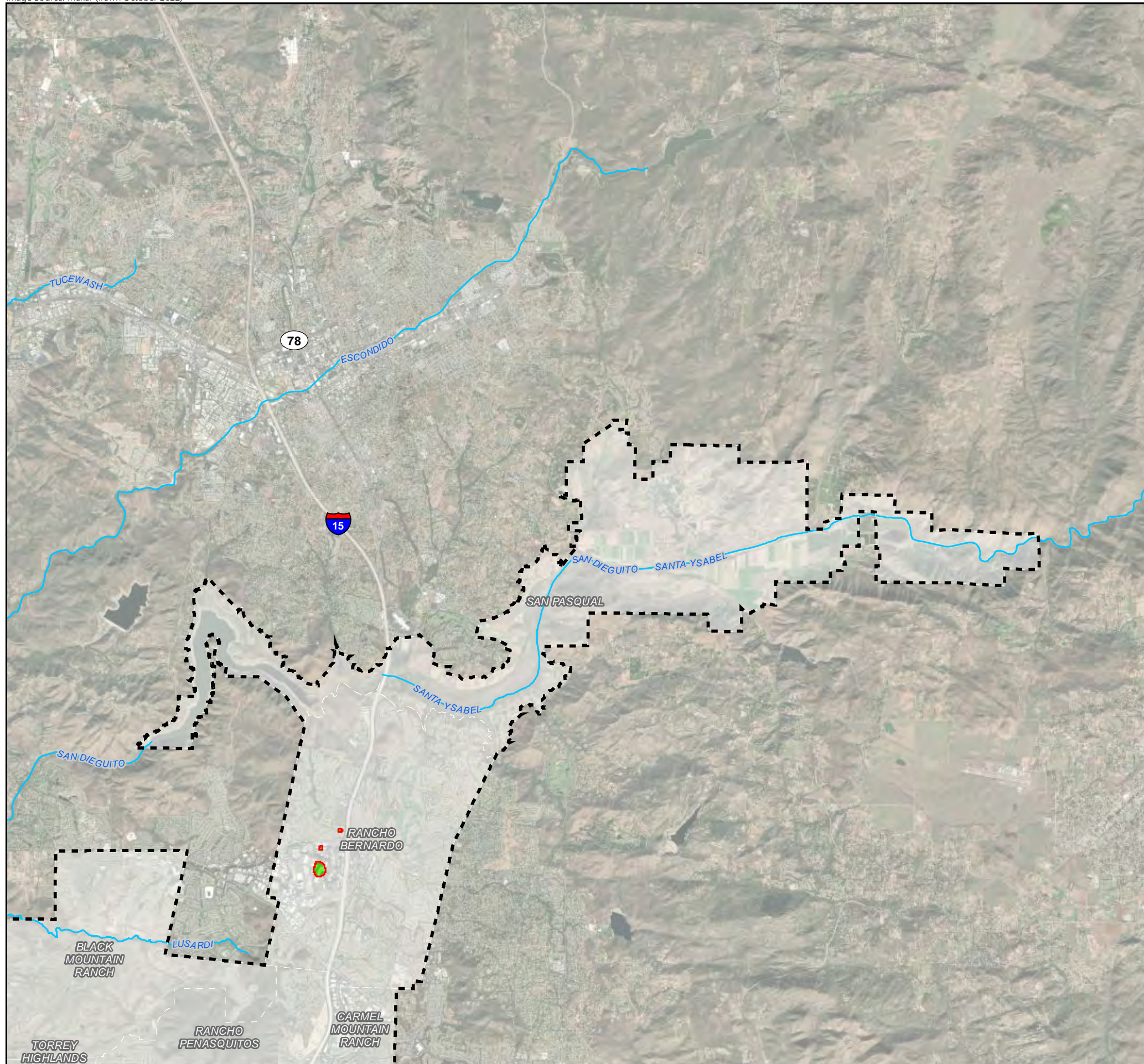


FIGURE 4.4-1d  
Cultural Resource Sensitivity  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North





- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Cultural Resource Sensitivity**
- Low



FIGURE 4.4-1e  
Cultural Resource Sensitivity  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - Northeast



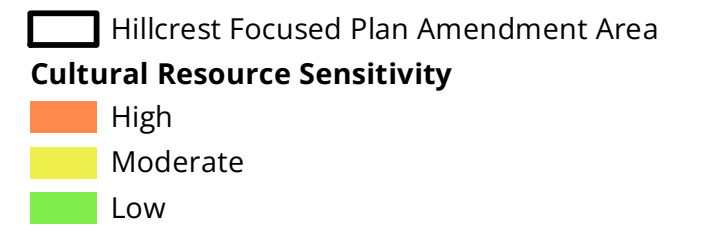
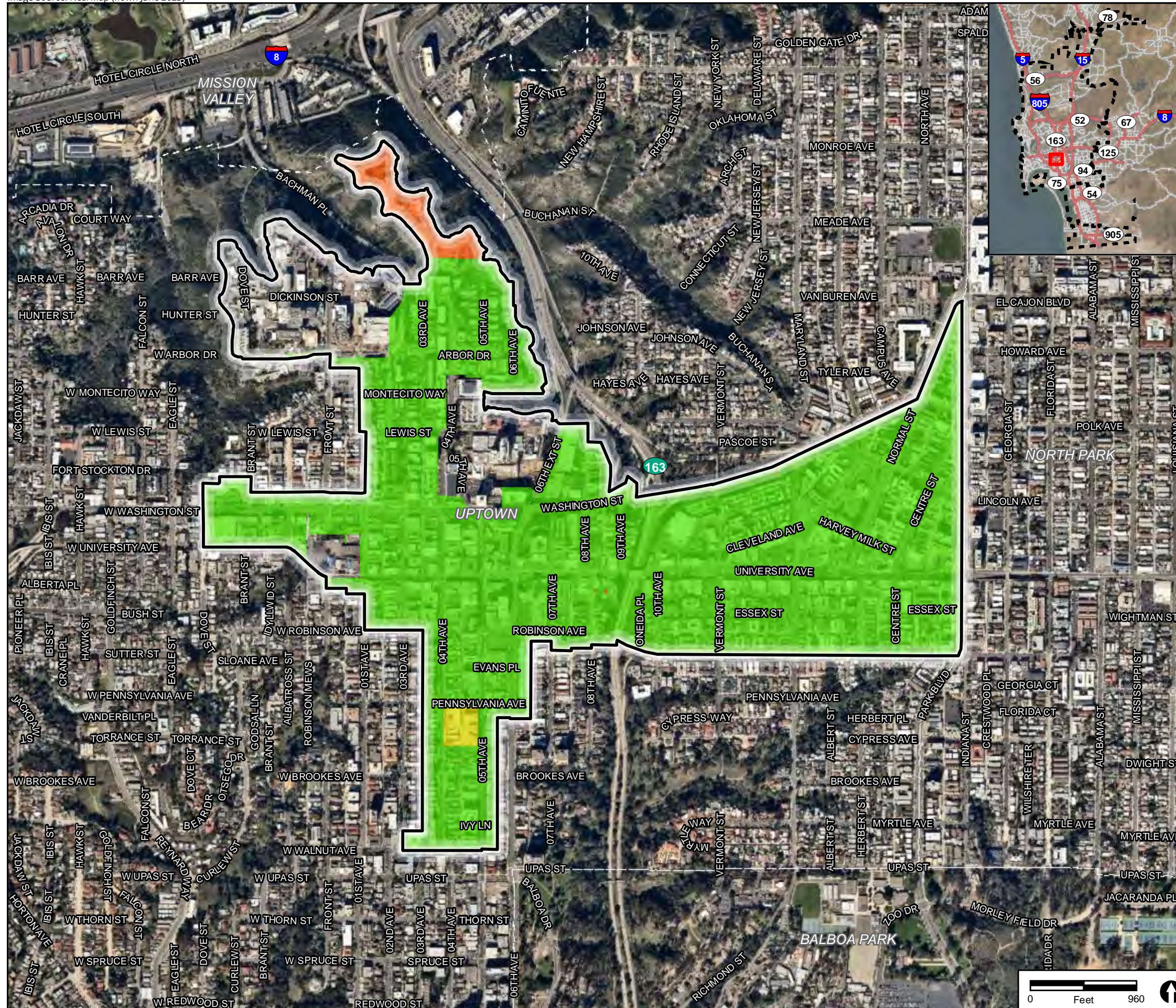
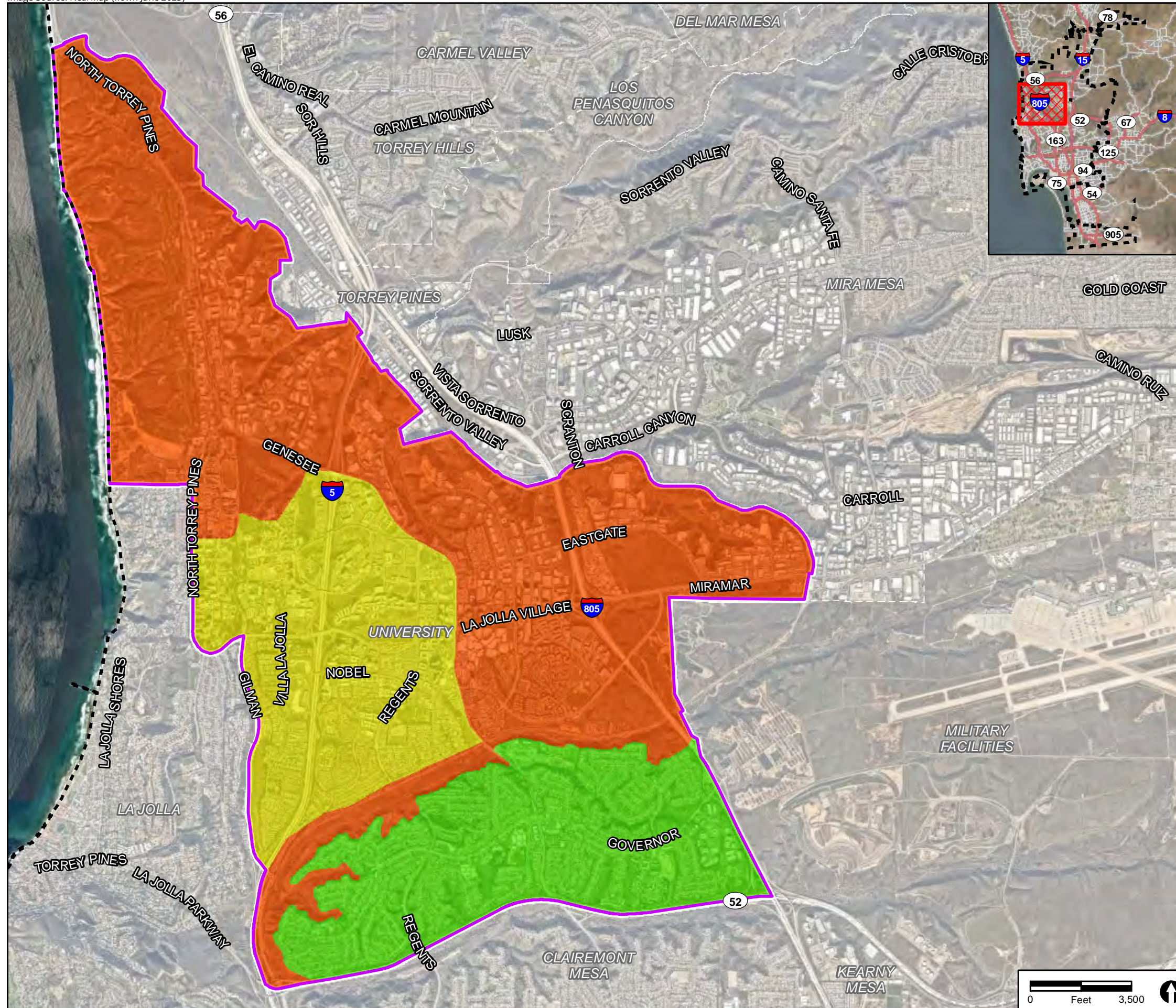


FIGURE 4.4-2  
Cultural Resource Sensitivity  
in Relation to Hillcrest Focused  
Plan Amendment Area





- University Community Plan Update Area
- San Diego City Limits
- Cultural Resource Sensitivity**
  - High
  - Moderate
  - Low

FIGURE 4.4-3  
Cultural Resource Sensitivity  
in Relation to the  
University Community Plan Update Area



would be focused to increase development intensities that support higher density residential and mixed-use development, are located largely within existing developed areas. Project areas include both known historical resources and potentially historical resources. Below ground historic objects or sites are considered archaeological resources and are addressed under Issue 2, below.

Within the Climate Smart Village Areas, Historic Context Statements have been prepared for areas with recently adopted ~~CPUs~~Community Plan Updates. However, for community plan areas without a recent ~~CPU~~community plan update, the location and extent of historical resources has not been comprehensively documented. Historic Context Statements contained within recently updated community plans identify the historical themes and property types important to the development of each community and provide guidance on the identification of significant historical resources on a community basis. In addition, Historic Resource Reconnaissance Surveys completed within individual communities identify the location of potentially significant historic structures. Potential historic districts have been identified in some CPUs in communities with a high likelihood of containing significant historical resources.

Numerous known and potential historical resources have been documented throughout the City and are focused within the City's original neighborhoods such as Old Town, Uptown, Golden Hill, North Park, and the Mid-City communities. For example, the Old Town San Diego Community Plan Area Historic Resources Reconnaissance Survey: Historic Context & Survey Report reported 37 designated historic resources both within and outside of the Old Town San Diego State Historic Park District, one potential historic district, in addition to 21 potential individual resources eligible for local listing (Galvin Preservation Associates, Inc. 2018). The North Park Community Plan Area Historic Resources Survey (Historic Resources Group 2016a) identified six potential historic districts, one multiple property listing, and 47 individual properties that appeared eligible for local designation, including residential (single-family and multi-family), commercial, civic and institutional, and infrastructural properties. The Golden Hill Historic Resources Survey identified one potential historic district, one multiple property listing, and 52 individual properties which appear eligible for local designation (Historic Resources Group 2016b). The Uptown Community Plan Area Historic Resources Survey Report identified 19 potential historic districts, 3 multiple property listings, and 2,266 potentially significant individual resources. In addition, City staff and members of the Uptown community identified four additional potential historic districts including Allen Terrace, Avalon Heights, Hillcrest, and San Diego Normal School/San Diego City Schools Education Complex.

As detailed in Section 4.4.1.5 above, the Historic Context Statement and Reconnaissance Survey prepared for the University CPU identified two historic designated sites in the University CPU area: the Torrey Pines Gliderport site within Torrey Pines City Park (HRB# 315), the Guy and Margaret Fleming House, and an archaeological and cultural resources site (HRB#1450). The Reconnaissance Survey also evaluated 78 residential communities for potential historical significance and identified five (5) residential master planned communities (Tier 1) which were found to warrant further evaluation to determine whether they are eligible for historic designation (Table 4.4-6). Tier 1 communities are required to be associated with a notable developer and/or architect and have one or more of the following characteristics:

- Community appeared to have architectural merit and visual cohesion;
- Integrity of the community was predominately intact;

- Won notable design, architecture, planning or construction award(s) and retain integrity for which the awards were given;
- Unique designs, planning methodologies, or construction methodologies were identified within the community; or
- Archival research suggested that additional research and survey had the potential to uncover additional information pertaining to the historical significance of the neighborhood.

Table 4.4-6 Tier 1 Master Planned Communities		
Map ID #	Master Planned Community	Reason (s) for Future Study
1A	University City West A	Palmer & Krisel-designed single-family homes within one tract
1B	University City West B	Palmer & Krisel-designed single-family homes within one tract
9	University Hyde Park	Palmer & Krisel-designed single-family homes within one tract
14	San Clemente Park Estates	Palmer & Krisel-designed single-family homes within one tract
56, 57, 58, 59, 60, 61, 62, 63, 64, and 65	La Jolla Colony	Master-planned community with varied housing typologies, incorporation of greenspaces, installation of pedestrian pathways, and recreational features such as community swimming pools

The Reconnaissance Survey found that the remaining 65 master-planned communities surveyed (Tier 2 and 3) were determined as unlikely to rise to the level of significance required for designation at the local, state, and national level even with additional study or survey work due to not meeting the factors listed above (Table 4.4-7). Based upon the methods and findings of the Reconnaissance Survey, the 65 master-planned communities identified as Tiers 2 and 3 do not appear to meet the criteria for listing on the local, state, or national registers.

Table 4.4-7 Tiers 2 and 3 Master Planned Residential Communities Proposed for Exemption from Review under SDMC Section 143.0212			
Map ID #	Master Planned Community Name	Tier	Reason(s) for Ineligibility
2	Pennant Village	2	Lacks visual cohesion, unknown architect
3	University Village	2	Heavily altered, unknown architect, lacks visual cohesion
4	University Hills	2	Lacks visual cohesion, heavily altered, no awards or accolades
5	Panorama Park	2	No awards or accolades, no architectural merit, heavily altered
6	Flair	2	Ubiquitous, single-family tract, unknown architect, heavily altered
7	University City Manor	3	Heavily altered tract housing with no notable developer
8	University City Village	2	Ubiquitous multi- and single-family tract, unknown architect
10	Fireside University City Homes	2	Unknown architect, lacks visual cohesion
11	Diamond Manor	3	Heavily altered tract housing with no notable developer
12	The Bluffs	2	Ubiquitous single-family tract, unknown architect, heavily altered
13	University Park North	2	Lacks visual cohesion, ubiquitous single-family housing tract, unknown architect
15	La Jolla Vista	3	Ubiquitous multi-family development and no notable developer

Table 4.4-7 Tiers 2 and 3 Master Planned Residential Communities Proposed for Exemption from Review under SDMC Section 143.0212			
Map ID #	Master Planned Community Name	Tier	Reason(s) for Ineligibility
16	La Jolla Village Apartments	3	Ubiquitous multi-family development and unknown developer
17	Genesee Vista	3	Ubiquitous multi-family development and no notable developer
18	La Jolla Mesa	3	Ubiquitous multi-family development and no notable developer
19	Woodlands North	2	Ubiquitous multi-family housing tract, no awards or accolades
20	Genesee Highlands	2	Ubiquitous multi-family housing tract, unknown architect, lacks visual cohesion
21	SouthPointe	2	Ubiquitous multi-family housing tract, unknown architect
22	Villa Toscana	3	Ubiquitous multi-family development and unknown developer
23	Woodlands La Jolla	2	Ubiquitous multi-family housing tract, no awards or accolades
24	La Jolla Village Tennis Club	3	Ubiquitous multi-family development and no notable developer
25	Eastgate Village	3	Ubiquitous multi-family development and no notable developer
26	La Jolla Terrace	3	Ubiquitous multi-family development and unknown developer
27	West Hills Homes	3	Heavily altered tract housing with no notable developer
28	Pacific Garden Apartments	3	Ubiquitous multi-family development and unknown developer
29	EastBluff	2	Ubiquitous multi-family housing tract, unknown architect
30	Playmor Terrace West	3	Ubiquitous multi-family development and no notable developer
31	Canyon Park Apartments	3	Ubiquitous multi-family development and unknown developer
32	Vista La Jolla	2	Ubiquitous single-family tract, unknown architect
33	Torrey Pines Village Apartments	3	Ubiquitous multi-family development and unknown developer
34	Playmor Terrace	3	Ubiquitous multi-family development and no notable developer
35	Topeka Vale	2	Unknown architect, lacks visual cohesion
36	Woodlands South	2	Ubiquitous multi-family housing tract, no awards or accolades
37	Woodlands West I and II	2	Ubiquitous multi-family housing tract, no awards or accolades
38	La Jolla Park Villas	3	Ubiquitous multi-family development and no notable developer
39	The Park	3	Ubiquitous multi-family development and unknown developer
40	Vista La Jolla Townhomes	2	Ubiquitous multi-family housing tract, unknown architect
41	Diguenos	3	Ubiquitous multi-family development and unknown developer
42	La Jolla Village Park	3	Ubiquitous multi-family development and no notable developer
43	The Pines	3	Ubiquitous multi-family development and no notable developer
44	Villa Mallorca	3	Ubiquitous multi-family development and no notable developer
45	La Jolla Terrace	3	Ubiquitous multi-family development and no notable developer
46	Canyon Ridge	2	Unknown architect, ubiquitous single-family housing tract
47	Boardwalk	2	Ubiquitous multi-family housing tract, no awards or accolades
48	La Jolla Gardens	3	Ubiquitous multi-family development and unknown developer
49	Cambridge	3	Ubiquitous multi-family development and no notable developer
50	La Jolla City Club	3	Ubiquitous multi-family development and no notable developer
51	Villa Europa	3	Ubiquitous multi-family development and no notable developer
52	La Jolla International Gardens	3	Ubiquitous multi-family development and no notable developer



Table 4.4-7 Tiers 2 and 3 Master Planned Residential Communities Proposed for Exemption from Review under SDMC Section 143.0212			
Map ID #	Master Planned Community Name	Tier	Reason(s) for Ineligibility
53	Regency Villas	3	Ubiquitous multi-family development
54	University Towne Square	2	Ubiquitous multi-family development
55	Star Village	3	Heavily altered tract housing with unknown developer
66	Villas at University Park	2	Ubiquitous multi-family housing tract, unknown architect
67	The Venetian	3	Ubiquitous multi-family development and unknown developer
68	La Jolla del Sol	3	Ubiquitous multi-family development and no notable developer
69	Villa Vicenza	3	Ubiquitous multi-family development and unknown developer
70	Cambridge Terrace	3	Ubiquitous multi-family development and unknown developer
71	La Florentine	3	Ubiquitous multi-family development and minimal visibility
72	Avanti	3	Ubiquitous multi-family development and minimal visibility
73	Capri	3	Ubiquitous multi-family development and minimal visibility
74	Casabella	3	Ubiquitous multi-family development and minimal visibility
75	Lucera	3	Ubiquitous multi-family development and minimal visibility
76	Devonshire Woods	3	Ubiquitous multi-family development and unknown developer
77	Pacific Regents	3	Single tower not a master plan and unknown developer
78	Park Place	3	Ubiquitous multi-family development and no notable developer

Land use changes anticipated as a result of implementation of the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA could result in potential impacts to historical resources. The SDMC provides processes for the review of development applications for potential historical significance and the acceptance of nominations of potential historic resources from property owners or the general public for review and possible designation by the HRB for listing on the City's register. SDMC Section 143.0212 requires review of ministerial and discretionary permit applications for projects on parcels that contain buildings 45 years old or older to determine whether the project has the potential to significantly impact a historical resource that may be eligible for listing on the local register. When it is determined that a historical resource may exist and a project would result in a significant impact to that resource, a site-specific survey is required and any additional relevant information (such as staff reports, etc.) regarding the site may be forwarded to the City's HRB to consider designation and listing of the property. If designated, a Site Development Permit with deviation findings and project-specific mitigation would be required for any substantial modification or alteration of the resource.

As part of the University CPU, the Historical Resources Guidelines of the Land Development Manual are proposed to be amended to exempt the 65 residential master planned communities listed in Table 4.4-7 above and identified by the Reconnaissance Survey as Tier 2 and Tier 3 from SDMC Section 143.0212 and the review process for potential historical resources. The "Map ID #" listed in Column 1 in Table 4.4-6 and 4.4-7 corresponds to the map of University Community Plan Area Master-Planned Communities Developed provided in Figure 3-29. The Historical Resources Guidelines of the Land Development Manual provide for the exemption of areas from the requirement for a site-specific survey for the identification of potential historical buildings and

structures, as identified by the HRB. Areas exempted by the HRB are added to the Historical Resources Guidelines. The exemption of these Tier 2 and Tier 3 communities identified in the Reconnaissance Survey is unlikely to result in the loss of potential historical resources given the level of analysis that has occurred as part of the Reconnaissance Survey and data which found that there was nothing to indicate that additional study or research would allow these types of communities to rise to the level of potential significance required to be a Tier 1 community. Additionally, the SDMC allows any member of the public to submit a nomination to designate a property as a historical resource, including properties exempted from review under SDMC Section 143.0212.

As part of the Hillcrest FPA, a new Community Plan Implementation Overlay Zone (CPIOZ)-Type A – Hillcrest Historic District, is proposed within the Hillcrest FPA area. The proposed CPIOZ-Type A includes Supplemental Development Regulations (SDRs) which supplement the City's Historical Resources Regulations and will only apply to development within the proposed Hillcrest Historic District. The City has begun processing of the Hillcrest Historic District, which involves meetings with the property owners and tenants as well as hearings before the Historical Resources Board and its Policy Subcommittee. The designation process is scheduled to conclude shortly after the scheduled adoption of the Hillcrest FPA. The district, which is commercial in nature, was developed at zero-foot front and side yard setbacks, resulting in a development pattern of storefronts set up against the sidewalk and unornamented utilitarian side and rear walls. As a result, character defining features are primarily limited to the front facade. The SDRs are designed to protect the significant historic character defining features—namely the storefronts and the 1-3 story pedestrian scale along the streetscape—while allowing for new development within the district. The proposed SDRs provide design regulations for contributing and non-contributing resources as identified in the Hillcrest Historic District nomination and by the HRB when designated (SDRs-C.1 and C.2), building heights within the CPIOZ area (SDR-C.3), and building stepbacks (SDR-C.4). Future development within the CPIOZ-Type A – Hillcrest Historic District would be required to comply with the SDRs identified in the CPIOZ. Development that complies with these SDRs may be considered a minor alteration under the City's Historical Resources Regulations, and therefore meet the exemption criteria from a Site Development Permit.

Future development within the project areas would be reviewed for compliance with the City's Historical Resources Regulations and in the case of the Hillcrest Historic District, the CPIOZ-Type A – Hillcrest Historic District SDRs.

The General Plan Historic Preservation Element includes policies that guide the City's effort to identify and protect significant historical resources, including policies HP-B.1 through HP-B.4, which address the benefits of historical preservation planning and the need for incentivizing maintenance, restoration, and rehabilitation of designated historical resources. Individual community plans also contain policies addressing historical resources including historic structures and potentially historic neighborhoods. The University CPU includes Policy 6.3A, which directs the City to consider eligible sites for listing on the City's Historical Resources Register and refer sites to the HRB for designation as appropriate; Policy 6.3B, which directs the City to identify and evaluate properties within the University community for potential historic significance, and refer properties found to be potentially eligible to the HRB for designation, as appropriate; and Policy 6.3C, which calls on the City to complete a Reconnaissance Survey of the un-surveyed portions of the community based upon the

University Community Plan Area Historic Context Statement to assist in the identification of potential historic resources, including districts and individually eligible resources.

The Uptown Community Plan includes Policy HP-2.4, which calls for working with members of the community to identify and evaluate additional properties that possess historic significance of social or cultural reasons; Policy HP.2-11, which directs the City to consider eligible for listing on the City's Historical Resources Register any significant archaeological or Native American cultural sites that may be identified as part of future development within Uptown, and refer site to the Historical Resources Board for designation, as appropriate; and Policy HP-3.5, which directs the City to promote the maintenance, restoration, rehabilitation and continued private ownership and utilization of historical resources through existing incentive programs and develop new approaches, such as architectural assistance and relief from setback requirements through a development permit process, as needed. The historic preservation policies of the General Plan and Community Plans are implemented through City initiatives, regulations, and guidelines, most significantly the Historical Resources Regulations of the ~~LD~~ Land Development Code and the Historical Resources Guidelines of the Land Development Manual, which all development is required to comply with.

While future development within the project areas would be reviewed for consistency with historic preservation policies in the General Plan and the applicable Community Plan and would also be required to comply with the SDMC which provides for the regulation and protection of designated and potential historical resources as described above, it is not possible to ensure the successful preservation of all historic built environment resources within the project areas. Future site-specific development and redevelopment that may result from the project could result in the alteration of a historical resource, notwithstanding application of the Historical Resources Regulations and any project-specific mitigation measures. Direct impacts of future site-specific projects may include substantial alteration, relocation, or demolition of historic buildings or structures. Indirect impacts may include the introduction of visual, audible, or atmospheric effects that are out of character with a historic property or alter its setting, when the setting contributes to the resource's significance. Thus, potential impacts to individual historical resources could occur where implementation of the project would result in increased development potential and would result in a significant impact to historic buildings, structures, or sites.

## Issue 2 Archaeological Resources

*Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?*

Although there is very little undeveloped land or previously undisturbed soils within the project areas, future site-specific development and related construction activities at the project-level facilitated by the project could result in the alteration or destruction of prehistoric or historic archaeological resources, objects, or sites and could impact religious or sacred uses, or disturb human remains, particularly within proximity to areas where there are known, recorded archaeological resources. Direct impacts may include substantial alteration or demolition of archaeological sites from grading, excavation, or other ground-disturbing activities. Indirect impacts may include the potential for vandalism or destruction of an archaeological resource.

While cultural sensitivity varies across the City, there is a potential that cultural resources would be impacted as a result of future development anticipated under the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA, especially within areas that have been categorized as moderate or high sensitivity. Future site-specific development within areas with moderate and high sensitivity that could disturb native soils would have the potential to impact significant resources. High sensitivity areas include archaeological resources that have been determined significant by past test excavations or were assumed significant based on their site attributes.

As detailed in Figures 4.4-1a through 4.4-1e, high sensitivity areas within the Climate Smart Village Areas include areas mapped within the Encanto Neighborhoods, Mission Valley, and Old Town community planning areas; Tecolote and San Clemente canyons in the Clairemont Mesa community planning area, the canyon areas within the Mira Mesa, Pacific Highlands Ranch, and Carmel Valley community planning areas; and the base of these canyon areas leading into the Mission Valley and Los Chollas Valley areas from the Uptown and Golden Hill community planning areas. Within the southern portion of the City, due to the extensive use of the Otay Mesa and adjacent river valleys by prehistoric people, areas identified as high sensitivity include the Tijuana and Otay River valleys and areas within the Otay Mesa community planning area where hundreds of previously recorded sites have been documented and/or undeveloped land that has not been previously surveyed.

Moderate sensitivity areas within the Climate Smart Village Areas include Mission Valley, where the highly active depositional San Diego River valley is present, creating the potential for intact cultural resources to be buried, and the communities of Southeastern San Diego and Encanto Neighborhoods, where multiple high-potential water courses are present, and numerous previously recorded resources have been observed in a buried context during ground-disturbing construction activities throughout the area. In addition, the majority of the developed areas of the Otay Mesa-Nestor and San Ysidro community planning areas contain a moderate sensitivity ranking due to being situated within areas characterized by the floodplains for both the Tijuana and Otay rivers where buried cultural resources are possible. Low sensitivity areas within the Climate Smart Village Areas include areas within the City that have been excavated by mass or rough grading within the last approximately 40 years.

As detailed in Figure 4.4-3, portions of the University CPU area have been identified as having a high sensitivity for containing cultural resources. High sensitivity areas include Rose Canyon in the southern portion of the plan area. The records search results have identified a high concentration of archaeological sites in the northern and eastern portions of the University CPU area, including ethnohistoric and prehistoric village sites located adjacent to the University CPU area, and sites along the coast dating to the Early and Middle Holocene, or the high potential for sites.

An area in the center of the University CPU area, south and west of Genesee Avenue, west of Interstate (I-) 805, east of Gilman Drive, and north of Rose Canyon has been identified as having a moderate sensitivity for cultural resources. This area contains a moderate number of previously recorded cultural resources. The remaining portions of the University CPU area are identified as having a low sensitivity for cultural resources. Although numerous cultural resources studies have taken place within the low sensitivity areas, no significant cultural resources have been previously identified.

Figure 4.4-2 identifies the sensitivity levels of the Hillcrest FPA area. Most of the Hillcrest FPA area is identified as low sensitivity, due to the high amount of development that has occurred in the area. However, the northern portion of the FPA area, south of I-8, is classified as high sensitivity. This section is mostly undeveloped and in proximity to the San Diego River; therefore, there is a high possibility of identifying significant cultural resources.

In order to minimize the potential to impact important historic and prehistoric archaeological objects or sites that may be buried within the project areas, the City implements the Historical Resources Regulations (SDMC Section 143.0212) when obtaining a permit for development, and the Cultural Resources Sensitivity Maps are reviewed to identify areas that have a likelihood of containing archaeological sites. The Cultural Resources Sensitivity Maps described in Section 4.4.3.1 above, and graphically represented in Figures 4.4-1 through 4.4-3 were developed as part of the project to ensure all project areas have a sensitivity rating that would be checked during a future project review. Upon submittal of future site-specific permit applications, the project area would be reviewed against the Cultural Resources Sensitivity Maps, specifically to determine whether the project has the potential to adversely impact an archaeological resource that may be eligible for individual listing in the local register (SDMC Section 143.0212(d)). This review is supplemented with a project-specific records search of the CHRIS data and NAHC Sacred Lands File by qualified staff, after which a site-specific archaeological survey may be required, when applicable, in accordance with the City's regulations and guidelines. Should the archaeological survey identify potentially significant archaeological resources, mitigation measures would be required to avoid or minimize adverse impacts to the resource consistent with the Historical Resources Guidelines. In the event site-specific surveys are required as part of the ministerial review process, adherence to the Historical Resources Regulations and Guidelines would ensure that appropriate measures are applied to the protection of historical resources consistent with City requirements. Such requirements may include archaeological and Native American monitoring, avoidance and preservation of resources, data recovery and repatriation or curation of artifacts, among other requirements detailed in the Historical Resources Guidelines. Additionally, future discretionary development in the University CPU area would be reviewed for consistency with policy 5.11(E) which encourages development to be carefully sited and designed to avoid adverse impacts to archeological and paleontological resources to the maximum extent feasible.

While existing state and local regulations would provide for the regulation and protection of prehistoric and historic archaeological resources, sacred sites, and human remains, it is not possible to ensure the successful preservation of all archaeological resources where new development may occur. Thus, potential impacts to prehistoric and historic archaeological resources, and sacred sites would be significant.

### Issue 3 Human Remains

*Would the project disturb any human remains, including those interred outside of dedicated cemeteries?*

Although there is little undeveloped land or previously undisturbed soils within the project areas, future development and related construction activities facilitated by the project could disturb human remains, particularly within proximity to areas where there are known, recorded

archaeological resources. Future development within areas with moderate and high sensitivity that could disturb native soils could have the potential to encounter human remains.

As detailed above, the City implements the Historical Resources Regulations (SDMC Section 143.0212) during permit review which requires the City to review Cultural Resources Sensitivity Maps to identify properties that have a likelihood of containing archaeological sites. Sites with archaeological resource potential could also contain human remains. This review is supplemented with a project-specific records search of the CHRIS data and NAHC Sacred Lands File by qualified staff, after which a site-specific archaeological survey may be required, when applicable, in accordance with the City's regulations and guidelines. Should the site have the potential for impacting human remains, measures would be recommended including archaeological and Native American monitoring during ground disturbance activities.

Additionally, Section 7050.5 of the California H&SC requires that in the event human remains are discovered during construction or excavation, all activities must be stopped in the vicinity of discovered human remains until the coroner can determine whether the remains are those of a Native American. If determined to be Native American, the coroner must contact the NAHC. The California H&SC provides a process and requirements for the identification and repatriation of collections of human remains or cultural items. Specifically, H&SC Section 8010-8030, otherwise known as CalNAGPRA, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process. CalNAGPRA applies repatriation policy found in 25 United States Code Section 3001-3013, also known as NAGPRA. The act conveys to Native Americans of demonstrated lineal descent the human remains, including the funerary or religious items, that are held by federal agencies and federally supported museums, or that have been recovered from federal lands. NAGPRA makes the sale or purchase of Native American remains illegal, whether or not they were derived from federal or Native American lands.

With required compliance with local, state, and federal regulations regarding the treatment of human remains, impacts to human remains would be less than significant.

## **Cumulative Impacts**

The City's Historical Resources Regulations and Historical Resources Guidelines, combined with federal, state, and local regulations, provide a regulatory framework for ensuring project-level historical and archaeological resources are evaluated and mitigation measures or standard conditions are applied during project-level reviews. The City's process for evaluating discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan and applicable Community Plan. As future development within the City may contribute to incremental historical and archaeological resource impacts, and the degree of future impacts and the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the cumulative impact on historical and archaeological resources would be considered significant.

Future development or redevelopment in the City and throughout the county would result in incremental impacts to the historical record in the San Diego region. Regardless of the efforts taken to avoid impacts to cultural resources, the more land that is converted to developed uses, the greater the potential for impacts to cultural resources. While the ~~proposed~~ project has the potential to impact historical and archaeological resources, many of the project areas are located within existing developed and urban locations that have been subject to some degree of ground disturbance. This characteristic of the project areas would limit the potential for significant, previously undiscovered resources to be encountered, but does not eliminate the possibility for further impacts. While individual projects can avoid or mitigate the direct loss of a specific resource, the effects would be cumulatively considerable, and therefore ~~would~~ result in a cumulatively significant impact.

Adherence to local, state, and federal regulations regarding the treatment of human remains would ensure that potential cumulative impacts to human remains would be less than significant.

## 4.4.5 Significance of Impacts

### 4.4.5.1 Historic Structures, Objects or Sites

While the SDMC provides for the regulation and protection of designated and potential historical resources, ensuring mitigation is implemented to reduce impacts to the maximum extent practicable, at a program level of review it is not possible to ensure the successful preservation of all historic built environment resources, objects, and sites within the project areas. Thus, at a program level of review, potential impacts to historical resources would be ~~considered~~ significant.

### 4.4.5.2 Archaeological Resources

While existing regulations and the SDMC would provide for the regulation and protection of archaeological resources, it is impossible to ensure the successful preservation of all archaeological resources. Therefore, potential impacts to archaeological resources would be ~~considered~~ significant.

### 4.4.5.3 Human Remains

The California H&SC provides a process and requirements for the identification and repatriation of collections of human remains or cultural items. With implementation of local, state, and federal regulations, impacts to human remains would be less than significant.

## 4.4.6 Mitigation, Monitoring and Reporting

Mitigation measures are provided at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific discretionary and ministerial projects are proposed. The mitigation measures refer to City regulations and plans that have incorporated detailed performance standards and are fully enforceable through permit conditions or other legally binding instruments, consistent with CEQA Guidelines Section 15126.4(a)(2). The referenced plans, policies, or regulations in the mitigation measures described in this section. ~~The~~



following mitigation framework provides a program-level framework for reducing significant impacts related to cultural resources. As the City's Historic Resources Regulations apply to both ministerial and discretionary projects, the requirements detailed in MM-HIST-1 apply to both ministerial and discretionary projects.

#### 4.4.6.1 Historic Structures, Objects, or Sites

##### MM-HIST-1 Historic Resources

Future projects that could directly and/or indirectly affect a historical building, historical structure, or historical object as defined in the City's Historical Resources Regulations and Historical Resources Guidelines shall comply with the City's Historical Resources Guidelines and Historical Resources Regulations (SDMC Sections 143.0201–143.0280) and shall be required to implement avoidance, minimization, and mitigation measures in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines.

#### 4.4.6.2 Archaeological Resources

##### MM-HIST-2 Archaeological and Tribal Cultural Resources

Prior to the issuance of any discretionary permit for a future development project that could directly and/or indirectly affect a cultural resource (i.e., archaeological and Tribal Cultural Resources), the City shall require the following steps be taken to determine (1) the potential presence and/or absence of cultural resources, and (2) the appropriate mitigation for any significant resources that may be impacted. For the purposes of CEQA review, a cultural resource is defined in CEQA Guidelines Section 15064.5. Tribal Cultural Resources are defined in PRC Section 21074.

##### Initial Determination

The City's Environmental Designee shall determine the potential presence and/or absence of cultural resources at the project site by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, the California Historical Resources Inventory System, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit. A review of the cultural resources sensitivity map (see Figures 4.4-1a through 4.4-1e) shall be done at the initial planning stage of a project to ensure that cultural resources are avoided and/or impacts are minimized to the extent feasible in accordance with the City's Historical Resources Guidelines. The sensitivity levels described below shall guide the appropriate steps necessary to address the potential resources. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted cultural resources, as well as new data available to the City.

**High Sensitivity:** Indicates locations where significant cultural resources have been documented or would have the potential to be identified. High sensitivity resources include village and habitation sites and areas near fresh water sources. These resources may range from moderately complex to highly complex, with more defined living areas or specialized work space areas, and a large breadth of features and artifact assemblages. The potential for identification of additional resources in such areas would be high.

**Moderate Sensitivity:** Indicates that some cultural resources have been recorded within the area or the area was developed before 1984 when CEQA review may not have been applied. Moderate sensitivity resources consist of diversity or density of feature and artifact types (e.g., a moderately dense lithic scatter).

**Low Sensitivity:** Indicates areas where there is a high level of disturbance or development, and few or no previously recorded cultural resources are present based on records search results and due to the timing of development of the project site occurring after 1984 when CEQA would have been applied. Within these areas, the potential for additional resources to be identified would be low.

### **Phase I**

Based on the results of the initial determination, if there is any evidence that the project area contains archaeological and/or Tribal Cultural Resources, a site-specific records search and/or survey may be required and shall be determined on a case-by-case basis by the City's Environmental Designee. If a cultural resources study is required, it shall be prepared consistent with the City's Historical Resources Guidelines. All individuals conducting any phase of the cultural resources program shall meet the professional qualifications in accordance with the City's Historical Resources Guidelines. The cultural resources study shall include the background research conducted as part of the initial determination. This includes a record search at the SCIC at San Diego State University. A review of the Sacred Lands File maintained by the NAHC shall also be conducted at this time. The cultural resources study shall include a field survey and/or an evaluation of significance, as applicable if cultural resources are identified, based on the City's Historical Resources Guidelines. Native American participation shall be required for all field work.

### **Phase II**

Once a cultural resource (as defined in the PRC) has been identified, a significance determination shall be made. If a project were to impact areas identified as low sensitivity, it is assumed that any significant cultural resources no longer hold integrity or are not present. If a project impacts these areas, no additional mitigation measures shall be required.

If a project were to impact areas identified as moderate sensitivity, a site-specific records search and/or survey may be required on a case-by-case basis. If cultural resources are identified in the records search and/or survey, a significance evaluation for the identified cultural resources shall be required. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action shall be required. Resources found to be non-significant as a result of a survey and/or assessment shall require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation site forms and inclusion of the results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation indicate there is still a potential for resources to be present in portions of the property, then mitigation monitoring shall be required. If the resource has not been evaluated for significance, a testing plan shall be required. If the resource is determined to be significant, a testing plan, data recovery plan, and mitigation monitoring shall be required.

If a project were to impact areas identified as high sensitivity, a survey and testing program may be required by the qualified archaeologist to further define resource boundaries subsurface presence

or absence and determine the level of significance. A thorough discussion of testing methodologies including surface and subsurface investigations can be found in the City's Historical Resources Guidelines. The results from the testing program shall be evaluated against the Significance Thresholds found in the City's Historical Resources Guidelines. If significant cultural resources are identified within the area of potential effects, the site may be eligible for local designation.

Preferred mitigation for direct and/or indirect impacts to cultural resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. Mitigation measures such as, but not limited to, a Research Design and Archaeological Data Recovery Program (ADRP), construction monitoring, site designation, capping, granting of deeds, designation of open space, and avoidance and/or preservation shall be required and shall be determined by the City's Environmental Designee on a case-by-case basis.

### **Phase III**

#### *Archaeological Data Recovery Program*

If a cultural resource is found to be significant and preservation is not an option, a Research Design and ARDP shall be required, which includes a Collections Management Plan for review and approval by the City's Environmental Designee. The ADRP shall be based on a written research design and is subject to the provisions as outlined in PRC Section 21083.2. The ADRP shall be reviewed and approved by the City's Environmental Designee prior to distribution of a draft CEQA document.

#### *Local Designation of Resources*

The final cultural resource evaluation report shall be submitted to ~~Historical Resources Board (HRB)~~ staff for designation. The final cultural resource evaluation report and supporting documentation will be used by HRB staff in consultation with qualified City staff to ensure that adequate information is available to demonstrate eligibility for designation under the applicable criteria.

#### *Monitoring and Archaeological Resource Reports*

Archaeological monitoring may be required during building demolition and/or construction grading when significant cultural resources are known or suspected to be present on a site but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development, dense vegetation, or if a data recovery did not reduce the impact to the resource. Monitoring shall be documented in a consultant site visit record.

Native American participation shall be required for all subsurface investigations, including geotechnical testing and other ground disturbing activities whenever a Tribal Cultural Resource or any archaeological site. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of PRC Section 5097 shall be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the PRC (Section 5097.98) and State ~~H&S Health and Safety Code~~ (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions shall be outlined in the Mitigation Monitoring and Reporting Program included in a subsequent project-specific environmental document. The Most Likely Descendent shall be

consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources.

Archaeological Resource Reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the City's Historical Resources Guidelines. In the event that a cultural resource deposit is encountered during construction monitoring, a Collections Management Plan shall be required in accordance with the project's Mitigation Monitoring and Reporting Program. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by State (i.e., AB 2641 [Coto] and NAGPRA of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., federal NAGPRA United States Code 3001-3013) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation, as identified by the ~~NAHC~~ Native American Heritage Commission.

Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, 36 CFR 60 ~~Title 36 of the Code of Federal Regulations Part~~. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

### **4.4.6.3 Human Remains**

Impacts to human remains would be less than significant, no mitigation is required.

## **4.4.7 Significance after Mitigation**

### **4.4.7.1 Historic Structures, Objects, or Sites**

With implementation of MM-HIST-1, future development, redevelopment, and related activities facilitated by the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would be required to implement SDMC regulations for protection of designated and potential historical resources. Despite application of the City's Historic Resources Regulations with MM-HIST-1, it is not possible to ensure the successful preservation of all historic built environment resources within the project areas at a programmatic level. Furthermore, pursuant to SDMC Section 143.0260, a potential deviation from the City's Historical Resources Regulations may be considered if a proposed development cannot to the maximum extent feasible comply with the regulations so long as the decision maker makes the applicable findings in SDMC Section 126.0504. Thus, potential impacts to historical resources from the built environment would remain significant.

### **4.4.7.2 Archaeological Resources**

With implementation of MM-HIST-2, future development, redevelopment, and related construction activities facilitated by the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would require compliance with the City's Historical Resources Regulations (SDMC Section 143.0212). City review of all permit applications for any parcel identified as sensitive on the Cultural Resources Sensitivity Maps would ensure application of MM-HIST-2 when appropriate. However, even with implementation of MM-HIST-2, the feasibility and efficacy of mitigation measures cannot be determined at this program level of analysis. Thus, potential impacts to prehistoric and historic archaeological resources would remain significant.

### **4.4.7.3 Human Remains**

Impacts to human remains would be less than significant with the application of state and local regulations; therefore, no mitigation is required.

## 4.5 Energy

This section evaluates potential impacts related to energy conservation due to implementation of the key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (CPU) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

The energy conservation analysis consists of a summary of the existing conditions in the project areas, the energy regulatory framework, a discussion of the project’s potential impacts on energy resources, and identification of applicable regulatory and/or policy requirements that may reduce energy consumption.

### 4.5.1 Existing Conditions

San Diego Gas and Electric (SDG&E) currently provides natural gas and electricity transmission and distribution infrastructure in San Diego County. SDG&E is regulated by the California Public Utilities Commission (CPUC), which is responsible for making sure that California utilities’ customers have safe and reliable utility service. The project’s energy needs would be supplied through the various combinations of energy resources available, and the analysis in this section takes into account the anticipated future SDG&E energy resource use patterns.

Senate Bill (SB) 1078 established the California Renewables Portfolio Standard (RPS) Program, which requires SDG&E and other statewide energy utility providers to achieve a 33 percent renewable energy mix by 2020. In 2018, SB 100 was signed into law, which increased the RPS to 60 percent by 2030 and requires all the state’s electricity to come from carbon-free resources by 2045 (CPUC 2024). Table 4.5-1 summarizes the SDG&E power mix as of 2021. As shown, SDG&E used biomass and biowaste, solar, and wind sources, and obtained approximately 44.5 percent of its energy from renewable resources in 2021 (SDG&E 2021).

Energy Source	Power Mix (%)
Renewables	44.5
<i>Biomass and Biowaste</i>	0.9
<i>Solar</i>	28.5
<i>Wind</i>	15.2
Large Hydroelectric	1.8
Natural Gas	29.6
Nuclear	0.2
Unspecified Power <sup>1</sup>	23.9
<b>Total</b>	<b>100</b>
SOURCE: SDG&E 2021	
<sup>1</sup> Unspecified power is electricity that has been purchased through open market transactions and is not traceable to a specific generation source.	

## 4.5.2 Regulatory Setting

### 4.5.2.1 Federal Regulations

#### a. Federal Energy Policy and Conservation Act and Amendments

The Energy Policy and Conservation Act was enacted in 1975. It established a number of federal programs that play a key role in reducing energy use, most notably the Corporate Average Fuel Economy (CAFE) standards and the Energy Conservation Program for Consumer Products. The Energy Conservation Program for Consumer Products sets energy efficiency standards for certain types of appliances, including air conditioners, refrigerators, water heaters, clothes washers, and dishwashers.

#### b. Corporate Average Fuel Economy Standards

The CAFE standards determine the fuel efficiency of certain vehicle classes in the U.S. The first phase of the program applied to passenger cars, new light-duty trucks, and medium-duty passenger cars with model years 2012 through 2016 and required these vehicles to achieve a standard equivalent to 35.5 miles per gallon (mpg). The second phase of the program applies to passenger cars, new light-duty trucks, and medium-duty passenger cars with model years 2017 through 2025 and increases the standards to 54.5 miles per gallonmpg.

Separate standards were also established for medium- and heavy-duty vehicles. The first phase applied to model years 2014 through 2018 and the second phase applies to model years 2018 through 2027.



### **c. Energy Independence and Security Act of 2007**

The Energy Independence and Security Act was enacted in 2007 and contains four key titles to promote energy efficiency and renewable energy generation. Titles 1 and 2 increase the federal CAFE standards, promote renewable energy use in vehicles, and create incentive programs for hybrid vehicles. Title 3 strengthens energy efficiency standards for various appliances and light bulbs, including requiring the phasing out of outdated and inefficient incandescent light bulbs. Title 4 promotes energy efficiency in buildings by establishing several educational and incentive programs.

#### **4.5.2.2 State Regulations**

##### **a. California Energy Efficiency Action Plan**

In September 2008, the CPUC adopted the Long Term Energy Efficiency Strategic Plan, which established the first integrated framework of goals and strategies for saving energy, covering government, utility, and private sector actions. Assembly Bill (AB) 758 subsequently established a requirement for regular updates to the plan in 2010, and SB 350 identified a plan goal in 2015 of achieving a doubling of statewide energy efficiency savings in electricity and natural gas final end uses of retail customers by January 1, 2030 (relative to the 2015 base year). Since 2008, the plan has been implemented through focused action plans such as the Zero Net Energy Commercial Building Action Plan in June 2011, the Research and Technology Action Plan in August 2013, the Lighting Action Plan in November 2013, the Codes and Standards Action Plan in March 2014, and the New Residential Zero Net Energy Action Plan in June 2015.

The first comprehensive update to the plan, the 2019 California Energy Efficiency Action Plan, was adopted in November 2019 (California Energy Commission [CEC] 2019). In response to new direction from the state legislature, the focus of the new plan has been expanded. Rather than being focused on traditional end-use energy efficiency, the new plan also includes measures aimed at building decarbonization.

##### **b. Sustainable Communities Strategy**

SB 375, the 2008 Sustainable Communities and Climate Protection Act, provides for a new planning process that coordinates land use planning, regional transportation plans, and funding priorities to help California meet the greenhouse gas (GHG) reduction goals established in AB 32. SB 375 requires Regional Transportation Plans developed by metropolitan planning organizations to incorporate a Sustainable Communities Strategy in their plans. The goal of the Sustainable Communities Strategy is to reduce regional vehicle miles traveled (VMT) through land use planning and consequent transportation patterns. SB 375 also includes provisions for streamlined California Environmental Quality Act (CEQA) review for some infill projects, such as transit-oriented development.

### **c. SB 1078 (Renewables Portfolio Standard Program)**

The RPS program promotes diversification of the state's electricity supply and decreased reliance on fossil fuel energy sources. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020 (referred to as the "Initial RPS"), the goal has been accelerated and increased by Executive Orders (EOs) S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, SB 2 (1X) codified California's 33 percent RPS goal. In September 2015, the California Legislature passed SB 350, which increases California's renewable energy mix goal to 50 percent by year 2030. In 2018, SB 100 was signed into law, which increased the RPS to 60 percent by 2030 and requires all the state's electricity to come from carbon-free resources by 2045 (CPUC 2024).

### **d. California Code of Regulations, Title 24 – California Building Code**

The California Code of Regulations (CCR) Title 24, is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction including, but not limited to, plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility. Of particular relevance to energy conservation are the ~~CBC~~ California Building Code's energy efficiency and green building standards as outlined below.

#### ***Title 24, Part 6 – Energy Efficiency Standards***

Title 24, Part 6 of the CCR is the California Energy Efficiency Standards for Residential and Nonresidential Buildings (also known as the California Energy Code [Energy Code]). This code, originally enacted in 1978 in response to legislative mandates, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated approximately every three years to incorporate and consider new energy efficiency technologies and methodologies as they become available, and incentives in the form of rebates and tax breaks are provided on a sliding scale for buildings achieving energy efficiency above the minimum standards.

The current version of the Energy Code, known as Title 24 or the 2022 Energy Code, became effective on January 1, 2023. The 2022 Energy Code encourages efficient electric heat pumps, establishes electric-ready requirements for new homes, expands solar photovoltaic and battery storage standards, strengthens ventilation standards, and more. The Energy Code is conceptually divided into three basic sets. First, there is a basic set of mandatory requirements that apply to all buildings. Second, there is a set of performance standards—the energy budgets—that vary by climate zone (of which there are 16 in California) and building type; thus, the Energy Code is tailored to local conditions and provides flexibility in how energy efficiency in buildings can be achieved. Finally, the third set constitutes an alternative to the performance standards, which is a set of prescriptive packages that provide a recipe or a checklist compliance approach.

#### ***Title 24, Part 11 – California Green Building Standards Code***

Title 24, Part 11 of the CCR is the California Green Building Standards Code (CALGreen). Beginning in 2011, CALGreen instituted mandatory minimum environmental performance standards for all ground-up new construction of commercial and low-rise residential buildings, state-owned

buildings, schools, and hospitals. It also includes voluntary tiers (I and II) with stricter environmental performance standards for residential and non-residential buildings. Local jurisdictions must enforce the minimum mandatory requirements and may adopt CALGreen with amendments for stricter requirements.

The mandatory standards require the following:

- 20 percent reduction in indoor water use relative to specified baseline levels;
- 50 percent construction/demolition waste diverted from landfills;
- Inspections of energy systems to ensure optimal working efficiency;
- Low pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards;
- Dedicated circuitry to facilitate installation of electric vehicle charging stations in newly constructed attached garages for single-family and duplex dwellings; and
- Installation of electric vehicle charging stations for at least three percent of the parking spaces for all new multi-family developments with 17 or more units.

## **e. California Energy Plan**

The CEC is responsible for preparing the California Energy Plan, which identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The plan calls for the state to assist in the transformation of the transportation system to improve air quality, reduce congestion, and increase the efficient use of fuel supplies with the fewest environmental and energy costs. To further this policy, the plan identifies a number of strategies, including providing assistance to public agencies and fleet operators.

### **4.5.2.3 Local Regulations**

#### **a. San Diego Association of Governments 2009 San Diego Regional Energy Strategy**

The Regional Energy Strategy establishes goals for the San Diego region to be more energy efficient, increase the use of renewable energy sources, and enhance the region's energy infrastructure in order to meet the growing energy demand. The Regional Energy Strategy serves as an energy policy guide to support decision-making by the San Diego Association of Governments and its member agencies as the region strives to meet the energy needs of a growing population, housing stock, and workforce while maintaining and enhancing regional quality of life and economic stability.

#### **b. SDG&E Long-Term Procurement Plan**

As required by the CPUC, utility companies such as SDG&E must prepare Long-Term Procurement Plans (LTTPs) to ensure that adequate energy supplies are available to maintain a reserve margin of 15 percent above the estimated energy demand. These plans outline future energy needs and how

those needs can be met. In December 2006, SDG&E filed its LTPP with the CPUC, which included a 10-year energy resource plan that details its expected portfolio of energy resources over the period of 2007 through 2016. The projections included in the current LTPP were based on the CEC's California Energy Demand 2008-2018 Forecast, dated November 2007. The 2016-2026 CEC California Energy Demand projections are now lower than what was anticipated in 2007.

### c. City of San Diego General Plan

The General Plan's Conservation Element includes policies that address energy conservation throughout the City and in the project areas. These policies address sustainable development, sustainable building design, waste diversion, renewable energy use, and energy efficiency, generation, and conservation, among other topics. Policies in the Conservation Element, including proposed updated policies, include, but are not limited to, the following:

- CE-A.5: Employ sustainable or "green" building techniques for the construction and operation of buildings.
- CE-A.8: Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-I.2, or by renovating or adding on to existing buildings, rather than constructing new buildings.
- CE-I.4: Maintain and promote water conservation and waste diversion programs to conserve energy.
- CE-I.5: Support the installation of photovoltaic panels, and other forms of renewable energy production.
- CE-I.8: Improve fuel-efficiency to reduce consumption of fossil fuels.
- CE-I.9: Implement local and regional transportation policies that improve mobility and increase energy efficiency and conservation.
- CE-I.10: Use renewable energy sources to generate energy to the extent feasible.
- CE-I.11: Collaborate with others to develop incentives to increase the use of renewable energy sources or reduce use of non-renewable energy sources.

### d. Uptown Community Plan

The Uptown Community Plan contains the following energy policies specific to the Uptown Community Planning area, including the Hillcrest FPA area. These existing and proposed updated policies include, but are not limited to, the following:

- UD-4.576: Incorporate building features that allow natural ventilation, maximize daylight, reduce water consumption, and minimize solar heat gain.
- UD-4.587: Incorporate features that provide shade, passive cooling, and reduce daytime heat gain.
- UD-4.624: Incorporate elements to use renewable energy such as small low-impact wind turbines or photo-voltaic panels on flat roofs that are discretely located to limit any visibility from the street or glare to adjacent properties.
- CE-1.3: Employ sustainable building techniques for the construction and operation of buildings, which could include solar photovoltaic and energy storage installations, electric vehicle charging stations, plumbing for future solar water heating, or other measures.

- CE-1.4: Provide and/or retrofit street lighting and outdoor lighting that is energy efficient, to contribute to meeting the City's energy efficiency goals outlined in the Climate Action Plan (CAP).

## e. University Community Plan Update

The University CPU contains the following energy policies specific to the CPU area. These policies include, but are not limited to, the following:

- 5.14A: Support a sustainable and efficient land use pattern and mobility system that reduces automobile trips and greenhouse gas emissions and promotes safe pedestrian and bicycle transportation and mass transit.
- 5.14B: Encourage sustainable design that reduces greenhouse gas emissions and dependency on non-renewable energy sources, makes efficient use of resources, and incorporates sustainable landscaping, water use, and storm-water management.
- 5.14C: Utilize sustainable design that reduces emissions, pollution, and dependency on non-renewable energy sources, makes efficient use of local resources, and incorporates sustainable landscaping, water use, and storm-water management.
- 5.15A: Reduce energy consumption by requiring energy efficiency in building design and landscaping and by planning for a self-contained community and energy-efficient transportation.
- 5.15B: Maximize opportunities for active and passive heating and cooling through site design by means of appropriate building orientation, solar access and landscaping.
- 5.15C: Include compensating measures as part of proposed development if there will be impacts to solar energy systems off-site.
- 5.15D: Incorporate measures to increase energy-efficient forms of transportation for commercial and industrial developments. Supply bicycle racks, showers, priority parking for carpools, bus stops with support facilities, charging stations for electric vehicles, and other incentives.

## f. Climate Action Plan

The City's 2022 CAP builds on the 2015 CAP and establishes a citywide goal of net zero GHG emissions by 2035, committing the City to an accelerated trajectory for GHG reductions and making the City more sustainable and healthier for residents. The primary purposes of the CAP are to provide a roadmap for the City to achieve GHG reductions, conform the City's climate change efforts to California laws and regulations, promote climate equity, implement climate change actions from the General Plan, and provide CEQA tiering for the GHG emissions of new development.

In August 2022, the City Council adopted an update to the CAP which included amendments to the LDC to adopt the CAP Consistency Regulations (San Diego Municipal Code, Section 143.1401 et seq.). The CAP Consistency Regulations apply to the following ministerial and discretionary projects: 1) residential development that results in three or more total dwelling units on all premises in the

development; 2) non-residential development that adds more than 1,000 square feet and results in 5,000 square feet or more of total gross floor area, excluding unoccupied spaces such as mechanical equipment and storage areas; and 3) parking facilities as a primary use. The CAP also meets the criteria for a qualified GHG emissions reduction plan for use in cumulative impact analysis for development projects under CEQA Guidelines Section 15183.5. The CAP Consistency Regulations contain measures that are required to be implemented on a project-by-project basis to ensure that the specified GHG emissions targets identified in the CAP are achieved. Implementation of these measures would further ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Projects for new development that are consistent with the CAP, as determined through compliance with the CAP and the CAP Consistency Regulations, may rely on the CAP for the cumulative impacts analysis of GHG emissions.

### 4.5.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to energy are based on applicable criteria in CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?
- 2) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

### 4.5.4 Impact Analysis

#### Issue 1 Energy Resources

*Would the project result in a potentially significant environmental impact due to the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?*

#### a. Construction-Related Energy Consumption

Energy resources would be consumed during construction of future development associated with the project. Energy use would occur in two general categories: fuel use from vehicles used by workers commuting to and from the construction site, and fuel use by vehicles and other equipment to conduct construction activities. At this program level of analysis, it is too speculative to quantify the construction-related energy consumption of future development, either in total or by fuel type. Although the exact details of the projects that could be implemented in accordance with the project are not known at this time, there are no known conditions in the Blueprint SD Initiative project area, including the Climate Smart Village Areas, in the Hillcrest FPA area, or in the University CPU area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, development implemented in accordance with the

project would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects. Impacts would be less than significant.

## **b. Transportation Energy Use**

Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would facilitate development of higher density and intensity of land uses around transit and employment centers within the Hillcrest FPA and University CPU areas, and would focus increases in development intensities within the Climate Smart Village Areas, which are areas that have good access to homes, jobs and mixed-use destinations and which encourage walking/rolling, biking and transit usage compared to driving. Development in these areas would support the City's CAP and associated energy reduction goals, primarily through reductions in vehicle trips. Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would increase opportunities for homes and jobs near transit to—among other objectives—encourage a mode shift from single occupancy vehicles to active transportation and transit use. The Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would support a more energy efficient land use and transportation system. Nonetheless, future development would use transportation energy associated with both construction and project operations. Trips by individuals traveling to and from future development are anticipated to occur in passenger vehicles or public transit. Passenger vehicles would be mostly powered by gasoline, with some fueled by diesel or electricity. Public transit would be powered by diesel or natural gas and could potentially be fueled by electricity.

The Blueprint SD Initiative, the Hillcrest FPA, and the University CPU provide a land use and policy framework that encourages the development of higher-density residential and mixed-use development in areas that would have the greatest VMT efficiency and thus the lowest energy expenditures. Therefore, long-term implementation of the project would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of energy. Impacts would be less than significant.

## **c. Operational Energy Use**

Future development facilitated by the implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would support higher densities and intensities within appropriate locations in the Hillcrest FPA area, University CPU area, and Climate Smart Village Areas. Higher density development is more energy efficient than lower density, single-family residential development because multi-family units are generally smaller than single-family units, resulting in less energy (electricity and natural gas) consumption. By concentrating planned residential densities in appropriate locations with access to transit, future growth would be both VMT and energy efficient. While future growth would require energy use, it would not represent a wasteful or inefficient use of energy.

As new development is constructed, new or renovated buildings would use electricity and natural gas to run various appliances and equipment, including space and water heaters, air conditioners, ventilation equipment, lights, and numerous other devices. Generally, electricity use is higher in the warmer months due to increased air conditioning needs, and natural gas use is highest when the weather is colder as a result of high heating demand. Future projects facilitated by the Blueprint SD



Initiative, the Hillcrest FPA, and the University CPU would be required to meet the mandatory energy requirements of CALGreen (Title 24, Part 11 of the CCR) and the Energy Code (Title 24, Part 6 of the CCR) in effect at the time of issuance of a building permit. Adherence to the mandatory energy requirements would reduce future operational impacts in regard to energy resources. ~~Future development would also be required to comply with the CEC Building Electrification policy, which requires new residential and commercial buildings to eliminate the use of natural gas, increase energy efficiency, increase distributed energy generation and storage, and increase electric vehicle charging stations.~~ There are no features of the project that would result in the wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

## Issue 2 Conflicts with Plans or Policies

*Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Future development implemented under the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU, at a minimum, would be required to meet the mandatory energy requirements of CALGreen (Title 24, Part 11 of the CCR) and the Energy Code (Title 24, Part 6 of the CCR) in effect at the time of development and would benefit from the efficiencies associated with these regulations as they relate to building heating, ventilating, and air conditioning mechanical systems, water heating systems, and lighting. Additionally, rebate and incentive programs that promote the installation and use of energy-efficient plug-in appliances and lighting would be available as incentives for future development. Adherence to mandatory energy requirements and regulations would help to meet targeted energy goals, ~~and. As noted above, future development would also be required to comply with the Building Electrification policy as part of the CEC's amendments to the state building code, which take a significant step toward removing natural gas in new construction.~~ The implementation of this policy would also support the goals of the CAP regarding renewable energy and energy efficiency. Additionally, the Blueprint SD Initiative, Hillcrest FPA, and University CPU include robust policy frameworks that support the development of a sustainable and efficient land use pattern and mobility system, encourage sustainable design that is energy efficient, and promote renewable energy use (see Sections 4.5.2.3 c, d and e above). Adherence to the existing regulatory and policy framework would ensure the project would not conflict with any state or local plan for renewable energy or energy efficiency. Refer to Section 4.7 of this PEIR for a discussion of the project's consistency with the City's CAP. Therefore, impacts would be less than significant.

## Cumulative Impacts

Future development resulting from implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU could contribute to cumulative impacts related to energy. However, all future development facilitated by the project would be subject to existing building and energy code regulations in place at the time of development. Other regulations that affect energy consumption described in Section 4.5.2 would continue to be implemented over time. As the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would support a more energy-efficient land use pattern that promotes transit use, it would not contribute to a cumulative impact related to energy. Thus, cumulative impacts would be less than significant.

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## 4.5.5 Significance of Impacts

### 4.5.5.1 Energy Resources

Construction of development facilitated by the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would not result in the use of excessive amounts of fuel or other forms of energy and impacts would be less than significant.

Long-term implementation of the project would not create a land use pattern that would result in a wasteful, inefficient, or unnecessary use of energy as it would place development in areas with good access to transit and would encourage alternative transportation use. Impacts would be less than significant.

Future development facilitated by the implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would not result in the wasteful, inefficient, or unnecessary consumption of energy resources during operations as new development would be required to meet the mandatory energy requirements of CALGreen and the Energy Code. Impacts would be less than significant.

### 4.5.5.2 Conflicts with Plans or Policies

Future projects would be subject to existing building and energy code regulations in place at the time they are implemented. Additionally, the Blueprint SD Initiative, Hillcrest FPA, and University CPU include robust policy frameworks which support the development of a sustainable and efficient land use pattern and mobility system, encourage sustainable design that is energy efficient, and promote renewable energy use. Development facilitated by the implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would not conflict with any state or local plan for renewable energy or energy efficiency. Impacts would be less than significant.

## 4.5.6 Mitigation, Monitoring and Reporting

### 4.5.6.1 Energy Resources

Impacts would be less than significant; therefore, no mitigation is necessary.

### 4.5.6.2 Conflicts with Plans or Policies

Impacts would be less than significant; therefore, no mitigation is necessary.

## 4.6 Geology and Soils

This section analyzes the potential for significant impacts as it relates to geology and soils that could result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (~~CPU~~) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

The geologic conditions and analysis in this section are based on the City’s Seismic Safety Study (City of San Diego 2008), relevant geological maps published by the State of California, and the U.S. Geologic Survey. The information in this section is also based on the Desktop Geotechnical and Geologic Hazard Evaluation for the University Community Plan Update prepared by The Bodhi Group, Inc. (Appendix E) and the Uptown Community Plan Update Program Environmental Impact Report (PEIR; State Clearinghouse Number 2016061023) Geotechnical Report prepared by GEOCON Inc., dated June 10, 2015, which is hereby incorporated by reference.

### 4.6.1 Existing Conditions

#### 4.6.1.1 Geologic Conditions

##### a. Blueprint SD Initiative

San Diego is located within the western (coastal) portion of the Peninsular Ranges Geomorphic Province of California. The Peninsular Ranges encompass an area that roughly extends from the Transverse Ranges and the Los Angeles Basin, south to the United States–Mexico border, and beyond another approximately 800 miles to the tip of Baja California, Mexico. The geomorphic province varies in width from approximately 30 to 100 miles, most of which is characterized by northwest-trending mountain ranges separated by subparallel fault zones. In general, the Peninsular Ranges are underlain by Jurassic-age metavolcanic and metasedimentary rocks and by Cretaceous-age igneous rocks of the southern California batholith. Geologic cover over the basement rocks in the westernmost portion of the province in San Diego County generally consists of Upper Cretaceous-, Tertiary-, and Quaternary-age sedimentary rocks (City of San Diego 2007).

The Blueprint SD Initiative’s policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide; however, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas. Therefore, potential impacts associated with

implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The distribution of geologic units in relation to the Climate Smart Village Areas is shown on Figures 4.6-1a through 4.6-1e.

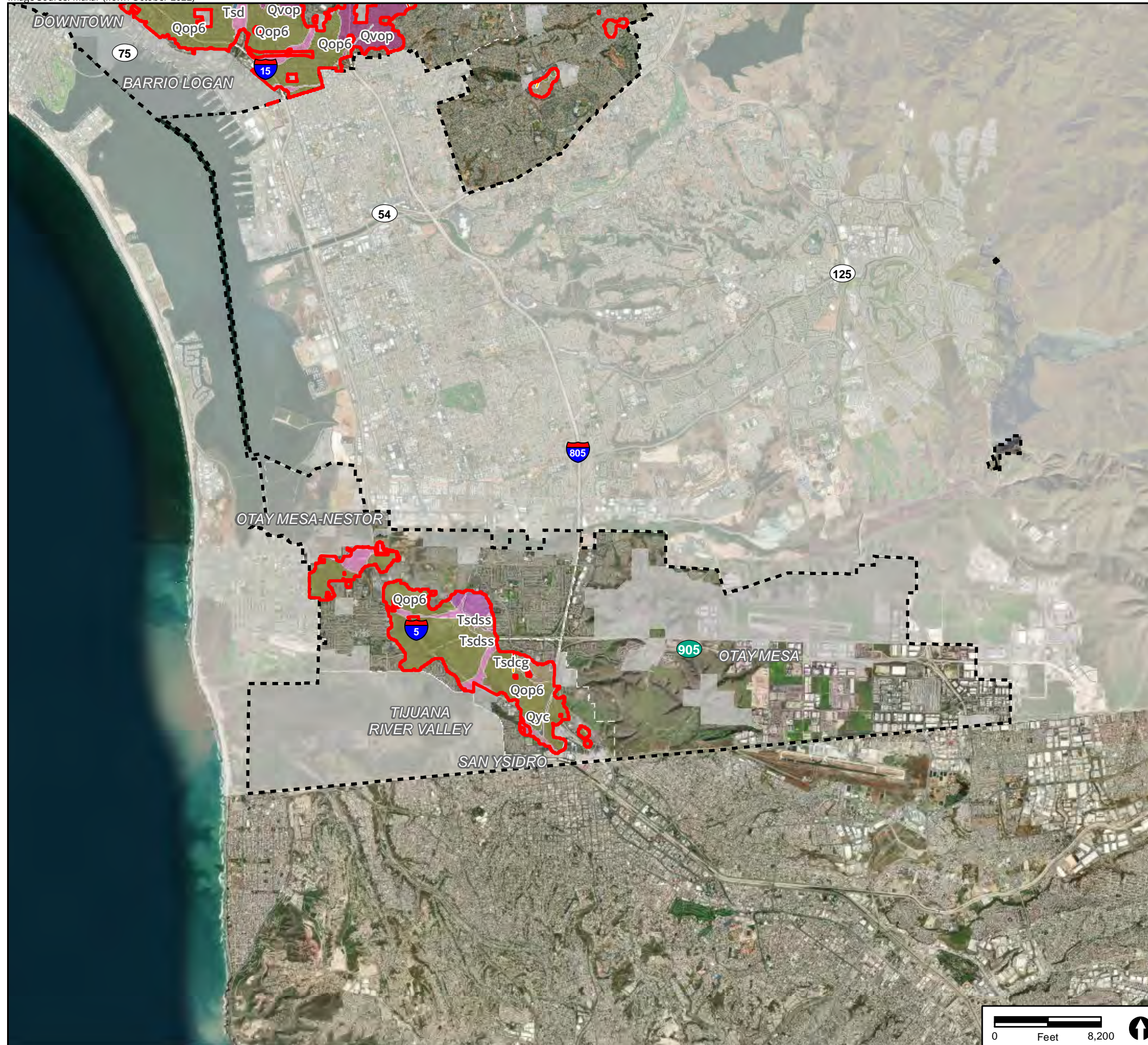
A description of the geologic formations in the City can be found in the Geologic Map of the San Diego 30' x 60' Quadrangle, California (Kennedy and Tan 2008).

## **b. University Community Plan Update**

As detailed in the Desktop Geotechnical and Geologic Hazard Evaluation prepared by The Bodhi Group, Inc. (see Appendix E), the University CPU area consists of artificial fill (both documented and undocumented), young alluvium, estuarine deposits, landslide deposits, Old paralic deposits, very old paralic deposits, and formational materials of the Scripps Formation, Ardath Shale, Torrey Sandstone, and Del Mar Formation. The distribution of geologic units is shown on Figure 4.6-2 and descriptions of the geologic formations within the University CPU area are detailed below:

- Af – Artificial fill (late Holocene). Although there are no mapped limits of artificial fill, manmade fill underlies large portions of the University CPU area. Most areas underlain by fill are associated with the construction of buildings or infrastructure. Many fills were constructed in the 1950s and 1960s when compaction standards were not as stringent as current standards. These fills may be subject to settlement under new buildings or additional fill loads. Fills placed in 1980 or more recently are likely compacted to current standards and less likely to settle under new loads.
- Qya – Young alluvial deposits (Holocene and late Pleistocene). Young alluvial deposits are characterized as poorly consolidated, poorly sorted, permeable canyon deposits of sandy, silty, or clay-bearing alluvium. These deposits occur in the bottoms of the major canyons in the University CPU area: Rose Canyon, San Clemente Canyon, and Sorrento Valley. Young alluvial deposits may settle under structural or additional fill loads. Compacted fill overlying settlement prone young alluvial deposits may settle under new building or additional fill loads.
- Qpe – Modern surficial deposits (late Holocene). Unconsolidated estuarine deposits composed of fine-grained sand and clay. The estuarine deposits are found along the base of the slopes on the west side of Sorrento Valley.
- Qls – Landslide deposits (late Pleistocene to Holocene). Landslide deposits are mapped in the slopes and tributaries to Rose Canyon and San Clemente Canyon, the slopes and tributary canyons bordering the west side of Sorrento Valley, and along the coastal bluffs. The landslides appear related to weak, slide-prone formations (Scripps Formation, Ardath Shale, and Delmar Formation) and faulted areas in combination with steep natural slopes.
- Qop 2-4 – Old paralic deposits, Units 2-4 undivided (late to middle Pleistocene). The old paralic deposits are moderately permeable, reddish-brown, interfingered strandline, beach, estuarine, and colluvial deposits composed of siltstone, sandstone, and conglomerate. The paralic deposits are difficult to separate into individual units as they merge and interfinger with one another. The deposits are poorly to moderately consolidated. The Unit 2-4 deposits are located in the northern most portion of the University CPU area.





- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Exclusion Area

**Fault Zone**

- Fault
- Concealed Zone
- Inferred Fault

**Geology**

- Qls | Landslide deposits, undivided
- Qop6 | Old paralic deposits, Unit 6
- Qvop | Very old paralic deposits, undivided
- Qya | Young alluvial flood-plain deposits
- Qyc | Young colluvial deposits
- Tmv | Mission Valley Formation, marine and nonmarine sandstone
- To | Otay Formation, arkosic sandstone
- Tsd | San Diego Formation, undivided
- Tsdcg | San Diego Formation, pebble and cobble conglomerate
- Tsdss | San Diego Formation, fossiliferous marine sandstone
- af | Artificial fill

FIGURE 4.6-1a  
Regional Geology in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South



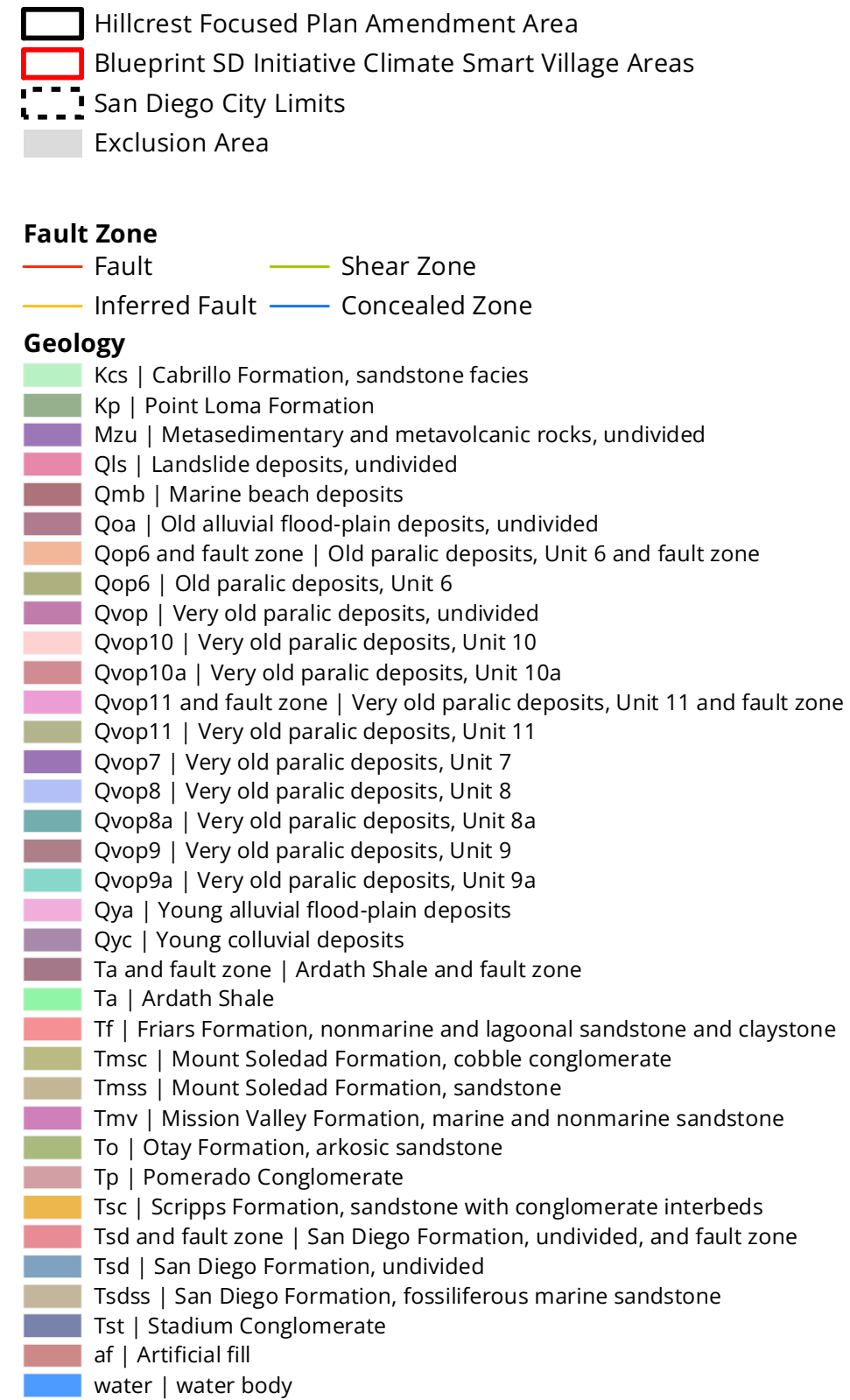
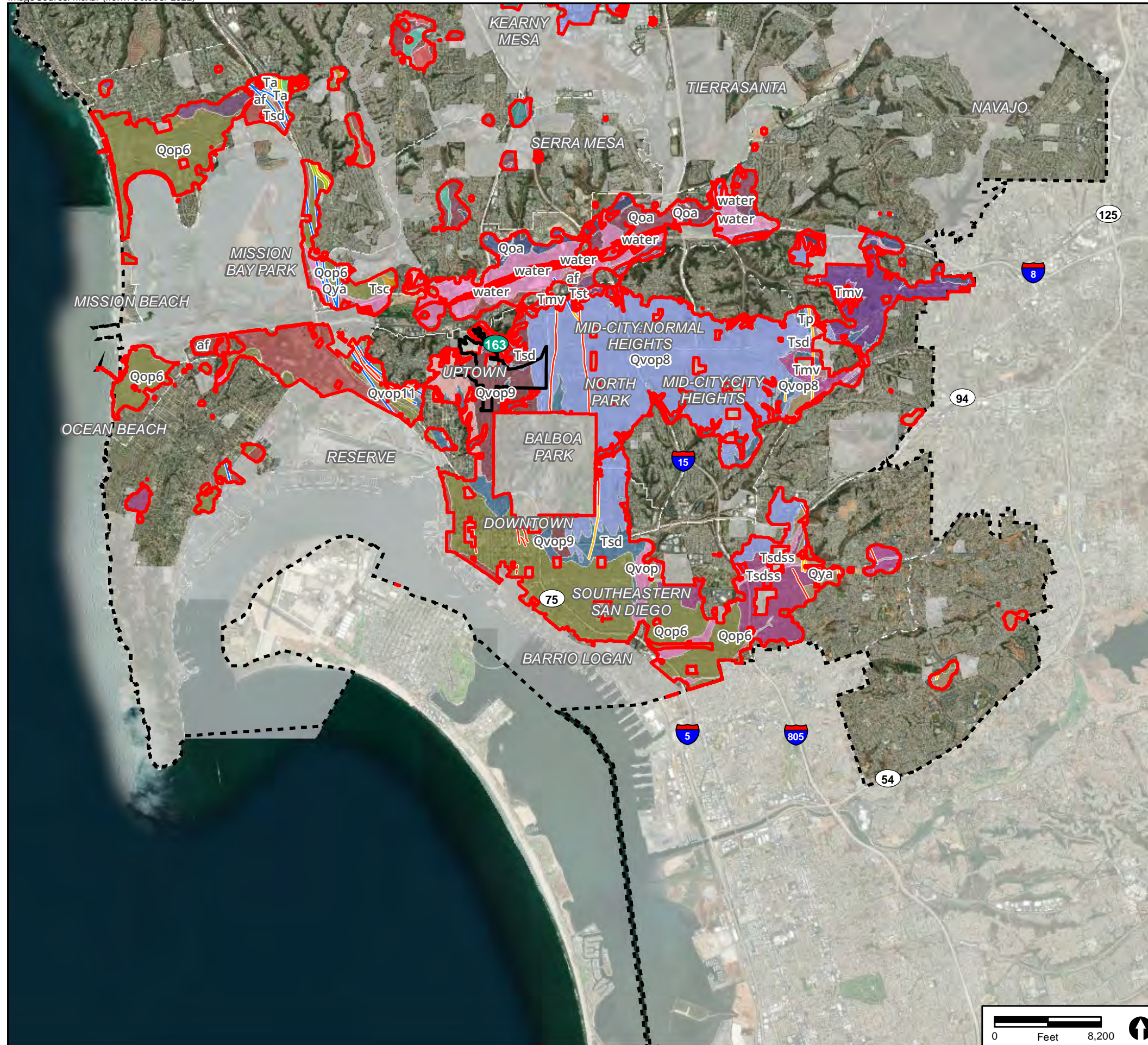
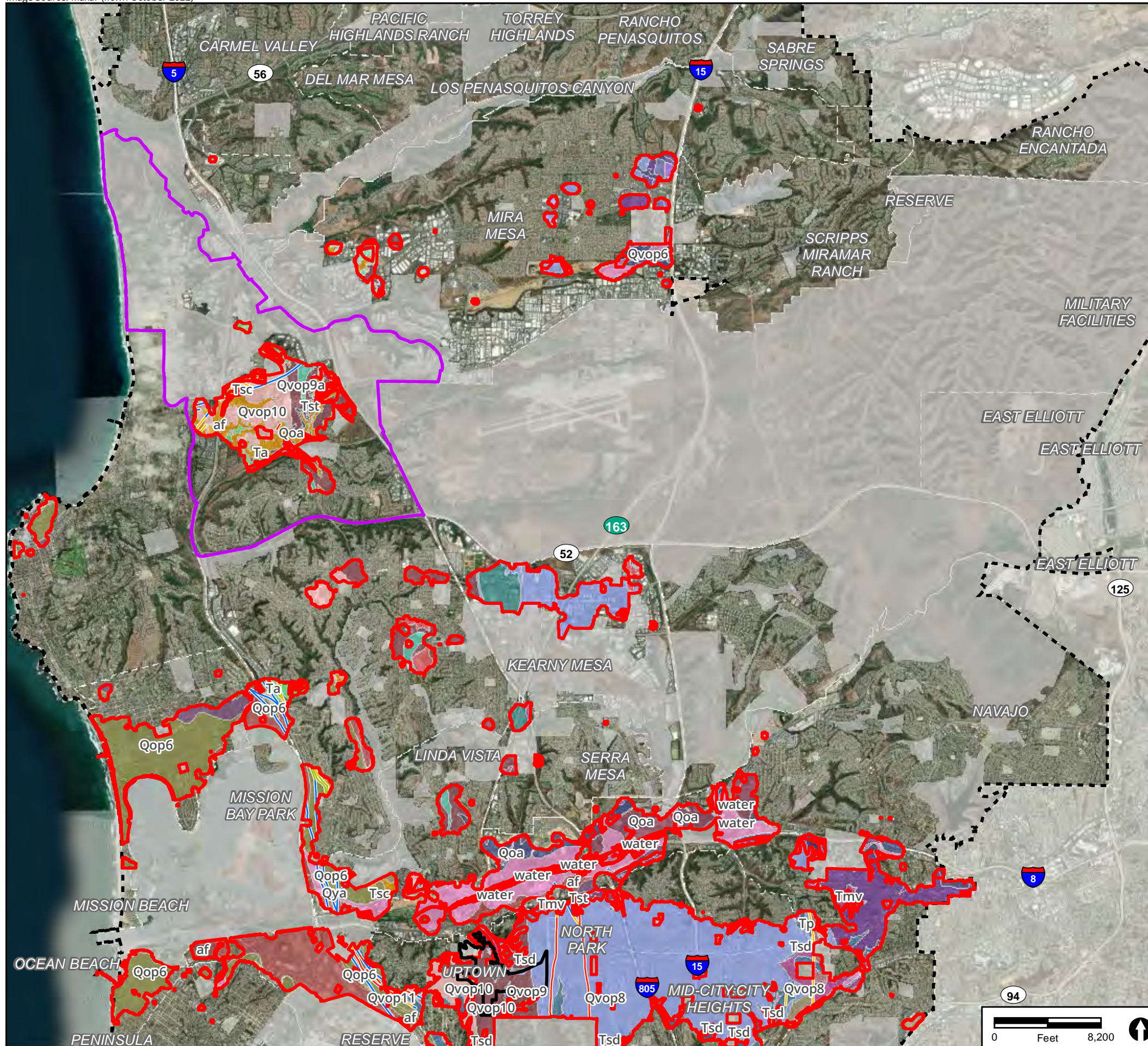


FIGURE 4.6-1b  
 Regional Geology in Relation to Blueprint SD Initiative  
 Climate Smart Village Areas - South Central

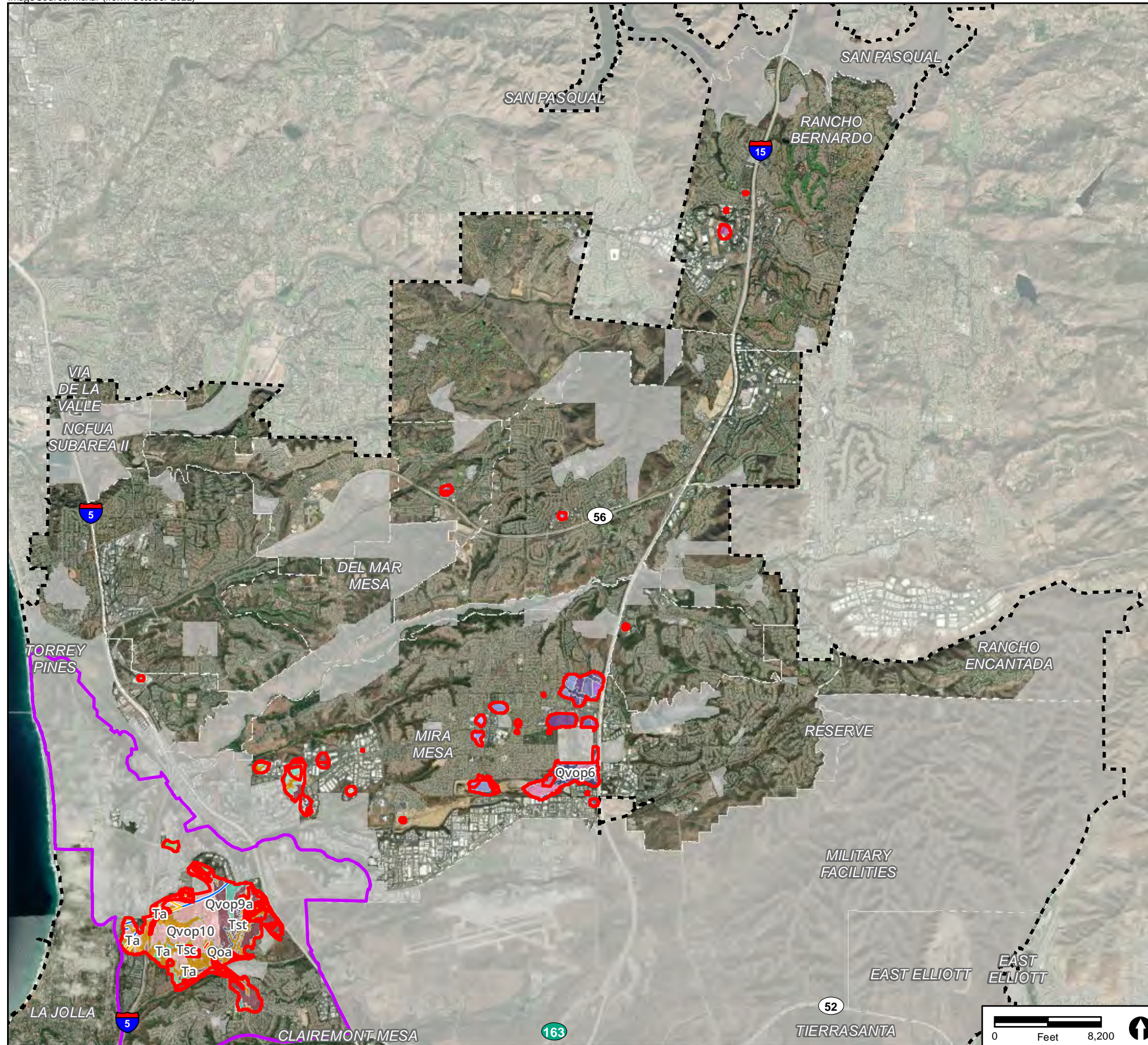




- Hillcrest Focused Plan Amendment Area
  - University Community Plan Update Area
  - Blueprint SD Initiative Climate Smart Village Areas
  - San Diego City Limits
  - Exclusion Area
- 
- Fault Zone**
- Fault
  - Inferred Fault
  - Shear Zone
  - Concealed Zone
- Geology**
- Kcs | Cabrillo Formation, sandstone facies
  - Kd | Diorite, undivided
  - Kp | Point Loma Formation
  - Mzu | Metasedimentary and metavolcanic rocks, undivided
  - Qls | Landslide deposits, undivided
  - Qmb | Marine beach deposits
  - Qoa | Old alluvial flood-plain deposits, undivided
  - Qop6 and fault zone | Old paralic deposits, Unit 6 and fault zone
  - Qop6 | Old paralic deposits, Unit 6
  - Qop7 | Old paralic deposits, Unit 7
  - Qvop | Very old paralic deposits, undivided
  - Qvop10 and fault zone | Very old paralic deposits, Unit 10 and fault zone
  - Qvop10 | Very old paralic deposits, Unit 10
  - Qvop10a | Very old paralic deposits, Unit 10a
  - Qvop11 and fault zone | Very old paralic deposits, Unit 11 and fault zone
  - Qvop11 | Very old paralic deposits, Unit 11
  - Qvop5 | Very old paralic deposits, Unit 5
  - Qvop6 | Very old paralic deposits, Unit 6
  - Qvop7 | Very old paralic deposits, Unit 7
  - Qvop8 | Very old paralic deposits, Unit 8
  - Qvop8a | Very old paralic deposits, Unit 8a
  - Qvop9 | Very old paralic deposits, Unit 9
  - Qvop9a | Very old paralic deposits, Unit 9a
  - Qya | Young alluvial flood-plain deposits
  - Qyc | Young colluvial deposits
  - Ta and fault zone | Ardath Shale and fault zone
  - Ta | Ardath Shale
  - Tf | Friars Formation, nonmarine and lagoonal sandstone and claystone
  - Tmsc | Mount Soledad Formation, cobble conglomerate
  - Tmss | Mount Soledad Formation, sandstone
  - Tmv | Mission Valley Formation, marine and nonmarine sandstone
  - Tp | Pomerado Conglomerate
  - Tsc and fault zone | Scripps Formation and fault zone
  - Tsc | Scripps Formation, sandstone with conglomerate interbeds
  - Tscu | Scripps Formation, tongue in Carroll Canyon
  - Tsd and fault zone | San Diego Formation, undivided, and fault zone
  - Tsd | San Diego Formation, undivided
  - Tsdss | San Diego Formation, fossiliferous marine sandstone
  - Tst | Stadium Conglomerate
  - Tt | Torrey Sandstone
  - af | Artificial fill
  - water | water body

**FIGURE 4.6-1c**  
Regional Geology in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North Central

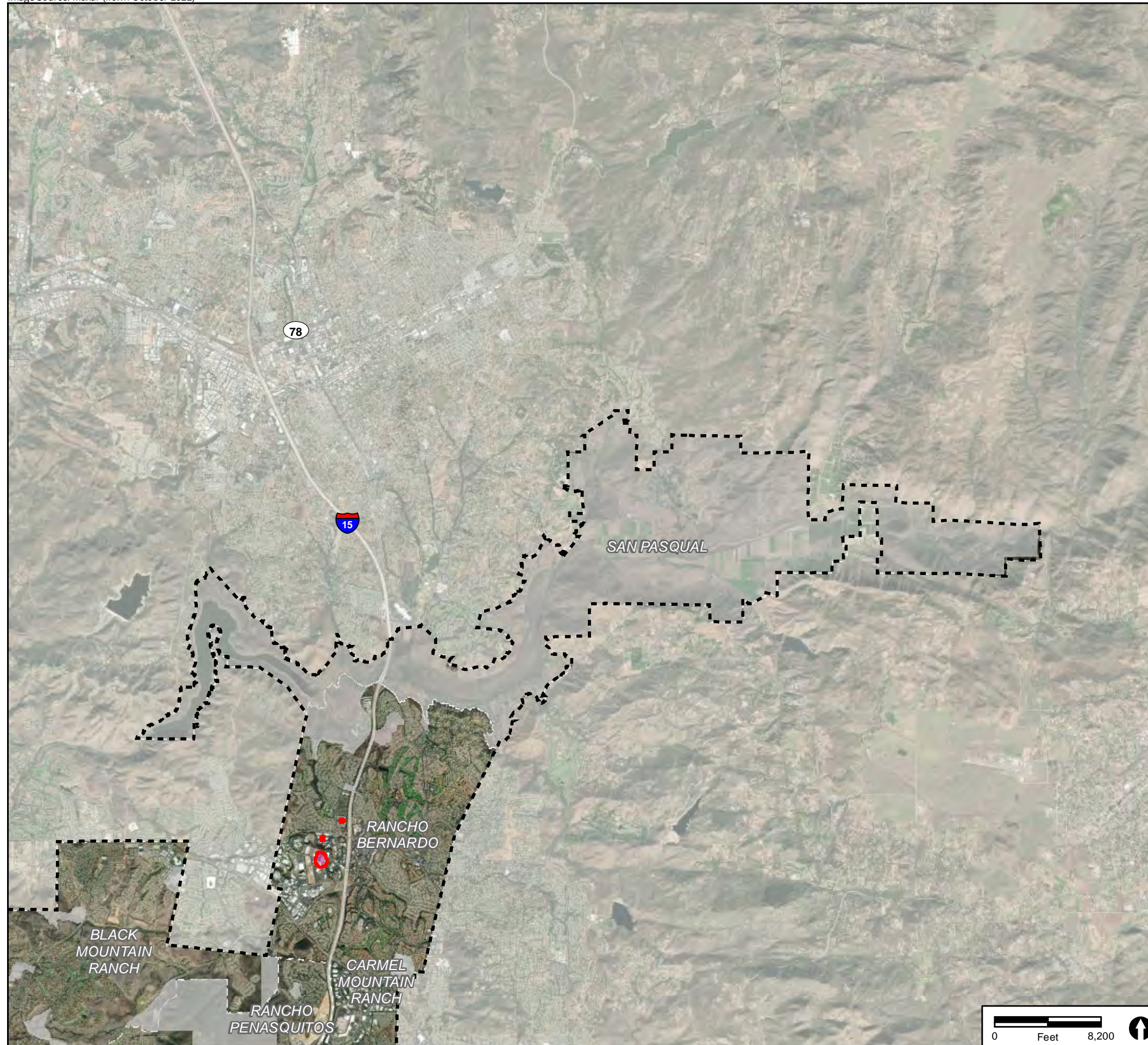




- University Community Plan Update Area
  - Blueprint SD Initiative Climate Smart Village Areas
  - San Diego City Limits
  - Exclusion Area
- 
- Fault Zone**
- Fault
  - Inferred Fault
  - Shear Zone
  - Concealed Zone
- Geology**
- Kd | Diorite, undivided
  - Mzu | Metasedimentary and metavolcanic rocks, undivided
  - Qls | Landslide deposits
  - Qls | Landslide deposits, undivided
  - Qls? | Landslide deposits, queried
  - Qoa | Old alluvial flood-plain deposits, undivided
  - Qop6 | Old paralic deposits, Unit 6
  - Qvop10 and fault zone | Very old paralic deposits, Unit 10 and fault zone
  - Qvop10 | Very old paralic deposits, Unit 10
  - Qvop5 | Very old paralic deposits, Unit 5
  - Qvop6 | Very old paralic deposits, Unit 6
  - Qvop7 | Very old paralic deposits, Unit 7
  - Qvop8 | Very old paralic deposits, Unit 8
  - Qvop8a | Very old paralic deposits, Unit 8a
  - Qvop9 | Very old paralic deposits, Unit 9
  - Qvop9a | Very old paralic deposits, Unit 9a
  - Qya | Young alluvial flood-plain deposits
  - Ta | Ardath Shale
  - Tf | Friars Formation, nonmarine and lagoonal sandstone and claystone
  - Tmv | Mission Valley Formation, marine and nonmarine sandstone
  - Tsc and fault zone | Scripps Formation and fault zone
  - Tsc | Scripps Formation, sandstone with conglomerate interbeds
  - Tscu | Scripps Formation, tongue in Carroll Canyon
  - Tst | Stadium Conglomerate
  - Tst | Stadium Conglomerate, cobble with coarse-grained sandstone matrix
  - Tt | Torrey Sandstone
  - af | Artificial fill

**FIGURE 4.6-1d**  
Regional Geology in Relation to Blueprint SD Initiative Climate Smart Village Areas - North





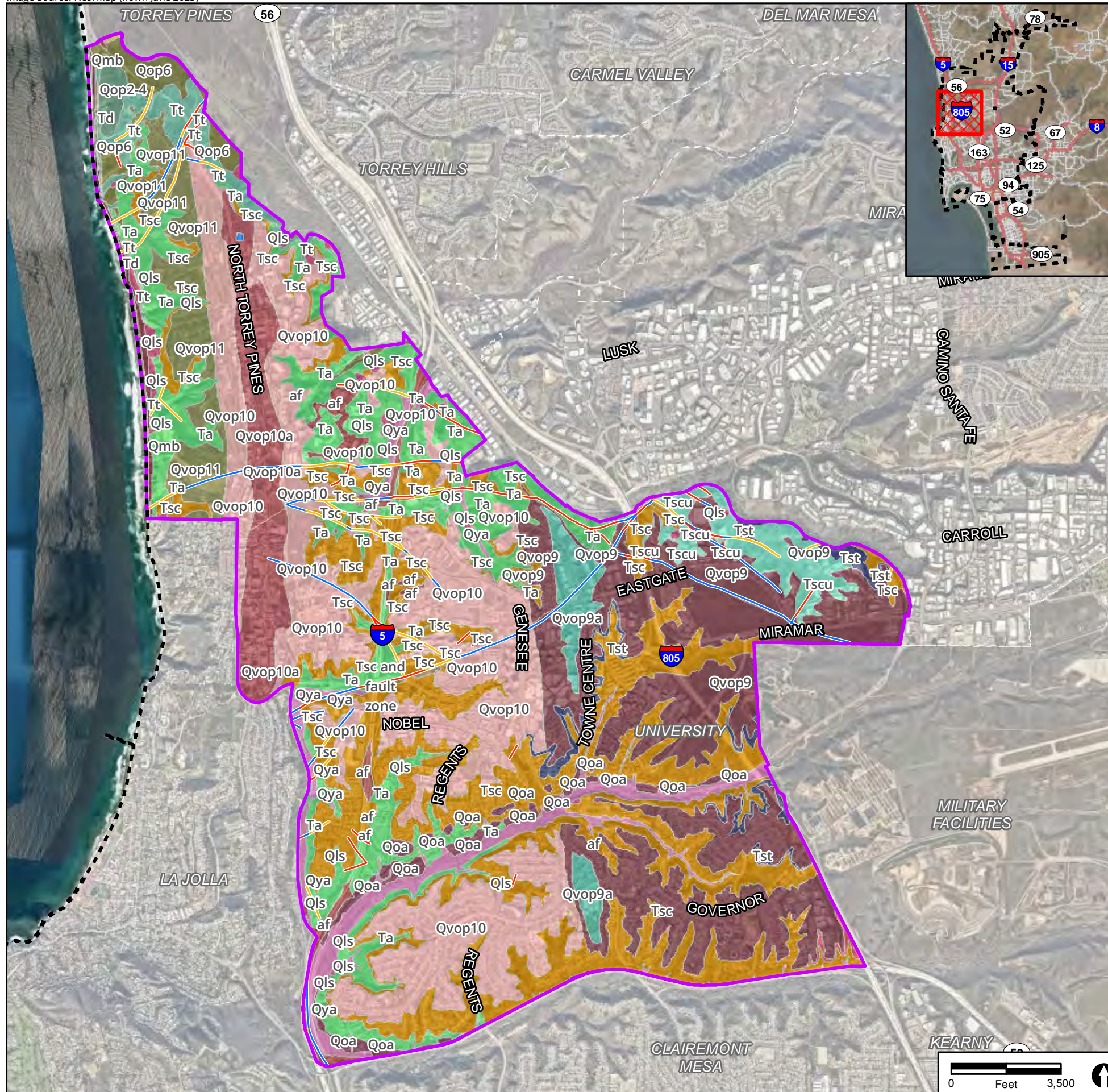
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Exclusion Area

**Geology**

- Qls | Landslide deposits
- Qls? | Landslide deposits, queried
- Qoa | Old alluvial flood-plain deposits, undivided
- Tmv | Mission Valley Formation, marine and nonmarine sandstone
- Tst | Stadium Conglomerate, cobble with coarse-grained sandstone matrix

FIGURE 4.6-1e  
Regional Geology in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - Northeast





- University Community Plan Update Area
  - San Diego City Limits
  - Fault
  - Inferred Fault
  - Shear Zone
  - Concealed Zone
- Geology**
- Qls | Landslide deposits, undivided
  - Qmb | Marine beach deposits
  - Qoa | Old alluvial flood-plain deposits, undivided
  - Qop2-4 | Old paralic deposits, Units 2-4, undivided
  - Qop6 | Old paralic deposits, Unit 6
  - Qpe | Paralic estuarine deposits
  - Qvop10 and fault zone | Very old paralic deposits, Unit 10 and fault zone
  - Qvop10 | Very old paralic deposits, Unit 10
  - Qvop10a | Very old paralic deposits, Unit 10a
  - Qvop11 | Very old paralic deposits, Unit 11
  - Qvop9 | Very old paralic deposits, Unit 9
  - Qvop9a | Very old paralic deposits, Unit 9a
  - Qya | Young alluvial flood-plain deposits
  - Ta | Ardath Shale
  - Td | Delmar Formation, sandy claystone interbedded with sandstone
  - Tf | Friars Formation, nonmarine and lagoonal sandstone and claystone
  - Tsc and fault zone | Scripps Formation and fault zone
  - Tsc | Scripps Formation, sandstone with conglomerate interbeds
  - Tscu | Scripps Formation, tongue in Carroll Canyon
  - Tst | Stadium Conglomerate
  - Tt | Torrey Sandstone
  - af | Artificial fill
  - water | water body

FIGURE 4.6-2  
Regional Geology in Relation to  
University Community Plan Update Area



- Qop 6 – Old paralic deposits, Unit 6 (late to middle Pleistocene). Old paralic deposits underlie portions of the northern portion of the University CPU area, along the base of the slopes bordering the western side of Sorrento Valley. The Old paralic deposits consist of poorly sorted, moderately permeable, reddish brown, interfingering strandline, beach, estuarine and colluvial deposits. The deposits are predominately siltstone, claystone, sandstone, and conglomerate. The Old paralic Unit 6 deposits are poorly to moderately consolidated.
- Qvop 11 – Very old paralic deposits, Unit 11 (middle to early Pleistocene). The very old paralic deposits, Unit 11, are found on the western most portion of the mesa areas and were deposited on the Clairemont Terrace (elevation 300-312 feet). The very old paralic deposits, Unit 11, consist of poorly sorted, moderately permeable, reddish-brown, interfingering strandline, beach estuarine and colluvial deposits composed of siltstone, sandstone, and conglomerate. The Unit 11 deposits are moderately to well consolidated and locally strongly cemented. All of the very old paralic deposits (Units 11-9) are exposed on the top of the mesa in the University CPU area. They are differentiated by subtle changes in lithology and basal elevation (progressively higher elevation marine-cut terraces upon which the sediments were deposited) and age (oldest units to the east becoming younger to the west). The very old paralic deposits are well consolidated and are usually suitable for light structural or thin fill loads. They are locally cemented and may create difficult excavation conditions for utility trenches or basements. An expansive highly plastic clay residual soil often forms on these deposits on the mesa tops.
- Qvop10 – Very old paralic deposits, Unit 10 (middle to early Pleistocene). The very old paralic deposits, Unit 10, underlie the western central portion of the mesa and were deposited on the Tecolote Terrace (elevation 338–344 feet). The very old paralic deposits, Unit 10, consist of poorly sorted, moderately permeable, reddish-brown, interfingering strandline, beach estuarine and colluvial deposits composed of siltstone, sandstone, and conglomerate. The Unit 10 deposits are moderately to well consolidated and locally well cemented.
- Qvop10a – Very old paralic deposits, Unit 10a (middle to early Pleistocene). Unit 10a very old paralic deposits consist of poorly sorted, moderately permeable, dark reddish-brown, dune and back beach “beach ridge” deposits composed of cross-bedded sandstone. The deposits are locally moderately to strongly cemented and are resistant to weathering, which has caused the deposits to form long, elongated ridges.
- Qvop9 – Very old paralic deposits, Unit 9 (middle to early Pleistocene) The very old paralic deposits, Unit 9, underlie the western central portion of the mesa and were deposited on the Linda Vista Terrace (elevation 384–391 feet). The very old paralic deposits, Unit 9, consist of poorly sorted, moderately permeable, reddish-brown, interfingering strandline, beach estuarine, and colluvial deposits composed of siltstone, sandstone, and conglomerate. The Unit 9 deposits are moderately to well consolidated and locally strongly cemented.
- Qvop9a – Very old paralic deposits, Unit 9a (middle to early Pleistocene). The very old paralic deposits, Unit 9a, underlie a subtle ridge in the middle of the mesa. They were deposited on the Linda Vista Terrace (elevation 384-391 feet). The Unit 9a deposits consist of poorly sorted, moderately permeable, reddish-brown, dune and back beach (beach ridge) deposits.

The sediments are composed of cross-bedded sandstone. The Unit 9a deposits are typically, moderately to highly consolidated and locally strongly cemented.

- Tsc – Scripps Formation (middle Eocene). This formation consists of yellowish-gray, medium-grained, sandstone with lenses of cobble conglomerate and claystone. The Scripps Formation underlies the entire University CPU area and is exposed in the slopes of all the canyons, Sorrento Valley, and coastal bluffs. The Scripps Formation is well consolidated and locally strongly cemented (concretion beds) and can typically support high structural and fill loads. Bedding is highly variable and can create potential slope instability where adverse structure and local claystone beds combine.
- Ta – Ardath Shale (middle Eocene). The Ardath Shale is exposed in most canyon slopes in all portions of the University CPU area. The formation is composed of highly fractured silty claystone and intercalated fine sandstone. Where fresh, the formation is well consolidated and locally strongly cemented. Where weathered, the formation desiccates into weak, sheared and remolded clay that is expansive and is unstable in slopes. Clay seams, shears, and faults in the unweathered formation can create unstable conditions in slopes where the local structure is adverse.
- Tt – Torrey Sandstone (middle Eocene). Torrey Sandstone is a white to light-brown, medium to coarse grained, moderately well indurated, massive to broadly cross-bedded sandstone underlying the northern portion of the University CPU area. The formation is named for the exposures in Torrey Pines State Park. The Torrey Sandstone is very well consolidated and can typically support fill and structural loads.
- Td – Delmar Formation (middle Eocene). The Delmar Formation is composed of interbedded lenses of sandstone and claystone. The Delmar Formation, where fresh, is well consolidated, and locally moderately to strongly cemented. Where weathered, especially in slopes, the claystone becomes fractured and weak creating unstable conditions. The Delmar Formation is only present at the base of the coastal bluffs in the northernmost portion of the University CPU area.

### c. Hillcrest Focused Plan Amendment

As detailed in the Uptown CPU PEIR's Geotechnical Report, the Uptown Community Planning area, including the Hillcrest FPA area, is underlain by four surficial soil deposits and three geologic formations. The surficial soils include artificial fill (unmapped), topsoil/colluvium, alluvium (unmapped), and very old terrace deposits (formerly Lindavista Formation). The geologic formations include the San Diego Formation, Pomerado Conglomerate, and Mission Valley Formation. The distribution of geologic units in relation to the Hillcrest FPA area is shown on Figure 4.6-1b and Figure 4.6-1c.

#### 4.6.1.2 Faults and Seismicity

Southern California is one of the most seismically active regions in the United States, with numerous active faults and a history of destructive earthquakes. Portions of the City are located above active strands of the Rose Canyon Fault. Other active faults in the region include the San Andreas, San

Jacinto, Elsinore, Coronado Bank, San Clemente, and San Diego Trough faults. The location of the City in close proximity to large earthquake faults increases the potential of earthquake damage to structures and potentially endangers the safety of the City's inhabitants. Damage to structures and improvements caused by a major earthquake will depend on the distance to the epicenter, the magnitude of the event, the underlying soil, and the quality of construction. The severity of an earthquake can be expressed in terms of both intensity and magnitude.

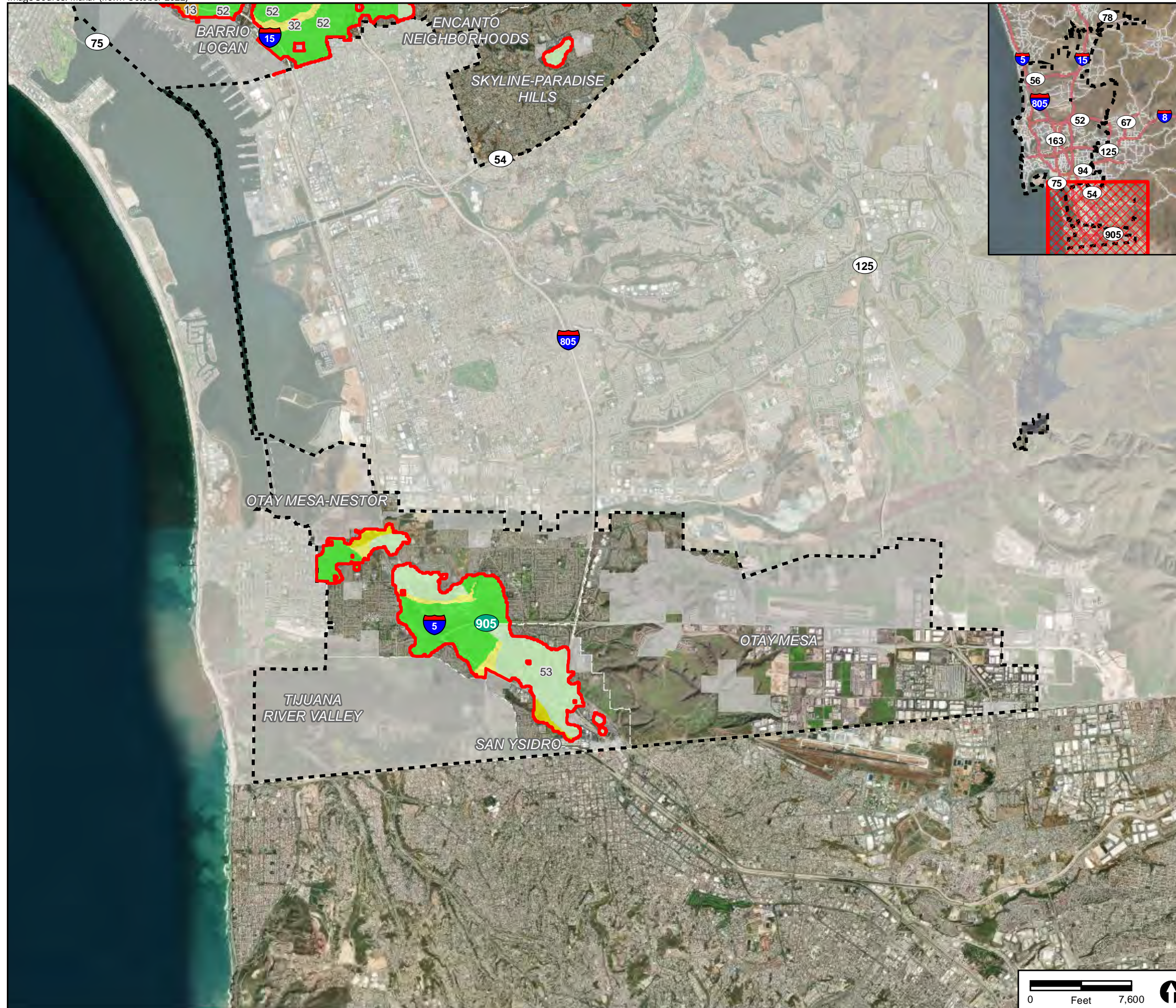
An active fault is defined by the State Mining and Geology Board as one that has experienced surface displacement within the Holocene epoch, i.e., during the last 11,000 years. The City's Seismic Safety Study documents the City's known and suspected geologic hazards and faults. The 2008 updated Seismic Safety Study maps potential hazards and rates them by relative risk, on a scale from nominal to high. Regional faults and mapped geologic hazards based on the City's Seismic Safety Study in relation to the Blueprint SD Initiative's Climate Smart Village Areas, the Hillcrest FPA area, and the University CPU area are shown in Figures 4.6-3a through 4.6-3e and Figure 4.6-4. As detailed in Table 4.6-1, approximately 1,498 acres of the Blueprint SD Initiative's Climate Smart Village Areas are located in the Downtown special fault zone. Approximately 47 acres of the Blueprint SD Initiative's Climate Smart Village Areas are located in an Alquist-Priolo earthquake fault zone. While no active fault zones are mapped within the University CPU or Hillcrest FPA area, these areas would be subject to potential ground shaking caused by activity along faults.

### **a. Ground Shaking**

Ground shaking during an earthquake can vary depending on the overall magnitude, distance to the fault, focus of earthquake energy, and the type of geologic material underlying the area. The composition of underlying soils, even those relatively distant from faults, can intensify ground shaking. Areas that are underlain by bedrock tend to experience less ground shaking than those underlain by unconsolidated sediments such as artificial fill or unconsolidated alluvial fill. For example, the Rose Canyon Fault can produce a magnitude 7.2 earthquake; and portions of the Elsinore and San Jacinto fault zones, located east of the City have the capacity to produce earthquakes at maximum magnitudes from 6.4 to 7.2.

The San Diego region is located within the western (coastal) portion of the Peninsular Ranges Geomorphic Province of California. Structurally, the Peninsular Ranges are traversed by several major active faults. The Elsinore, San Jacinto, and the San Andreas faults are major active fault zones located northeast of the City. The Rose Canyon, San Diego Trough, Coronado Banks, and San Clemente faults are major active faults located within or west-southwest of the City. Major tectonic activity associated with these and other faults within this regional tectonic framework is generally right-lateral strike-slip movement. These faults, as well as other faults in the region, have the potential for generating strong ground motions in the project area.

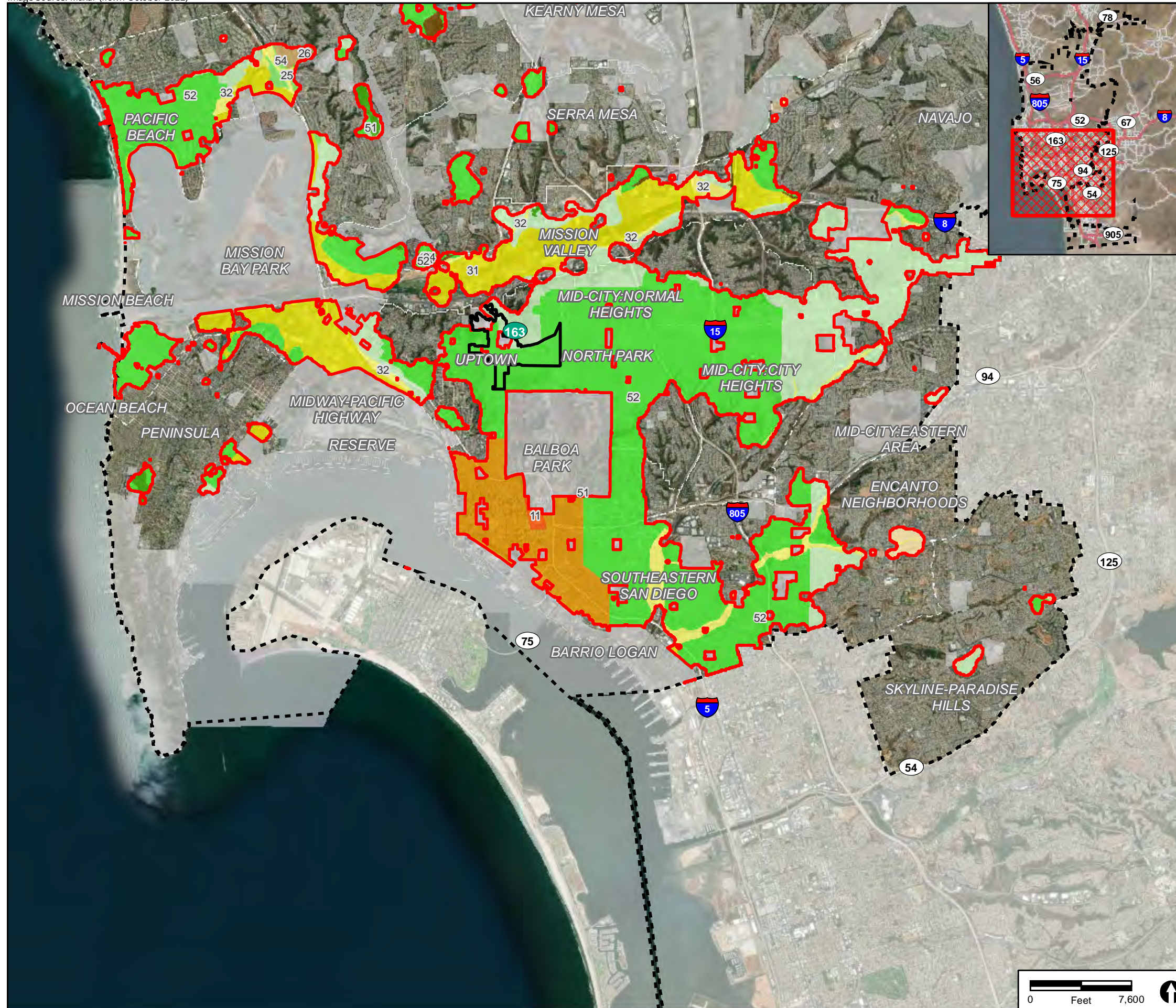




- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Exclusion Area
- Geologic Hazards**
- Fault Zones*
- 13 | Downtown Special Fault Zone
- Landslides*
- 21 | Confirmed, known, or highly suspected
- Slide Prone Formation*
- 27 | Otay, Sweetwater and others
- Liquefaction*
- 31 | High Potential-shallow groundwater major drainages, hydraulic fills
- 32 | Low Potential-fluctuating groundwater minor drainages, hydraulic fills
- All Other Conditions*
- 52 | Other level areas; gently sloping to steep terrain, favorable geologic structure low risk
- 53 | Level or sloping terrain, unfavorable geologic structure, low to moderate risk

FIGURE 4.6-3a  
Geologic Hazards in Relation to  
Blueprint SD Initiative  
Climate Smart Village Areas - South

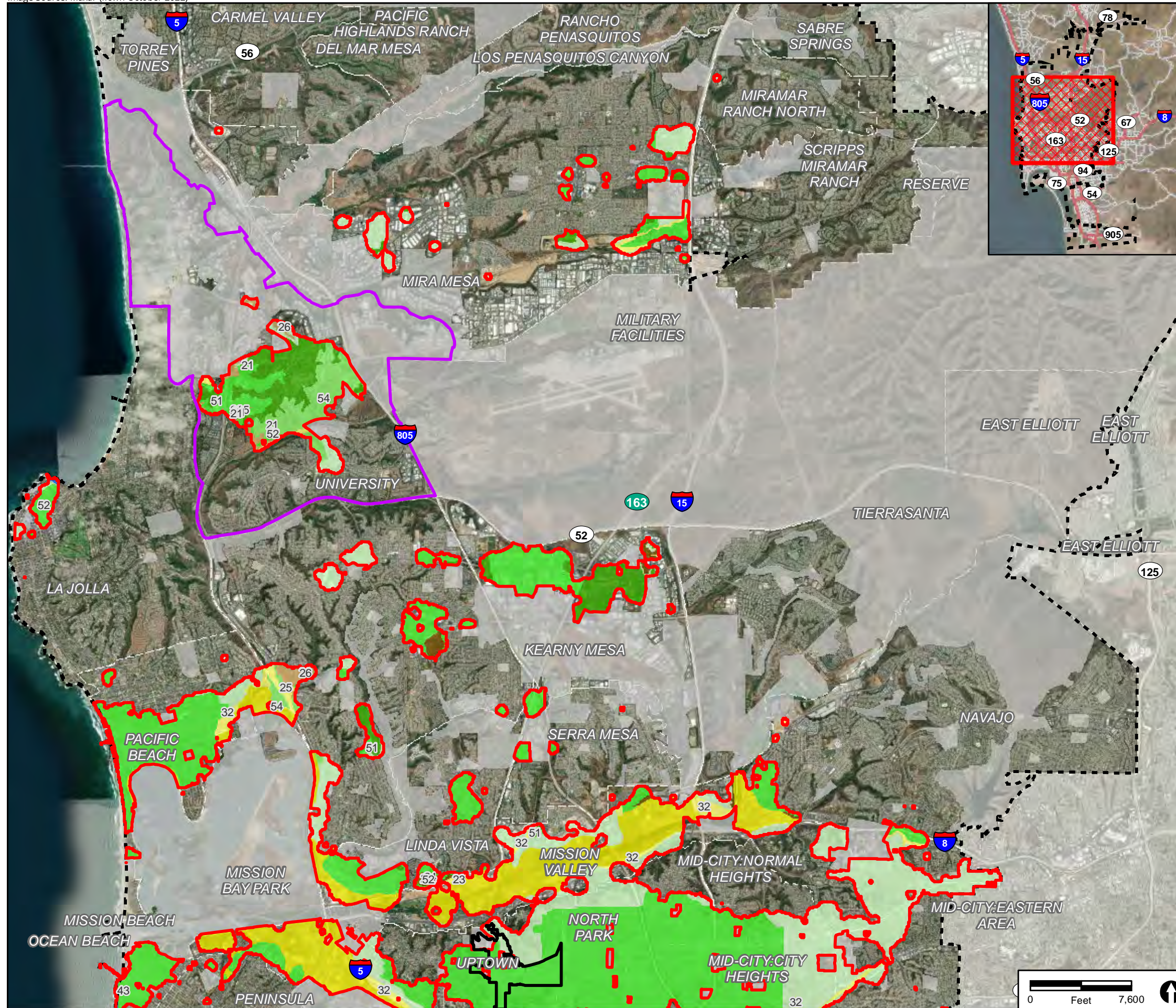




- Blueprint SD Initiative Climate Smart Village Areas
  - Hillcrest Focused Plan Amendment Area
  - San Diego City Limits
  - Exclusion Area
- Geologic Hazards**
- Fault Zones*
- 11 | Active, Alquist-Priolo Earthquake Fault Zone
  - 13 | Downtown Special Fault Zone
- Slide Prone Formation*
- 23 | Friars-neutral or favorable geologic structure
  - 24 | Friars- unfavorable geologic structure
  - 25 | Ardath- neutral or favorable geologic structure
  - 26 | Ardath- unfavorable geologic structure
  - 27 | Otay, Sweetwater and others
- Liquefaction*
- 31 | High Potential-shallow groundwater major drainages, hydraulic fills
  - 32 | Low Potential-fluctuating groundwater minor drainages, hydraulic fills
- Coastal Bluffs*
- 43 | Generally unstable; Unfavorable jointing, local high erosion
  - 44 | Moderately stable. Mostly stable formations, local high erosion
  - 47 | Generally stable. Favorable geologic structures, minor or no erosion, no landslides
  - 48 | Generally stable. Broad beach areas, developed harbor
- All Other Conditions*
- 51 | Level mesas-underlain by terrace deposits and bedrock, nominal risk
  - 52 | Other level areas; gently sloping to steep terrain, favorable geologic structure low risk
  - 53 | Level or sloping terrain, unfavorable geologic structure, low to moderate risk
  - 54 | Steeply sloping terrain, unfavorable or fault controlled geologic structure, moderate risk

FIGURE 4.6-3b  
Geologic Hazards in Relation to  
Blueprint SD Initiative  
Climate Smart Village Areas - South Central

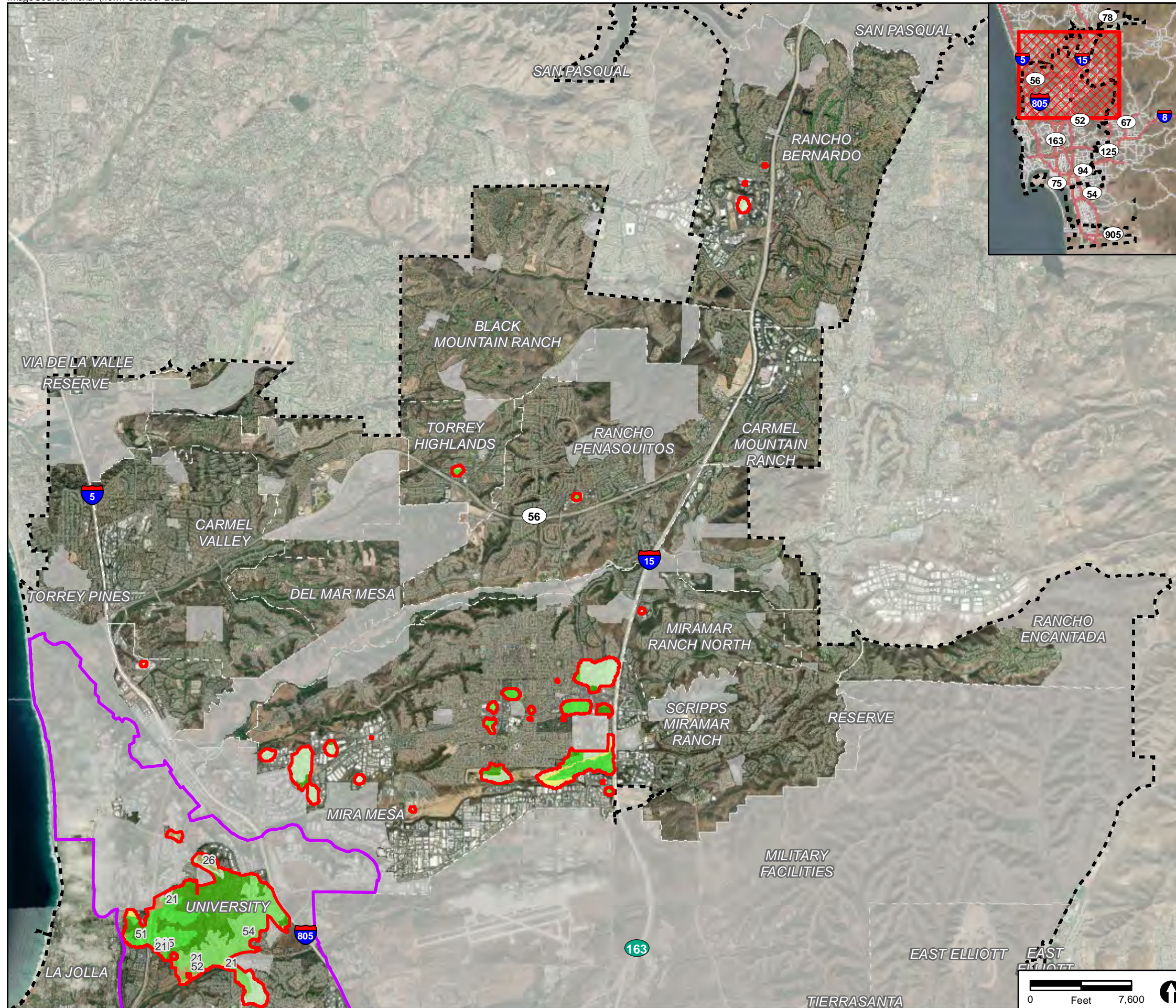




- Blueprint SD Initiative Climate Smart Village Areas
  - Hillcrest Focused Plan Amendment Area
  - University Community Plan Update Area
  - San Diego City Limits
  - Exclusion Area
- Geologic Hazards**
- Landslides*
- 21 | Confirmed, known, or highly suspected
- Slide Prone Formation*
- 23 | Friars-neutral or favorable geologic structure
  - 24 | Friars- unfavorable geologic structure
  - 25 | Ardath- neutral or favorable geologic structure
  - 26 | Ardath- unfavorable geologic structure
- Liquefaction*
- 31 | High Potential-shallow groundwater major drainages, hydraulic fills
  - 32 | Low Potential-fluctuating groundwater minor drainages, hydraulic fills
- Coastal Bluffs*
- 43 | Generally unstable; Unfavorable jointing, local high erosion
  - 44 | Moderately stable. Mostly stable formations, local high erosion
  - 47 | Generally stable. Favorable geologic structures, minor or no erosion, no landslides
  - 48 | Generally stable. Broad beach areas, developed harbor
- All Other Conditions*
- 51 | Level mesas-underlain by terrace deposits and bedrock, nominal risk
  - 52 | Other level areas; gently sloping to steep terrain, favorable geologic structure low risk
  - 53 | Level or sloping terrain, unfavorable geologic structure, low to moderate risk
  - 54 | Steeply sloping terrain, unfavorable or fault controlled geologic structure, moderate risk

FIGURE 4.6-3c  
Geologic Hazards in Relation to  
Blueprint SD Initiative  
Climate Smart Village Areas - North Central

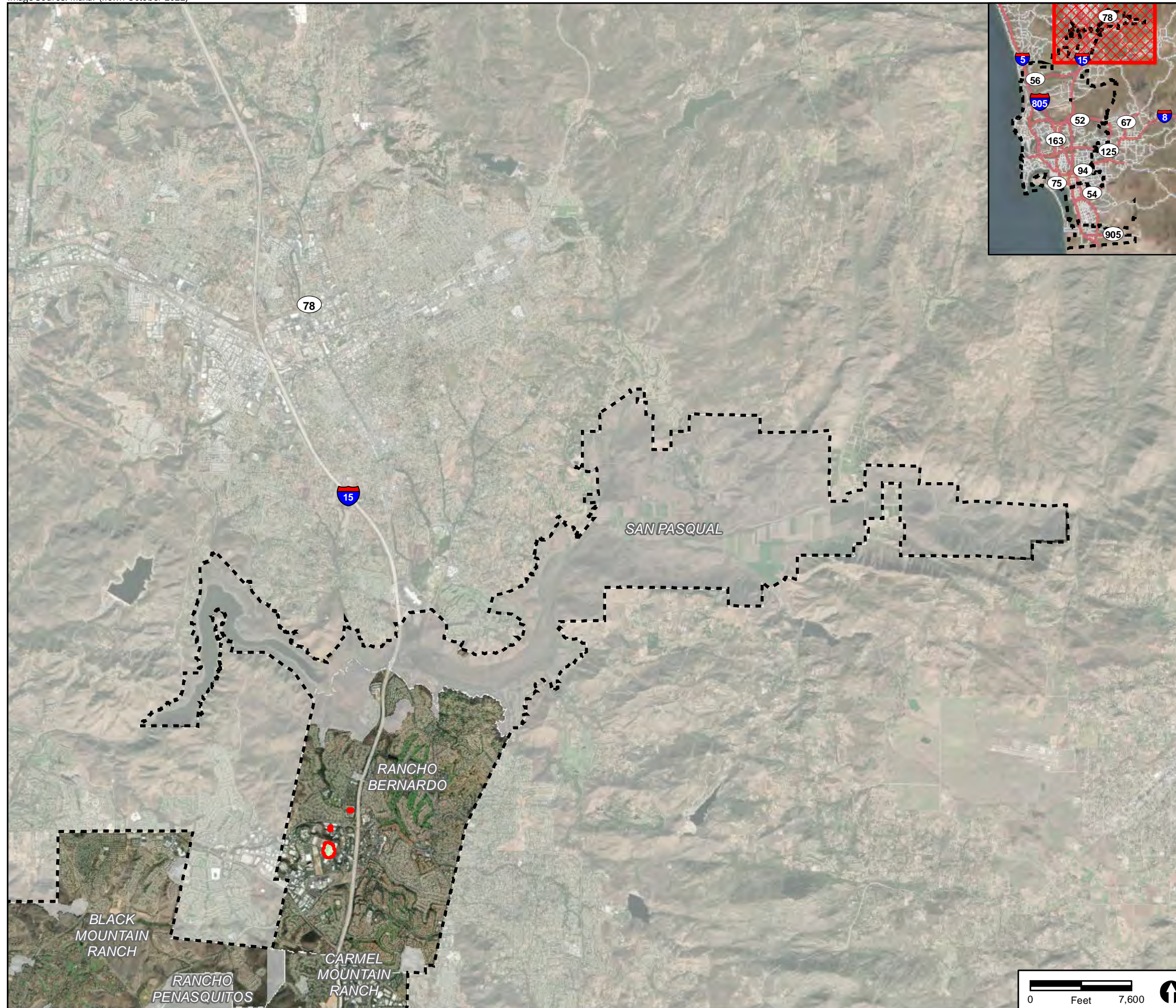




- Blueprint SD Initiative Climate Smart Village Areas
  - University Community Plan Update Area
  - San Diego City Limits
  - Exclusion Area
- Geologic Hazards**
- Landslides*
- 21 | Confirmed, known, or highly suspected
- Slide Prone Formation*
- 24 | Friars- unfavorable geologic structure
  - 25 | Ardath- neutral or favorable geologic structure
  - 26 | Ardath- unfavorable geologic structure
  - 27 | Otay, Sweetwater and others
- Liquefaction*
- 32 | Low Potential-fluctuating groundwater minor drainages, hydraulic fills
- Coastal Bluffs*
- 43 | Generally unstable; Unfavorable jointing, local high erosion
- All Other Conditions*
- 51 | Level mesas-underlain by terrace deposits and bedrock, nominal risk
  - 52 | Other level areas; gently sloping to steep terrain, favorable geologic structure low risk
  - 53 | Level or sloping terrain, unfavorable geologic structure, low to moderate risk
  - 54 | Steeply sloping terrain, unfavorable or fault controlled geologic structure, moderate risk

FIGURE 4.6-3d  
Geologic Hazards in Relation to  
Blueprint SD Initiative  
Climate Smart Village Areas - North

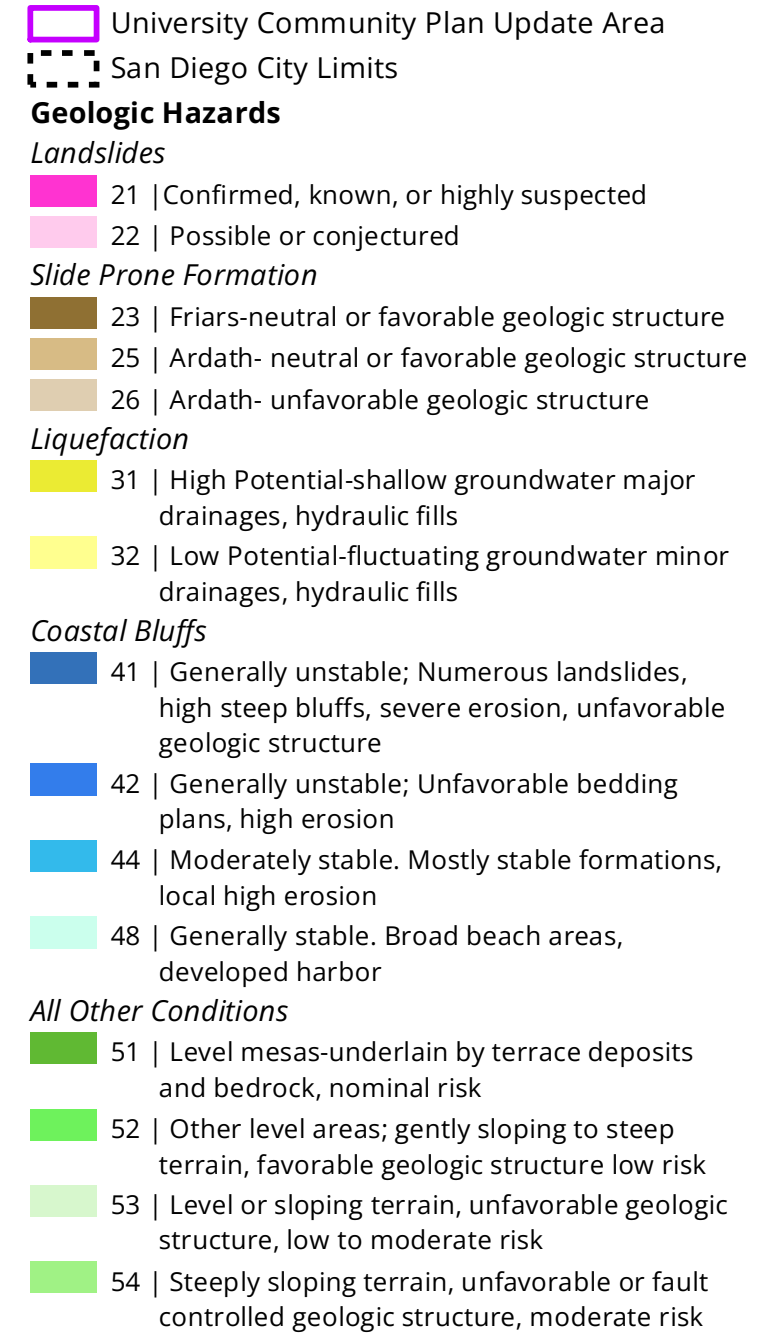
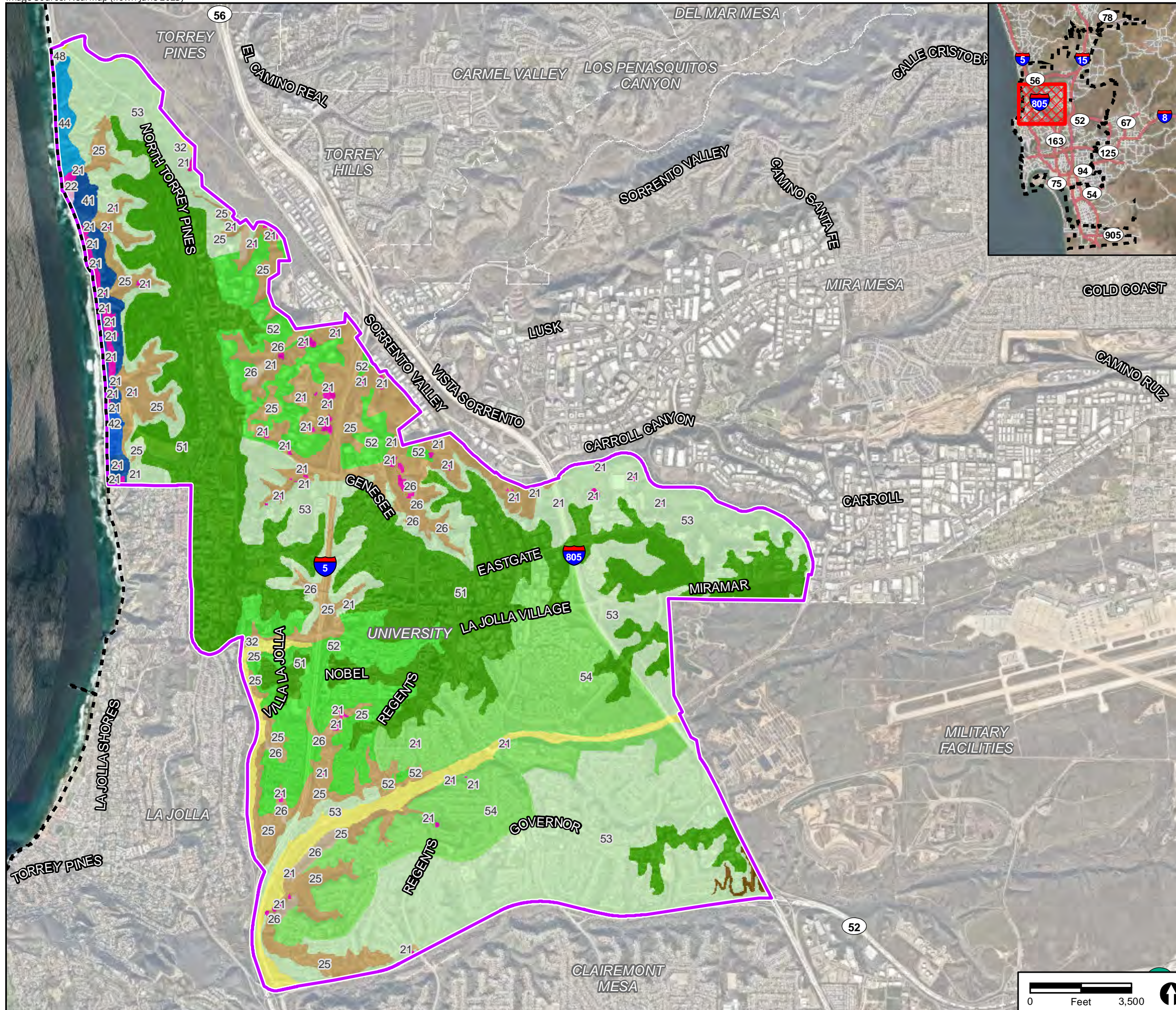




- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Exclusion Area
- Geologic Hazards**
- Landslides*
- 21 | Confirmed, known, or highly suspected
- Slide Prone Formation*
- 24 | Friars- unfavorable geologic structure
- 27 | Otay, Sweetwater and others
- Liquefaction*
- 32 | Low Potential-fluctuating groundwater minor drainages, hydraulic fills
- All Other Conditions*
- 52 | Other level areas; gently sloping to steep terrain, favorable geologic structure low risk
- 53 | Level or sloping terrain, unfavorable geologic structure, low to moderate risk

FIGURE 4.6-3e  
Geologic Hazards in Relation to  
Blueprint SD Initiative  
Climate Smart Village Areas - Northeast





**FIGURE 4.6-4**  
Geologic Hazards in Relation to  
University Community Plan Update Area



<b>Table 4.6-1 City Seismic Safety Study Data in Relation to the Project Areas</b>			
	<b>Climate Smart Village Areas (acres)</b>	<b>Hillcrest FPA Area (acres)</b>	<b>University CPU Area (acres)</b>
51 ALL OTHER CONDITIONS: Level mesas-underlain by terrace deposits and bedrock, nominal risk	1,085		2,280
52 ALL OTHER CONDITIONS: other level areas; gently sloping to steep terrain, favorable geologic structure low risk	12,193	314	784
53 ALL OTHER CONDITIONS: Level or sloping terrain, unfavorable geologic structure, low to moderate risk	5,293	66	2,692
54 ALL OTHER CONDITIONS: Steeply sloping terrain, unfavorable or fault controlled geologic structure, moderate risk	584		1,187
41 COASTAL BLUFFS-Generally unstable; numerous landslides, high steep bluffs, severe erosion, unfavorable geologic structure			115
42 COASTAL BLUFFS-Generally unstable; Unfavorable bedding plans, high erosion			20
43 COASTAL BLUFFS-Generally unstable; Unfavorable jointing, local high erosion	14		
44 COASTAL BLUFFS-Moderately stable. Mostly stable formations, local high erosion	5		56
47 COASTAL BLUFFS-Generally stable. Favorable geologic structures, minor or no erosion, no landslides			
48 COASTAL BLUFFS-Generally stable. Broad beach areas, developed harbor	11		4
11 FAULT ZONES-Active, Alquist-Priolo Earthquake Fault Zone	47		
13 FAULT ZONES-Downtown Special Fault Zone	1,498		
21 LANDSLIDES-Confirmed, known, or highly suspected	7		91
22 LANDSLIDES-possible or conjectured			4
31 LIQUEFACTION-High Potential-shallow groundwater major drainages, hydraulic fills	2,815		6
32 LIQUEFACTION-Low Potential-fluctuating groundwater minor drainages, hydraulic fills	940		247
23 SLIDE PRONE FORMATION: Friars-neutral or favorable geologic structure	123		17
24 SLIDE PRONE FORMATION: Friars-unfavorable geologic structure	12		
25 SLIDE PRONE FORMATION: Ardath-neutral or favorable geologic structure	162		1,109
26 SLIDE PRONE FORMATION: Ardath-unfavorable geologic structure	3		64
27 SLIDE PRONE FORMATION: Otay, Sweetwater, and others	125		
<b>TOTAL</b>	<b>24,919*</b>	<b>380</b>	<b>8,676</b>
*Totals may vary due to independent rounding. SOURCE: City of San Diego 2008 NOTE: Totals for each project area include overlapping acreages where the Climate Smart Village Areas are located in the University CPU area and Hillcrest FPA area.			

The Blueprint SD Initiative, University CPU, and Hillcrest FPA areas are subject to ground shaking hazards caused by earthquakes on regional active faults. As detailed in the desktop Geotechnical Investigation for the University CPU area, the University CPU area is located in a zone where the horizontal peak ground acceleration having a 10 percent probability of exceedance in 50 years is 0.247g (where g represents the acceleration of gravity). Although much less probable, a large earthquake on the Rose Canyon fault zone could create twice the accelerations and cause widespread damage in the University CPU area.

As part of the Uptown CPU PEIR's Geotechnical Report, it was determined that the Uptown Community Planning area could be subject to moderate to severe ground shaking in the event of an earthquake, resulting in potential peak ground acceleration up to 0.56g, depending on the specific fault and distance from the site. Additionally, the Uptown CPU PEIR reported that the Uptown Community Planning area is in a zone where the horizontal peak ground acceleration having a 10 percent probability of exceedance in a 50-year period ranges from 0.24g to 0.27g depending on the source of the data.

### **b. Surface Fault Rupture**

Surface fault rupture is the result of movement on an active fault reaching the surface. Southern California is considered one of the most seismically active regions in the United States, with numerous active faults and a history of destructive earthquakes. Several earthquake fault zones, as well as numerous smaller faults, exist in the City and in southern California.

The San Jacinto Fault is the largest of the active faults in the San Diego region. The fault extends 125 miles from the Imperial Valley to San Bernardino. The Elsinore Fault represents a serious earthquake hazard for most of the populated areas of the San Diego region. This fault is approximately 135 miles long and is located approximately 40 miles north and east from Downtown San Diego. The Rose Canyon fault zone is an active offshore/onshore fault located partially offshore as part of the Newport/Inglewood fault zone and parallels the San Diego north county coastline within approximately two to six miles until coming ashore near La Jolla Shores. In addition, the La Nacion fault zone runs parallel to the Rose Canyon fault zone and San Diego Bay, approximately five miles inland from the bay (City of San Diego 2007).

As part of the Uptown CPU PEIR's Geotechnical Report, it was determined that the Uptown Community Planning area is located on the eastern margin of the Rose Canyon Fault Zone. These faults are considered to have a potential for surface rupture unless site-specific studies demonstrate otherwise.

### **c. Liquefaction, Seismically Induced Settlement, and Lateral Spread**

Liquefaction is a phenomenon whereby unconsolidated and/or near-saturated soils lose cohesion as a result of severe vibratory motion. The relatively rapid loss of soil shear strength during strong earthquake shaking results in a temporary, fluid-like behavior of the soil. Soil liquefaction causes ground failure that can damage roads, pipelines, underground cables, and buildings with shallow foundations. Research and historical data indicate that loose granular soils and non-plastic silts that are saturated by a relatively shallow groundwater table are susceptible to liquefaction.



Liquefaction-induced ground failure can involve a complex interaction among seismic, geologic, soil, topographic, and groundwater factors. Failures can include ground fissures, sand boils, ground settlement, and loss of bearing strength; buoyancy effects; ground oscillation; flow failure; and complex lateral spread landslides. The three key factors that indicate whether an area is potentially susceptible to liquefaction are the capacity for severe ground shaking, shallow groundwater, and low-density granular deposits (mainly finer grained sands). It is in these areas, where alluvium is sufficiently loose and groundwater is sufficiently shallow, that strong earthquake shaking could cause sediments to lose bearing capacity, severe settlement of surface facilities could occur, and, in some cases, uplift of buried structures (e.g., large pipelines) could occur.

Among the potential hazards related to liquefaction are seismically induced settlement and lateral spread. Seismically induced settlement is caused by the reduction of shear strength due to loss of grain-to-grain contact during liquefaction and may result in dynamic settlement on the order of several inches to several feet. Lateral spreading of the ground surface during an earthquake usually takes place along weak shear zones that have formed within a liquefiable soil layer. Lateral spreading has generally been observed to take place in the direction of a free-face (i.e., retaining wall, slope, channel, etc.) but has also been observed to a lesser extent on ground surfaces with gentle slopes. For sites located in proximity to a free-face, the amount of lateral ground displacement is strongly correlated with the distance of the site from the free-face. Other factors such as earthquake magnitude, distance from the earthquake epicenter, thickness of the liquefiable layers, and the fines content and particle sizes of the liquefiable layers will also affect the amount of settlement or lateral ground displacement.

As shown in Figures 4.6-3a through 4.6-3e, Figure 4.6-4, and reported in Table 4.6-1, portions of the Blueprint SD Initiative's Climate Smart Village Areas and the University CPU area have high liquefaction potential. As shown in Figure 4.6-3b, the Hillcrest FPA area is located within an area with favorable geologic structure and low geologic risk. No liquefaction risk is identified in the Hillcrest FPA area.

Liquefaction prone soil in the University CPU area is confined to existing canyon bottoms and Sorrento Valley which are not likely to undergo lateral spreading. Liquefiable soil is located in the bottoms of San Clemente Canyon, Rose Canyon, and Sorrento Valley.

As part of the Uptown CPU PEIR's Geotechnical Report, it was determined that the potential for liquefaction and seismically induced settlement occurring for the mesa top areas is very low due to the very dense cemented condition of the geologic formations and lack of groundwater.

### **4.6.1.3 Slope Instability**

Slopes steeper than 2:1 (horizontal:vertical) are susceptible to landslides or slope failure. Slope failure is dependent on topography and underlying geologic materials, as well as factors such as rainfall, excavation, or seismic activities that can precipitate slope instability. Earthquake motions can induce significant horizontal and vertical dynamic stresses along potential failure surfaces within a slope. Based on a review of the City's Seismic Safety Study, approximately 1,717 acres of land within the Blueprint SD Initiative's Climate Smart Village Areas and the University CPU area contain

slide prone formations and risk of landslides as reported in Table 4.6-1. No slide prone formations are mapped within the Hillcrest FPA area based on a review of the City's Seismic Safety Study.

Slopes with potentially unstable characteristics in the University CPU area are associated with San Clemente Canyon and Rose Canyon, including their tributaries, slopes, and tributary canyons to the west side of Sorrento Valley, and the coastal bluffs adjacent to the Torrey Pines Municipal Golf Course and Torrey Pines State Park. The unstable slopes and existing landslides are associated with the Scripps Formations, Ardath Shale, and faulted areas within the University CPU area (see Figure 4.6-4). The mesa areas are underlain by very old paralic deposits which have high shear strengths and provide the stable cap that creates the mesa on which most of the community was developed. The combination of steep natural slopes, building and fill loads, and infiltration of irrigation and storm water can create conditions that result in landslides in an urban development (City of San Diego 2008). Man-made slopes resulting from grading associated with commercial and residential development are presumed to have been engineered in accordance with City requirements. The coastal bluffs located on the eastern edge of the University CPU area exhibit slope stability conditions that range from moderately stable to unstable with numerous ancient and active landslides.

According to the City's Seismic Safety Study (City of San Diego 2008), the slopes in the University CPU area are underlain by landslides, Scripps Formations and Ardath Shale with neutral, adverse, and favorable structure (Geologic Hazard Category 21, 22, 25, 26, and 54). Since there are landslides on slopes with neutral and favorable geologic structure, all slopes underlain by the Scripps Formation, and Ardath Shale should be considered potentially unstable. The tops of the slopes are mapped as being at low to moderate risk for landsliding (Hazard Category 53 and 54). The slopes should be considered potentially unstable. Buildings or infrastructure older than 1985 within 50 feet of the tops of natural slopes may have been designed without consideration of slope stability (this area is in general agreement with Hazard Category 53; City of San Diego 2008). Additions of new building loads in these locations may not meet current City standards for slope stability.

As part of the Uptown CPU PEIR's Geotechnical Report, it was determined that the majority of the Uptown Community Planning area is mapped as Geologic Hazard Category 52, characterized as low risk with favorable geologic structure. Other smaller hazard categories are mapped within the Uptown Community Plan CPU area with low to moderate risk. No large landslides are mapped in the Uptown Community Planning area; however, small surficial instability could be present on steep slopes. Areas of known and potential, non-conforming slopes (i.e., slopes steeper than 2:1 horizontal to vertical), are generally along Interstates 5 and 8, in Reynard Canyon, Maple Canyon, Arroyo Drive, and Washington Street.

#### **4.6.1.4 Soil Erosion, Expansive Soils, and Settlement or Subsidence**

Expansive soils are characterized by significant volume changes (shrink or swell) due to variations in moisture content. Expansion of the soil may result in unacceptable settlement or heave of structures or concrete slabs supported on grade. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors. Soils with a relatively high fines content (clays dominantly) are generally considered

expansive or potentially expansive. These soils may be found in areas underlain by the Friars Formation and in areas underlain by young colluvial or undocumented fill soils.

The University CPU area is almost fully developed with landscaping, buildings, and paving. Areas not developed contain dedicated open space areas that are well covered with natural vegetation. Most of the community is located on a mesa where gradients are very low. As a result, the potential for soil erosion is very low.

As detailed in Appendix E, expansion of the soil may result in unacceptable settlement or heave of structures or concrete slabs supported on grade. Changes in soil moisture content can result from precipitation, landscape irrigation, utility leakage, roof drainage, perched groundwater, drought, or other factors. Soils with a relatively high fines content (clays dominantly) are generally considered expansive or potentially expansive. Very old paralic deposits, typically on mesa tops, typically have a thick clayey weathering profile that can be expansive. Previous grading activities have mixed the natural soils with the granular formational materials and will affect the potential for expansive soil greatly. Expansive and corrosive soil may impact all of the University CPU area.

Subsidence typically occurs when the extraction of fluids (water or oil) causes the reservoir rock to consolidate. Water extraction is minimal in the University CPU area and the geologic materials are well consolidated. Subsidence is not a hazard in the University CPU area. Settlement of unconsolidated soil (fill or alluvium) may occur locally where new loads are imposed on previously uncompacted fill, compacted fill on unconsolidated material such as weathered very old paralic deposits or alluvium, or unconsolidated alluvium.

The permeability of soil within 10 feet of the current ground surface can affect the design of storm water infiltration devices. The soil permeability in the University CPU area is highly variable. Well consolidated and frequently cemented very old paralic deposits that are impermeable may be encountered at very shallow depths. As a result, the use of typical shallow infiltration systems may be problematic in some locations. Cemented very old paralic deposits often create difficult excavation conditions which may increase grading or excavation costs.

As part of the Uptown CPU PEIR's Geotechnical Report (Appendix E), it was determined that highly expansive Normal Heights Mudstone is mapped in the northeastern portion of the Uptown Community Planning area. Mudstone can be highly expansive and within the Uptown Community Planning area could range from a few feet thick to approximately 10 feet thick, or greater, in localized areas. The presence of highly expansive materials, especially if near finished proposed grade, is potentially damaging to foundations surface improvements such as sidewalks and pavements.

#### **4.6.1.5 Paleontological Resources**

Paleontological resources, also referred to as fossils, are the remains and/or traces of prehistoric plant and animal life exclusive of human remains or artifacts. Fossil remains such as bones, teeth, shells, and wood are found in the geologic deposits, or formations, in which they were originally buried. Paleontological resources represent limited, non-renewable, and sensitive scientific and educational resources.

The potential for fossil remains at a location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are buried. Geologic formations possess a specific paleontological resource potential wherever the formation occurs based on discoveries made elsewhere in that particular formation.

The City is underlain by numerous distinct geologic units (i.e., formations) that record portions of the past 450 million years of Earth's history. Over this period of time, the relationship between land and sea has fluctuated drastically, such that today there are ancient marine rocks preserved up to elevations about 900 feet above sea level. In general, time periods late in geologic history are better represented than periods further back in time because the younger rocks are less likely to have been eroded away or metamorphosed. This is the case in San Diego County where a general overview of the geologic setting provides a basis for reasonably predicting the location of paleontological resources. In the City, the geologic record is mostly complete for parts of the past 75 million years, represented by the Cretaceous Period, the Eocene, Oligocene, and Pliocene Epochs of the Tertiary Period, and the Pleistocene Epoch of the Quaternary Period.

### **a. Paleontological Resources Sensitivity**

The City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022) and General Grading Guidelines for Paleontological Resources in the Land Development Manual establish a Paleontological Monitoring Determination Matrix provided in Table 4.6-2, which identifies geological deposits, formations, and rock units in the City and describes the potential fossil localities and sensitivity ratings associated with each formation. The paleontological resources sensitivity ratings are defined as:

- **High Sensitivity.** High sensitivity is assigned to geologic formations known to contain paleontological localities with rare, well-preserved, critical fossil materials for stratigraphic or paleoenvironmental interpretation, and fossils providing important information about the paleobiology and evolutionary history (phylogeny) of animal and plant groups. Generally speaking, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.
- **Moderate Sensitivity.** Moderate sensitivity is assigned to geologic formations known to contain paleontological localities with poorly preserved, common elsewhere, or stratigraphically unimportant fossil material. The moderate sensitivity category is also applied to geologic formations judged to have a strong, but unproven potential for producing important fossil remains.
- **Low Sensitivity.** Low sensitivity is assigned to geologic formations that, based on their relative youthful age and/or high-energy depositional history, are judged unlikely to produce important fossil remains. Typically, low sensitivity formations produce invertebrate fossil remains in low abundance.
- **Zero Sensitivity.** Zero sensitivity is assigned to geologic formations that are entirely igneous in origin and therefore have no potential for producing fossil remains, or to artificial fill materials that lose the stratigraphic/geologic context of any contained organic remains (e.g., fossils).

**Table 4.6-2  
Paleontological Monitoring Determination Matrix**

Geological Deposit/Formation/ Rock Unit	Potential Fossil Localities	Sensitivity Rating <sup>1</sup>
Alluvium (Qsw, Qal, or Qls)	All communities where this unit occurs	Low
Ardath Shale (Ta)	All communities where this unit occurs	High
Bay Point/Marine Terrace (Qbp) <sup>2</sup>	All communities where this unit occurs	High
Cabrillo Formation (Kcs)	All communities where this unit occurs	Moderate
Delmar Formation (Td)	All communities where this unit occurs	High
Friars Formation (Tf)	All communities where this unit occurs	High
Granite/Plutonic (Kg)	All communities where this unit occurs	Zero
Lindavista Formation (Qln, Qlb) <sup>2</sup>	A. Mira Mesa/Tierrasanta B. All other areas	A. High B. Moderate
Lusardi Formation (Kl)	A. Black Mountain Ranch/Lusardi Canyon Poway/Rancho Santa Fe B. All other areas	A. High B. Moderate
Mission Valley Formation (Tmv)	All communities where this unit occurs	High
Mt. Soledad Formation (Tm, Tmss, Tmssc)	A. Rose Canyon B. All other areas	A. High B. Moderate
Otay Formation (To)	All communities where this unit occurs	High
Point Loma Formation (Kp)	All communities where this unit occurs	High
Pomerado Conglomerate (Tp)	A. Scripps Ranch/Tierrasanta B. All other areas	High
River/Stream Terrace Deposits (Qt)	A. Southeastern/Chollas Valley/Fairbanks Ranch/ Skyline/Paradise Hills/Otay Mesa, Nestor/San Ysidro B. All other areas	A. Moderate B. Low
San Diego Formation (Qsd)	All communities where this unit occurs	High
Santiago Peak Volcanics (Jsp) A. Metasedimentary B. Metavolcanic	A. Black Mountain Ranch/La Jolla Valley, Fairbanks Ranch/Mira Mesa/ Peñasquitos B. All other areas	A. Moderate B. Zero
Scripps Formation (Tsd)	All communities where this unit occurs	High
Stadium Conglomerate (Tst)	All communities where this unit occurs	High
Sweetwater Formation	All communities where this unit occurs	High
Torrey Sandstone (Tf)	A. Black Mountain Ranch/Carmel Valley B. All other areas	A. High B. Low

**<sup>1</sup>Sensitivity Rating Grading Thresholds for Required Monitoring**

High = > 1,000 cubic yards and 10 feet+ deep

Moderate = > 2,000 cubic yards and 10 feet+ deep

Zero – Low = Monitoring not required

<sup>2</sup>Baypoint – Broadly correlative with Qop 1-8 of Kennedy and Tan (2008) new mapping nomenclature.

<sup>3</sup>Lindavista – Broadly correlative with Qvop 1-13 of Kennedy and Tan (2008) new mapping nomenclature.

**NOTES:**

- Monitoring is always required when grading on a fossil recovery site or near a fossil recovery site in the same geologic deposit/formation/rock unit as the project site as indicated on the Kennedy Maps.
- Monitoring may be required for shallow grading (i.e., <10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface.
- Monitoring is not required when grading documented or undocumented artificial fill.

SOURCE: City of San Diego CEQA Significance Determination Thresholds (2022)

Significant impacts to paleontological resources are most often mitigated by the implementation of a monitoring program carried out under the supervision of a qualified paleontologist including preconstruction meetings as well as on-site inspections of active excavations.

## **4.6.2 Regulatory Setting**

### **4.6.2.1 State Regulations**

#### **a. Earthquake Fault Zoning Act (Alquist-Priolo Act)**

The State of California Alquist-Priolo Earthquake Fault Zoning Act (1972) was established to mitigate the hazard of surface faulting to structures for human occupancy. Pursuant to the act, the State Geologist has established regulatory zones (known as earthquake fault zones) around surface traces of active faults. These have been mapped for affected cities, including the City. Application for a development permit for any project within a delineated earthquake fault zone shall be accompanied by a geologic report, prepared by a geologist registered in the state of California, which addresses that is directed to the problem of potential surface fault displacement through a project site.

#### **b. California Building Code**

The California Building Code (CBC), also known as the California Building Standards Code, is included in Title 24 of the California Code of Regulations (CCR). The CBC incorporates the International Building Code, a model building code adopted across the United States. Through the CBC, the state provides a minimum standard for building design and construction. The CBC contains specific requirements for seismic safety, foundations, retaining walls, and site demolition. The CBC also includes provisions for grading, including drainage and erosion control. The CBC has been amended and adopted by reference in Chapter 14, Article 5 of the San Diego Municipal Code (SDMC), which is the building regulations for the City. The CBC provides minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC has provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground shaking with specified probability of occurring at a site.

#### **c. California Seismic Hazards Mapping Act**

The Seismic Hazards Mapping Act (Public Resources Code Sections 2690-2699.6), passed in 1990, addresses non-surface fault rupture earthquake hazards, including liquefaction and seismically induced landslides. Under this act, seismic hazard zones are to be mapped by the State Geologist to assist local governments in land use planning. The act states that it is a necessity to identify and map seismic hazards so that cities and counties can adequately prepare the safety element of their general plan as well as encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. According to Public Resources Code Section 2697(a), cities and counties shall require a geotechnical report defining and delineating any

seismic hazard related to a project, prior to the approval of any project located in a seismic hazard zone.

#### **d. California Public Resources Code Section 5097.5**

Public Resources Code Section 5097.5 states that a person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

### **4.6.2.2 Local Regulations**

#### **a. City of San Diego Seismic Safety Study**

The City's Seismic Safety Study Geologic Hazards and Faults maps document the known and suspected geologic hazards and faults in the region. The maps show potential hazards and rates them by relative risk, on a scale from nominal to high. The Seismic Safety Study is intended as a tool to determine the level of geotechnical review to be required by the City for planning, development, or building permits. These are generalized maps, and site-specific geologic/geotechnical investigations may be necessary for proposed development or construction. The SDMC Section 145.1803 describes when a geotechnical investigation is required, and City's Development Services Department Information Bulletin 515 (City of San Diego 2016) describes the minimum submittal requirements for geotechnical and geological reports that may be required for development permits, subdivision approvals, or grading permits.

#### **b. San Diego County Multi-Jurisdictional Hazard Mitigation Plan**

The 2023 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP; City of San Diego 2023) was prepared to comply with the Disaster Mitigation Act of 2000 to increase disaster planning funding. It is intended to educate the public, help serve as a decision-making tool, supplement and enhance local policies regarding disaster planning, and improve multi-jurisdiction coordination.

The MJHMP identifies coastal storms/erosion/tsunamis, dam failure, earthquakes, and landslides among the top hazards in the City due to the potential loss of life, injuries, and damage to property, as well as the significance in the disruption of services. The MJHMP: City of San Diego Annex includes six goals for the City, including the following related to geologic and seismic hazards:

- Goal 1.** Promote public understanding, support, and demand for hazard mitigation.
- Goal 2.** Improve hazard mitigation coordination and communication with federal, state, local, and tribal governments.



- Goal 3.** Reduce the possibility of damage and losses to existing assets, particularly people, critical facilities/infrastructure, and State-owned facilities, due to wildfire/structure fire, coastal storms/erosion/tsunami, landslide, hazardous materials, and other manmade hazards.
- Goal 4.** Reduce the possibility of damage and losses to existing assets, particularly people, critical facilities/infrastructure, and State-owned facilities, due to severe weather (e.g., El Niño storms, thunderstorms, lightning, tsunami, and extreme heat and drought).
- Goal 5.** Reduce the possibility of damage and losses to existing assets, particularly people, critical facilities/infrastructure and State-owned facilities, due to earthquake and dam failure.

### c. City of San Diego Municipal Code

The City's LDC sets forth the regulations that apply to the development of land in the City, and comprises Chapters 11, 12, 13, 14, and 15 of the SDMC. Per SDMC Section 129.0602, grading permits are required for any grading within open space easements or City-owned open space; any grading required for the restoration of unauthorized grading; any grading within the Special Flood Hazard Area; any grading in accordance with a Grading Permit required as a condition of a development permit to assure compliance with the development permit conditions; any grading that includes (1) excavation or fill that results in a slope with a gradient of 25 percent or greater (four horizontal feet to one vertical foot) and for which the depth or height at any point is more than five feet measured vertically at the face of the slope from the top of the slope to the bottom of the slope, (2) excavation or fill for which the depth or height at any point from the lowest grade to the highest grade at any time during the proposed grading is more than five feet measured vertically, (3) grading that creates manufactured slopes at a gradient exceeding that specified in SDMC Section 142.0133, (4) grading for which the graded area is more than one acre, (5) grading that adversely affects the existing drainage pattern by altering the drainage pattern, concentrating runoff, increasing the quantity of runoff, or increasing the velocity of runoff to adjacent properties, (6) placing fill material that contains more than five percent, by volume, of broken concrete, asphalt, masonry, or construction debris, (7) placing fill material that has any piece larger than 12 inches in any direction, or (8) grading that includes blasting or other use of explosives; and any grading work on a property that contains a historical resource as described in SDMC Section 143.0210.

#### ***City of San Diego Grading Regulations***

The City's Grading Regulations (SDMC Section 142.0101, et seq.) provides the City's grading regulations. The purpose of the Grading Regulations is to address slope stability, protection of property, erosion control, water quality, landform preservation, paleontological resources preservation, and to protect the protection of public health, safety, and welfare of persons, property, and the environment. To reduce slide danger and erosion hazards, a grading permit must be obtained for all projects involving the process of moving soil and rock from one location to another. The Grading Regulations are designed in part to assure that development in earthquake- or

landslide-prone areas does not threaten human life or property. Specific grading regulations relevant to the project include the following:

- SDMC Section 142.0411 requires the implementation of measures that ensure excessive erosion is avoided, such as implementing immediate post-grading slope revegetation or hydroseeding with erosion-resistant species to ensure coverage of the slopes prior to the next rainy season in accordance with Table 142-04F, Landscape Regulations. All required revegetation and erosion control is required to be completed within 90 calendar days of the completion of grading or disturbance (SDMC Section 142.0411[c]).
- SDMC Section 142.0151 includes requirements to ensure protection of paleontological resources, as follows:
  - (a) Paleontological resources monitoring shall be required in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:
    - (1) Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or
    - (2) Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in a Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
    - (3) Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.
  - (b) If paleontological resources, as defined in the General Grading Guidelines for Paleontological Resources, are discovered during grading, notwithstanding Section 142.0151(a), all grading in the area of discovery shall cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources.

#### **d. City of San Diego Land Development Manual**

The City's Land Development Manual Appendix P identifies general grading guidelines for paleontological resources, including standard monitoring requirements. Per the City's General Grading Guidelines, the City requires the placement of standard monitoring requirements on grading plans when needed consistent with SDMC Section 142.0151.

#### **e. City of San Diego Building Regulations**

The City's Building Regulations (SDMC Chapter 14, Article 5) regulate the construction of applicable facilities and encompass (and formally adopt) associated elements of the CBC. Specifically, this includes regulations related to the construction, alteration, replacement, repair, maintenance, moving, removal, demolition, occupancy, and use of any privately owned building or structure or any appurtenances connected or attached to such buildings or structures within the City, except work

located primarily in a public way, public utility towers and poles, mechanical equipment not specifically regulated in the CBC, and hydraulic flood control structures.

## f. City of San Diego General Plan

The goals of the Seismic Safety section of the Public Facilities, Services, and Safety Element of the General Plan are the protection of public health and safety through abated structural hazards and mitigated risks posed by seismic hazards and development that avoids inappropriate land uses in identified seismic risk areas. The policies of the Seismic Safety section of the Public Facilities, Services, and Safety Element are intended to protect public health and safety through the application of effective seismic, geologic, and structural considerations. The Public Facilities, Services, and Safety Element of the General Plan (City of San Diego 2024) identifies the following policies related to seismic, geologic, and structural considerations:

Policy PF-Q.1: Protect public health and safety through the application of effective seismic, geologic, and structural considerations.

- a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the CEQA document accompanying a discretionary action.
- b. Maintain updated citywide maps showing faults, geologic hazards, and land use capabilities, and related studies used to determine suitable land uses.
- c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected.
- d. Utilize the findings of a beach and bluff erosion survey to determine the appropriate rate and amount of coastline modification permissible in the City.
- e. Coordinate with other jurisdictions to establish and maintain a geologic “data bank” for the San Diego area.
- f. Regularly review local lifeline utility systems to ascertain their vulnerability to disruption caused by seismic or geologic hazards and implement measures to reduce any vulnerability.
- g. Adhere to state laws pertaining to seismic and geologic hazards.

Policy PF-Q.2(b): Continue to consult with qualified geologists and seismologists to review geologic and seismic studies submitted to the City as project requirements.

### 4.6.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to geology and soils are based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards?
- 2) Would the project result in a substantial increase in wind or water erosion of soils, either on or off the site?
- 3) Would the project be located in a geologic unit or soil that is unstable, or would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?
- 4) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

### 4.6.4 Impact Analysis

#### Issue 1 Geologic Hazards

*Would the project expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, or similar hazards?*

Future development associated with the implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU could result in the exposure of people, structures, and infrastructure to seismic hazards. As shown in Figures 4.6-3a through 4.6-3e, portions of the Blueprint SD Initiative's Climate Smart Village Areas are delineated within the active Alquist-Priolo Earthquake Fault Zone, which is defined by the City's Seismic Safety Study (City of San Diego 2008) as having a high-risk factor. Portions of the Blueprint SD Initiative's Climate Smart Village Areas are also within the Downtown Special Fault Zone which is defined by the City's Seismic Safety Study (City of San Diego 2008) as having a moderate and high-risk factor. The University CPU area and the Hillcrest FPA area are not located within any active fault zones. However, both areas are subject to potential ground shaking caused by activity along faults.

The project areas could be subject to potential geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards. These geologic hazards could expose residences, occupants, visitors, and structures, among others, to substantial adverse effects, including the risk of loss, injury, or death.

Future development located in fault buffer zones would be required to prepare a site-specific geotechnical investigation that addresses surface fault-rupture hazards consistent with SDMC 145.1803(a)(2). More specifically, Appendix E of the City's Guidelines for Geotechnical Reports indicates that fault studies would be needed for all new development and projects where

repurposing existing occupancy and use would occur. Those studies would need to be prepared in accordance with the Alquist-Priolo Earthquake Zoning Act, California Geological Survey Note 49 that requires trenching or borings to evaluate site conditions. CBC requirements state that new buildings cannot be located over active faults and setbacks (typically 50 feet) must be provided. These requirements would be implemented during the ministerial level building permit review associated with future development.

The City's Building Regulations include regulations for structural design intended to reduce the impact of earthquake shaking on buildings to an acceptable level of risk. The seismic design of future projects within the project areas would be evaluated in accordance with the CBC and City standards to ensure a reduced risk to future structures from strong seismic ground shaking. Additionally, SDMC Section 145.1803(a)(2) states that no building permit shall be issued for construction where the geotechnical investigation report establishes that the construction of buildings or structures would be unsafe because of geologic hazards. All new development and redevelopment within the project areas would be required to comply with the SDMC and the CBC, which include design criteria for seismic loading and other geologic hazards and require that a geotechnical investigation be conducted for all new structures, additions to existing structures, or whenever the occupancy classification of a building changes to a higher relative hazard category (SDMC Section 145.1803).

Specific design features of future projects are not known at this program level of review. However, future development located over a delineated earthquake fault zone would be required to conform with state and local regulatory standards and would be required to prepare a site-specific geologic report and fault study that provides provisions to reduce the potential impacts associated with seismic hazards. Where geotechnical investigations identify potential geologic hazards, including potential for surface fault rupture, liquefaction, landslides, mudslides, or ground failure, the reports are required to contain appropriate recommendations for hazard mitigation to be incorporated into the design of the project before issuance of a building permit. No building permit may be issued for construction where the geotechnical investigation report establishes that construction of buildings or structures would be unsafe because of the geologic hazards.

Thus, while the project areas could be subject to seismic events and potential hazards associated with earthquakes, landslides, mudslides, ground failure, or similar hazards, these potential impacts would be reduced to a less than significant level through regulatory compliance with seismic requirements in the CBC, SDMC, and implementation of site-specific geotechnical report recommendations associated with future development. Liquefaction and landslide impacts are further addressed under Issue 3 below. Impacts would be less than significant.

## Issue 2 Soil Erosion

*Would the project result in a substantial increase in wind or water erosion of soils, either on or off the site?*

During future construction and operations associated with future development within the project areas, some soil erosion could occur if soil is left exposed to the elements without proper protection. Erosion and sedimentation are a function of rainfall, runoff, topographic conditions, ground cover, and various soil characteristics such as grain size and permeability. Bare and poorly

vegetated areas are prone to soil erosion and sediment being transported by surface waters and drainages. Future development within the project areas could involve construction and grading activities that could temporarily expose disturbed soils and increase soil erosion from water and wind. As development occurs, paved areas and landscaping may be removed, thereby exposing disturbed soils to potential runoff and erosion during construction if protective measures are not taken.

SDMC Section 142.0146 requires grading work to incorporate erosion and siltation control measures in accordance with SDMC Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the Land Development Manual. The regulations prohibit sediment and pollutants from leaving the worksite and require the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures. Controls include measures outlined in SDMC Chapter 14, Article 2, Division 2 (Storm Water Runoff Control and Drainage Regulations) that address the development's potential erosion and sedimentation impacts.

Conformance to these mandated City grading requirements would ensure that future proposed grading and construction operations would avoid significant soil erosion impacts. Furthermore, any development involving clearing, grading, or excavation that causes soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, is subject to the National Pollutant Discharge Elimination System Construction Stormwater General Permit provisions. Additionally, ground disturbance of a certain size would trigger preparation of and compliance with an approved Storm Water Pollution Prevention Plan that would consider the full range of sediment and erosion control Best Management Practices, including any additional site-specific and seasonal conditions. Project compliance with National Pollutant Discharge Elimination System requirements would reduce the potential for substantial soil erosion from new development associated with the project. Impacts would be less than significant.

### Issue 3 Geologic Instability

*Would the project be located in a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?*

#### a. Landslide

Future development within project areas could be located on a geologic unit or soil that has a risk of landslides. As shown in Table 4.6-1, approximately 7 acres within the Blueprint SD Initiative's Climate Smart Village Areas have a high landslide risk and are defined by the City's Seismic Safety Study (City of San Diego 2008) as confirmed, known or highly suspected landslide areas. Moreover, approximately 435.6 acres of the Blueprint SD Initiative's Climate Smart Village Areas contain the potential for slope instability as detailed in Table 4.6-3. Additionally, approximately 14 acres within the Blueprint SD Initiative's Climate Smart Village Areas are located on generally unstable coastal bluffs as mapped by the City's Seismic Safety Study (City of San Diego 2008; see Table 4.6-1).

<b>Table 4.6-3 Potential Slope Instability within the Blueprint SD Initiative Climate Smart Village Areas<sup>1</sup></b>				
Potential Slope Instability – Geologic Hazard Category	Acres	Relative Risk		
		Low	Moderate	High
Ardath – Neutral or favorable geologic structure	162.5	X	X	
Ardath – Unfavorable geologic structure	12.5		X	
Friars – Unfavorable geologic structure	12.5		X	
Friars – Neutral or favorable geologic structure	123.4	X	X	
Otay, Sweetwater and others	124.7	X	X	
SOURCE: City of San Diego Seismic Safety Study (City of San Diego 2008)				
<sup>1</sup> Areas with a village propensity value between 7 and 14.				

Approximately 91 acres within the University CPU area have a high landslide risk and are defined by the City's Seismic Safety Study (City of San Diego 2008) as confirmed, known or highly suspected landslide areas and approximately 4 acres are assigned a moderate risk (see Table 4.6-1). Moreover, approximately 1,190 acres of the University CPU area contain the potential for slope instability as detailed in Table 4.6-4.

<b>Table 4.6-4 University CPU Area Potential Slope Instability</b>				
Potential Slope Instability – Geologic Hazard Category	Acres	Relative Risk		
		Low	Moderate	High
Ardath – Neutral or favorable geologic structure	1,109	X	X	
Ardath – Unfavorable geologic structure	64		X	
Friars – Neutral or favorable geologic structure	17	X	X	
SOURCE: City of San Diego Seismic Safety Study (2008).				

As part of the Uptown CPU PEIR's Geotechnical Report, it was determined that the majority of the Uptown Community Planning area is mapped as Geologic Hazard Category 52, characterized as low risk with favorable geologic structure. Other smaller hazard categories are mapped within the Uptown Community Planning area with low to moderate risk. No large landslides are mapped in the Uptown Community Planning area; however, small surficial instability could be present on steep slopes. Areas of known and potential non-conforming slopes (i.e., slopes steeper than 2:1 horizontal to vertical) are generally along Interstates 5 and 8, in Reynard Canyon, Maple Canyon, Arroyo Drive, and Washington Street.

Future development within the project areas would require a geotechnical investigation be prepared that specifically addresses slope stability if located on landslide-prone formations or slopes steeper than 25 percent (slope ratio of 4:1 horizontal to vertical; see SDMC Table 145.1803). Site-specific studies will be required to assess site-specific risks and hazards. Potential hazards associated with landslides, slope instability, and mudflows would be avoided through implementation of site-specific recommendations contained in a geotechnical report investigation as required by the CBC and SDMC. Therefore, the risk associated with landslides, slope instability, and mudflows would be less than significant.



## b. Liquefaction and Other Soil Stability Issues

According to the City's Seismic Safety Study (City of San Diego 2008) and as shown in Table 4.6-1, approximately 2,815 acres of the Blueprint SD Initiative's Climate Smart Village Areas and approximately 6 acres within the University CPU area are located on a geologic unit or soil that is mapped as having a high risk of liquefaction. As stated in Section 4.6.1.2c, the potential for liquefaction and seismically induced settlement in the Uptown Community Planning area, including the Hillcrest FPA area, is very low.

Other stability issues include lateral spreading and subsidence. As stated in Section 4.6.1.4, subsidence is not a hazard in the University CPU area and as stated in Section 4.6.3c, Liquefaction prone soil in the University CPU area is confined to existing canyon bottoms and Sorrento Valley which are not likely to undergo lateral spreading.

Pursuant to SDMC Section 145.1803, new developments located within liquefiable areas are required to prepare a site-specific geotechnical report to determine the level of risk and hazard and identify design features to address life and safety concerns. Future development within the project areas would be required to be constructed in accordance with the SDMC and CBC, and to implement any of the recommendations in the site-specific geotechnical report. With implementation of existing SDMC and CBC requirements and geotechnical recommendations, impacts related to liquefaction and other soil stability issues would be less than significant. Future development within the project areas would be required to be constructed in accordance with the SDMC and CBC and would be required to prepare a site-specific geotechnical report and implement any recommendations within the report. Thus, impacts related to liquefaction, lateral spreading, or subsidence would be less than significant.

## c. Collapsible Soils

Soils that undergo volumetric reduction due to wetting and inundation are considered collapsible soils. Such soils are typically found within alluvial deposits. Some fill soils also undergo collapse when wetted or inundated. As such, potentially collapsible soils are anticipated within those project areas that contain younger alluvium (Qya) and artificial fill (af). The primary hazard associated with collapsible soils is settlement-induced damage.

Potential hazards associated with collapsible soils would be addressed through site-specific recommendations contained within geotechnical investigations as required by the CBC and SDMC. These hazards would be avoided by identifying and delineating the limits of these soils during the geotechnical investigation for specific structures, and by removing and recompacting the soils in question or founding the proposed structure on a foundation system designed to protect the proposed structure from settlement-induced damage. Thus, impacts related to collapsible soils would be less than significant.

## d. Expansive Soils

Future development in the project areas could be located within areas with expansive soils. As part of the geotechnical investigation required by SDMC Section 145.1803(a)(2) associated with future

development, evaluation of the suitability of soils for development would occur as a requirement of grading permits. If expansive soils are found at a particular project site, the development would be required to comply with the requirements of the CBC and SDMC related to expansive soils. Compliance with existing regulations in addition to implementation of site-specific recommendations in the geotechnical investigation would ensure that impacts associated with expansive soils are reduced to a less than significant level.

## Issue 4 Paleontological Resource and Unique Geologic Features

*Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

Future development within the project areas could be located in areas containing paleontological resources and unique geologic features. Grading into geologic formations with a moderate or high paleontological resource potential could destroy paleontological resources and the scientific information available from the recovery of such resources. Similarly, unique geologic features could be adversely affected if destroyed due to site development.

Grading associated with future development resulting from the project involving excavation that exceeds the criteria noted in SDMC Section 142.0151 (i.e., grading in excess of 1,000 cubic yards, and extending to a depth of 10 feet or greater into high sensitivity formations, or grading in excess of 2,000 cubic yards, and extending to a depth of 10 feet or greater into moderate sensitivity formations) could potentially expose undisturbed formations and associated fossil remains. These development projects could destroy paleontological resources if the fossil remains are not recovered and salvaged. In addition, future projects proposing shallow grading where formations are exposed and where fossil localities have already been identified could also result in a significant impact. Based on the location of the project areas within existing urban areas that have been subject to prior grading for development, much of the project areas are likely to be underlain by artificial fill with no potential to uncover paleontological resources. However, some project areas may have high and/or moderate resource sensitivity where fossils could be uncovered during future construction-related activities. Pursuant to SDMC Section 142.0151, paleontological monitoring would be required in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:

- (1) Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or
- (2) Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in a Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
- (3) Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

If paleontological resources are discovered during grading, the SDMC requires that grading in the area of discovery cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological

Resources. The General Grading Guidelines for Paleontological Resources are contained within Appendix P of the Land Development Manual. These guidelines require the placement of a standard monitoring requirement on all grading plans to ensure paleontological monitoring is implemented and defines the steps to be taken to ensure significant paleontological resources are recovered, recorded, and curated, in the event resources are encountered. Implementation of the City's Grading Regulations and General Grading Guidelines for Paleontological Resources, as required by the SDMC and applicable to all development, would ensure that impacts resulting from future construction-related activities would be less than significant.

## **Cumulative Impacts**

Cumulative impacts related to geologic hazards due to potential growth and development within the project areas would be less than significant with adherence to the existing local and state regulatory framework as well as implementation of project-level recommendations included in site-specific geotechnical investigations required under the CBC and SDMC. Development of the project areas would not compound or worsen potential geologic hazards as geologic hazard conditions are site-specific and do not compound or increase in combination with projected development elsewhere in the area. Thus, as each individual development with the potential for geologic hazards would be required to prepare a site-specific geotechnical study and comply with the remedial measures identified in the study, as required by the SDMC and CBC, cumulative impacts related to geologic hazards would be avoided.

Application of SDMC Section 142.0151, which requires paleontological monitoring in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual, would ensure cumulative impacts to paleontological resources are avoided. Overall cumulative impacts related to geology, soils, and paleontology would be less than significant.

## **4.6.5 Significance of Impacts**

### **4.6.5.1 Geologic Hazards**

Implementation of the project would not have direct or indirect significant environmental impacts to seismic hazards because future development would be required to comply with the SDMC and CBC. This regulatory framework includes a requirement for site-specific geotechnical investigations to identify potential geologic hazards or concerns that would need to be addressed during grading and/or construction of a specific development project. Adherence to the SDMC grading regulations and construction requirements and implementation of recommendations contained within required site-specific geotechnical studies would preclude significant impacts related to geologic hazards. Thus, impacts would be less than significant.

### **4.6.5.2 Soil Erosion**

Implementation of the project would result in less than significant impacts related to soil erosion and loss of topsoil. SDMC regulations prohibit sediment and pollutants from leaving the worksite and require the property owner to implement and maintain temporary and permanent erosion,

sedimentation, and water pollution control measures. Conformance to mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Thus, impacts would be less than significant.

### **4.6.5.3 Geologic Instability**

Future development within the project areas would be required to be constructed in accordance with the SDMC and CBC and would be required to prepare a site-specific geotechnical report and implement any recommendations within the report. Thus, impacts related to landslides, lateral spreading, subsidence, liquefaction, or collapsible or expansive soils would be less than significant.

### **4.6.5.4 Paleontological Resources and Unique Geologic Features**

Required compliance with SDMC Section 142.0151 would ensure paleontological monitoring is required during grading in accordance with the General Grading Guidelines for Paleontological Resources in the City's Land Development Manual. With implementation of these SDMC requirements during grading, impacts to paleontological resources and unique geologic features would be less than significant.

## **4.6.6 Mitigation, Monitoring, and Reporting**

All impacts related to geology and soils would be less than significant; no mitigation is required.

## 4.7 Greenhouse Gas Emissions

This section analyzes the potential for significant impacts related to greenhouse gas (GHG) emissions that could result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (LCP) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC Land Development Code, and associated discretionary actions.

Issues addressed in this section include potential conflicts with the environmental goals of the City’s General Plan and the City’s 2022 Climate Action Plan (CAP). This section references a March 12, 2024 memo to the City regarding Making Progress Towards Mode Share Goals (Appendix N).

### 4.7.1 Existing Conditions

The City, including the University CPU area and the Hillcrest FPA area, is currently a source of anthropogenic GHG emissions, with emissions generated by vehicular traffic and by the energy use, area sources, water use, and solid waste disposal practices of existing development.

#### 4.7.1.1 State GHG Inventory

According to California’s 2000–2020 GHG emissions inventory, California emitted 369.2 million metric tons of carbon dioxide equivalent (MMT CO<sub>2</sub>E) in 2020, including emissions resulting from out-of-state electrical generation (California Air Resources Board [CARB] 2022a). The sources of GHG emissions in California include transportation, industrial uses, electric power production from both in-state and out-of-state sources, commercial and residential uses, agriculture, high-Global Warming Potential (GWP) substances, and recycling and waste. The California GHG emission source categories (as defined in CARB’s 2008 Scoping Plan) and their relative contributions in 2020 are presented in Table 4.7-1.

Table 4.7-1 Greenhouse Gas Emissions Sources in California		
Source Category	Annual GHG Emissions (MMT CO <sub>2</sub> e)	Percent of Total
Transportation	135.8	36.8
Industrial uses	73.3	19.9
Electricity Generation <sup>a</sup>	59.5	16.1
Commercial and Residential	38.7	10.5
Agriculture	31.6	8.6
High GWP substances	21.3	5.8
Recycling and waste	8.9	2.4
<b>Total</b>	<b>369.2</b>	<b>100.0</b>

SOURCE: CARB 2022a  
NOTES: GHG = greenhouse gas; GWP = global warming potential; MMT CO<sub>2</sub>e = million metric tons of carbon dioxide equivalent.  
Emissions reflect 2020 California GHG inventory.  
Totals may not sum due to rounding.  
<sup>a</sup>Includes emissions associated with imported electricity, which account for 18.6 MMT CO<sub>2</sub>e.

### 4.7.1.2 Regional GHG Inventory

A San Diego emissions inventory was prepared for total community-wide GHG emissions with adoption of the City's 2022 CAP. Table 4.7-2 summarizes the sources and quantities of 2019 community emissions. The largest source of emissions is on-road transportation, followed by electricity, natural gas, solid waste, off-road transportation, water, and wastewater.

Table 4.7-2 City of San Diego GHG Emissions in 2019		
Sector	2019 GHG Emissions (MT CO <sub>2</sub> E)	Distribution (%)
On-Road Transportation <sup>1</sup>	5,805,000	55%
Electricity	2,375,000	23%
Natural Gas	1,911,000	18%
Solid Waste	277,000	3%
Off-Road Transportation	70,000	1%
Water	68,000	1%
Wastewater	26,000	0.20%
<b>TOTAL</b>	<b>10,532,000</b>	<b>100%</b>

SOURCE: City of San Diego 2022a  
Sums may not add up to totals due to rounding.  
<sup>1</sup>2019 vehicle miles traveled (VMT) are based on 2016 VMT adjusted to account for regional VMT growth, as reflected in the California Highway Performance Monitoring System from 2017 to 2019. 2016 VMT is from the San Diego Association of Governments' Series 14 base year in the draft 2021 Regional Plan and activity-based model (ABM2+).

## 4.7.2 Regulatory Setting

### 4.7.2.1 Federal Regulations

#### a. Corporate Average Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standards determine the fuel efficiency of certain vehicle classes in the U.S. The first phase of the program applied to passenger cars, new light-duty trucks, and medium-duty passenger cars with model years 2012 through 2016 and required these vehicles to achieve a standard equivalent to 35.5 miles per gallon. The second phase of the program applies to model years 2017 through 2025 and increased the standards to 54.5 miles per gallon. Separate standards were also established for medium- and heavy-duty vehicles. The first phase applied to model years 2014 through 2018 and the second phase applies to model years 2018 through 2027. With improved gas mileage, fewer gallons of transportation fuel would be combusted to travel the same distance, thereby reducing nationwide GHG emissions associated with vehicle travel.

### 4.7.2.2 State Regulations

#### a. Executive Order S-3-05 – Statewide GHG Emission Targets

Executive Order (EO) S-3-05, signed on June 1, 2005, established the following GHG emission reduction targets for the state:

- By 2010, reduce GHG emissions to 2000 levels;
- By 2020 reduce GHG emissions to 1990 levels; and
- By 2050 reduce GHG emissions to 80 percent below 1990 levels.

EO S-3-05 also directs the Secretary of the California Environmental Protection Agency to oversee the efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets.

#### b. Executive Order B-30-15 – 2030 Statewide GHG Emission Goal

EO B-30-15, issued by Governor Brown on April 29, 2015, established an interim GHG emission reduction goal for the state: by 2030, reduce GHG emissions to 40 percent below 1990 levels. This EO also directed all state agencies with jurisdiction over GHG emitting sources to implement measures designed to achieve the new interim 2030 goal as well as the pre-existing long-term 2050 goal identified in EO S-3-05 (see discussion above). Additionally, EO B-30-15 directed CARB to update its Climate Change Scoping Plan (see discussion below) to address the 2030 goal.

#### c. California Global Warming Solutions Act

In response to EO S-3-05, the California Legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, and thereby enacted Sections 38500–38599 of the California



Health and Safety Code. AB 32 required CARB to establish an emissions cap and adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. AB 32 also required CARB to adopt a plan by January 1, 2009 indicating how emissions reductions would be achieved from significant GHG sources via regulations, market mechanisms, and other actions.

In 2008, CARB estimated that annual statewide GHG emissions were 427 MMT CO<sub>2</sub>E in 1990 and would reach 596 MMT CO<sub>2</sub>E by 2020 under a business as usual (BAU) condition (CARB 2008). To achieve the mandate of AB 32, CARB determined that a 169 MMT CO<sub>2</sub>E (or approximately 28.5 percent) reduction in BAU emissions was needed by 2020. In 2010, CARB prepared an updated 2020 forecast to account for the recession and slower forecasted growth. CARB determined that the economic downturn reduced the 2020 BAU by 55 MMT CO<sub>2</sub>E; as a result, achieving the 1990 emissions level by 2020 would require a reduction in GHG emissions of 21.7 (not 28.5) percent from the 2020 BAU. California has been on track to achieve 1990 levels and, based on the GHG inventories shown in Table 4.7-1, the state achieved the goal in 2017.

#### **d. Climate Change Scoping Plan**

As directed by AB 32, in 2008, CARB adopted the Climate Change Scoping Plan: A Framework for Change (Scoping Plan), which identifies the main strategies California will implement to achieve the GHG reductions necessary to reduce forecasted ~~business as usual~~ BAU emissions in 2020 to the state's historic 1990 emissions level (CARB 2008). In November 2017, CARB released the 2017 Climate Change Scoping Plan Update, The Strategy for Achieving California's 2030 Greenhouse Gas Target (2017 Scoping Plan; CARB 2017). The 2017 Scoping Plan identifies the state strategy for achieving the state's 2030 interim reduction target codified by Senate Bill (SB) 32. Measures under the 2017 Scoping Plan build on existing programs such as the Cap-and-Trade Program, Low Carbon Fuel Standard (LCFS), Advanced Clean Cars (ACC) program, Renewable Portfolio Standards (RPS), Sustainable Communities Strategy (SCS), and the Short-Lived Climate Pollutant Reduction Strategy. The 2022 Scoping Plan Update for Achieving Carbon Neutrality (2022 Scoping Plan; CARB 2022b) was adopted in December 2022. The 2022 Scoping Plan assesses the progress towards the 2030 GHG emissions reduction target identified in the 2017 Scoping Plan and lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. The 2022 Scoping Plan identifies strategies related to clean technology, energy development, natural and working lands, and others, and is designed to meet the state's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities.

#### **e. California Advanced Clean Cars Program**

The ACC program, adopted January 2012, combines the control of smog, soot-causing pollutants, and GHG emissions into a single coordinated package of requirements for model years 2015 through 2025. Accordingly, the ACC program coordinates the goals of AB 1493 (Pavley), low emission vehicle, zero emission vehicle, and Clean Fuels Outlet programs in order to lay the foundation for the commercialization and support of these ultra-clean vehicles.

AB 1493 directed CARB to adopt vehicle standards that lowered GHG emissions from passenger vehicles and light-duty trucks to the maximum extent technologically feasible, beginning with the

2009 model year. CARB has adopted amendments to its regulations that would enforce AB 1493 but provide vehicle manufacturers with new compliance flexibility.

CARB has also adopted a second phase of the Pavley regulations, originally termed “Pavley II” but now called the “Low Emission Vehicle III” (LEV III) Standards or ACC program, which covers model years 2017 to 2025. CARB estimates that LEV III will reduce vehicle GHG emissions by an additional 4.0 MMT CO<sub>2</sub>E for a 2.4 percent reduction over the first phase of Pavley regulations. On August 7, 2012, the final regulation for the adoption of LEV III became effective.

#### **f. Executive Order S-01-07 – Low Carbon Fuel Standard**

EO S-01-07 directed that a statewide goal be established to reduce the carbon intensity of California’s transportation fuels by at least 10 percent by 2020 through a LCFS. The LCFS promotes the use of GHG reducing transportation fuels (e.g., liquid biofuels, renewable natural gas, electricity, and hydrogen) through a declining carbon intensity standard. The LCFS went into effect on January 1, 2016.

#### **g. Senate Bill 375 – Regional Emissions Targets**

The Sustainable Communities and Climate Protection Act, SB 375, was signed in September 2008 and requires CARB to set regional targets for reducing passenger vehicle GHG emissions in accordance with the Scoping Plan measure described above. The purpose of SB 375 is to align regional transportation planning efforts, regional GHG reduction targets, and fair-share housing allocations under state housing law. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a SCS or Alternative Planning Strategy to address GHG reduction targets from cars and light-duty trucks in the context of that MPO’s Regional Transportation Plan. The San Diego Association of Governments (SANDAG) is the San Diego region’s MPO. In 2010, CARB set targets for the SANDAG region of a 7 percent reduction in GHG emissions per capita from automobiles and light-duty trucks compared to 2005 levels by 2020 and a 13 percent reduction by 2035. These targets are periodically reviewed and updated. CARB’s currently proposed targets for the SANDAG region are a reduction of 15 percent by 2020 and 21 percent by 2035.

#### **h. Renewables Portfolio Standard**

The RPS promotes diversification of the state’s electricity supply and decreased reliance on fossil fuel energy sources. Renewable energy includes (but is not limited to) wind, solar, geothermal, small hydroelectric, biomass, anaerobic digestion, and landfill gas. Originally adopted in 2002 with a goal to achieve a 20 percent renewable energy mix by 2020 (referred to as the “Initial RPS”), the goal has been accelerated and increased by EOs S-14-08 and S-21-09 to a goal of 33 percent by 2020. In April 2011, SB 2 (1X) codified California’s 33 percent RPS goal. In September 2015, the California Legislature passed SB 350, which increases California’s renewable energy mix goal to 50 percent by year 2030. SB 100 (2018) further increased the standard set by SB 350 establishing the RPS goal of 44 percent by the end of 2024, 52 percent by the end of 2027, and 60 percent by 2030.

### **i. Assembly Bill 341 – Solid Waste Diversion**

AB 341 amended prior diversion goals to require the state to divert 75 percent of the solid waste generated in the state from disposal by January 1, 2020. The bill also required businesses that meet specified thresholds in the bill to arrange for recycling services by January 1, 2012 and streamlined the amendment process for non-disposal facility elements, by allowing changes without review and comment from a local task force. Finally, the bill allows a solid waste facility to modify their existing permit, instead of having to undergo a permit revision, under specified circumstances.

### **j. California Code of Regulations, Title 24 – California Building Code**

The California Code of Regulations, Title 24, is referred to as the California Building Code (CBC). It consists of a compilation of several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, handicap accessibility, and so on. Of particular relevance to GHG reductions are the CBC's energy efficiency and green building standards as outlined below.

#### ***Title 24, Part 6 – Energy Efficiency Standards***

The California Code of Regulations Title 24, Part 6 is the California Energy Efficiency Standards for Residential and Nonresidential Buildings (also known as the California Energy Code). This code, originally enacted in 1978, establishes energy efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficient technologies and methodologies as they become available, and incentives in the form of rebates and tax breaks are provided on a sliding scale for buildings achieving energy efficiency above the minimum standards.

The current version of the Energy Code, known as the 2022 Energy Code, became effective January 1, 2023. The Energy Code provides mandatory energy-efficiency measures as well as voluntary tiers for increased energy efficiency. The 2022 standards increase on-site renewable energy generation from solar, increase electric load flexibility to support grid reliability, reduce emissions from newly constructed buildings, reduce air pollution for improved public health, and encourage adoption of environmentally beneficial efficient electric technologies. Overall, the 2022 amendments are expected to reduce electricity and fossil fuel natural gas usage when compared to the 2019 Energy Code requirements. It is anticipated that the 2022 Title 24 energy standards will result in a 10.9 percent increase in energy efficiency for multi-family uses over the previous code and a 14.2 percent increase in energy efficiency for single-family uses (California Energy Commission [CEC] 2021).

New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a Title 24 Compliance Report to the local building permit review authority and the CEC. The compliance reports must demonstrate a building's energy performance through use of CEC approved energy performance software that shows iterative increases in energy efficiency given the selection of various heating, ventilation, and air conditioning; sealing; glazing; insulation; and other components related to the building envelope.

### ***Title 24, Part 11 – California Green Building Standards***

The California Green Building Standards Code, referred to as CALGreen, was added to Title 24 as Part 11 first in 2009 as a voluntary code, which then became mandatory effective January 1, 2011 (as part of the 2010 CBC). The most recent 2022 CALGreen, which went into effect on January 1, 2023, institutes mandatory minimum environmental performance standards for all ground-up new construction of non-residential and residential structures. Local jurisdictions must enforce the minimum mandatory Green Building Standards and may adopt additional amendments for stricter requirements.

The mandatory standards require the following:

- Electric vehicle charging for new construction;
- Outdoor water use requirements as outlined in Model Water Efficient Landscape Ordinance emergency standards;
- Requirements for water conserving plumbing fixtures and fittings;
- 65 percent construction/demolition waste diverted from landfills;
- Infrastructure requirements for electric vehicle charging stations;
- Mandatory inspections of energy systems to ensure optimal working efficiency; and
- Requirements for low-pollutant emitting exterior and interior finish materials such as paints, carpets, vinyl flooring, and particleboards.

The 2022 CALGreen also includes residential and non-residential voluntary measures that go beyond the mandatory requirements. Compliance with the CALGreen water reduction requirements must be demonstrated through completion of water use reporting forms for new low-rise residential and non-residential buildings.

### **4.7.2.3 Local Regulations**

#### **a. Regional Transportation Plan/Sustainable Communities Strategy**

San Diego Forward: The 2021 Regional Plan (Regional Plan) is the 2050 Regional Transportation Plan (RTP) prepared by SANDAG and adopted in December 2021. The RTP establishes an implementation plan for how the region will grow over the next 30 years. Developed in accordance with SB 375, the RTP includes a SCS. An SCS demonstrates how the region will meet its GHG reduction targets through integrated land use, housing, and transportation planning. While the purpose of an SCS is to reduce GHG emissions due to mobile sources, it also results in a decrease in mobile sources of criteria pollutants. Enhanced public transit service combined with incentives for land use development that provides a better market for public transit will play an important role in the SCS.

The SCS focuses on the following five main strategies, referred to as the 5 Big Moves, that will result in a more efficient transportation system:

- Complete Corridors – Complete corridors act as the backbone of the entire regional transportation system, using technology, infrastructure improvements, pricing, and connectivity to support all forms of movement.
- Transit Leap – Transit leap offers people a network of high-capacity, high-speed, and high-frequency transit services that will incorporate new modes of transit while also providing improved existing services.
- Mobility Hubs – Mobility hubs are the centers of activity where a high concentration of people, destinations, and travel choices converge. They offer on-demand travel options and safe streets to enhance connections to high-quality transit while also making it easier for people to take short trips without needing a car.
- Flexible Fleets – Flexible fleets offer people a variety of on-demand, shared vehicles, including microtransit, bikeshare, scooters, and other modes of transportation, to connect them to transit and make travel easy within Mobility Hubs.
- Next Operating System (OS) – Next OS refers to an integrated digital platform that ties the transportation system together. Next OS enables the transportation system to be managed in real time so that people can be connected immediately to the modes of transportation that work best for them for any given situation and at any time.

The SCS land use pattern concentrates development into either Mobility Hubs or Smart Growth Opportunity Areas. The SCS land use pattern accommodates the 6th Cycle Regional Housing Needs Assessment allocations between 2020 and SCS target year 2035.

## **b. City of San Diego General Plan**

The City's General Plan sets forth a comprehensive, long-term plan for development within the City of San Diego. The General Plan implements the City of Villages strategy as part of its Strategic Framework, which aims to redirect development away from undeveloped lands and toward already urbanized areas and/or areas with conditions allowing the integration of housing, employment, civic, and transit uses. This development strategy mirrors regional planning and smart growth principles intended to preserve remaining open space and natural habitat and focus development within areas with available public infrastructure.

The Blueprint SD Initiative includes updates to the Conservation Element of the City's General Plan which contains policies to guide the conservation of resources that are fundamental components of the City's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. The purpose of this element is to help the City become an international model of sustainable development and conservation and to provide for the long-term conservation and sustainable management of the rich natural resources that help define the City's identity, contribute to its economy, and improve its quality of life.

The General Plan's Conservation Element includes goals and policies related to climate change including, but not limited to the following:

**Goal:** To reduce the City's overall carbon dioxide footprint by improving energy efficiency, increasing use of alternative modes of transportation, employing sustainable planning and design techniques, and providing environmentally sound waste management.

**Goal:** To be prepared for, adapt, and thrive in a changing climate.

**Goal:** To become a city that is an internal model of sustainable development and conservation.

**Policy CE-A.8:** Reduce construction and demolition waste in accordance with Public Facilities Element, Policy PF-1.2, or by renovating or adding on to existing buildings, rather than constructing new buildings.

**Policy CE-A.9:** Reuse building materials, use materials that have recycled content, or use materials that are derived from sustainable or rapidly renewable sources to the extent possible, through factors including:

- Scheduling time for deconstruction and recycling activities to take place during project demolition and construction phases;
- Using life cycle costing in decision-making for materials and construction techniques. Life cycle costing analyzes the costs and benefits over the life of a particular product, technology, or system;
- Removing code obstacles to using recycled materials in buildings and for construction; and
- Implementing effective economic incentives to recycle construction and demolition debris.

**Policy CE-I.4:** Maintain and promote water conservation and waste diversion projects to conserve energy.

**Policy CE-I.5:** Support the installation of photovoltaic panels, and other forms of renewable energy production.

- Seek funding to incorporate renewable energy alternatives in public buildings.
- Promote the use and installation of renewable energy alternatives in new and existing development.

**Policy CE-I.10:** Use renewable energy sources to generate energy to the extent feasible.

The City's California Environmental Quality Act (CEQA) Significance Determination Thresholds (City of San Diego 2022b) requires that plan- and policy-level documents should be evaluated against the General Plan's policies CEJ.2, CE-J.3, LU-A.7, and ME-B.9. As part of the Blueprint SD Initiative, policy LU-A.7 was renumbered to LU-A.8 and policy ME-B.9 was renumbered to ME-D.176. The Blueprint SD Initiative also updated the language in policies CE-J.3, LU-A.7, and ME-B.9. The revised policies are provided below:

**Policy CE-J.2:** Include community street tree master plans in community plans.

- Prioritize community streets for street tree programs.
- Identify the types of trees proposed for those priority streets by species (with acceptable alternatives) or by design form.
- Integrate known protected trees and inventory other trees that may be eligible to be designated as a protected tree.

**Policy CE-J.3:** Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan.

**Policy LU-A.8:** Determine the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan.

- Consider the role of the village in the City and region; surrounding neighborhood uses; uses that are lacking in the community; uses and policies that can enhance the community; and balanced community goals.
- Achieve transit-supportive density and design. Due to the distinctive nature of each of the community planning areas, population density and building intensity will differ by each community, in alignment with the Village Climate Goal Propensity Map.
- Evaluate the quality of existing and planned transit service.
- Evaluate the quality of existing public facilities and the potential to expand these facilities to support future growth.
- Engage public agencies for facility planning efforts.

**Policy ME-D.176:** Make transit planning an integral component of long-range planning documents and the development review process.

- Continue to coordinate with SANDAG and Metropolitan Transit System to identify corridors and intersections for dedicated transit lanes and transit signal priority treatments and identify recommended transit routes and stops/stations as a part of the preparation of community plans and community plan amendments, and through the development review process.
- Plan for transit-supportive villages, transit corridors, and other higher intensity uses in areas that are served by existing or planned higher-quality transit services, in accordance with the Land Use and Community Planning Element.



- Proactively seek reservations or dedications of right-of-way along transit routes and stations through the planning and development review process.
- Proactively seek opportunities to repurpose rights-of-way and/or installation of interim or pilot improvement projects that support transit operations and can be quickly implemented.
- Locate new public facilities that generate large numbers of person trips, such as libraries, community service centers, and some recreational facilities in areas with existing or planned transit access.
- Design for walkability in accordance with the Urban Design Element, as pedestrian-supportive design also helps create a transit-supportive environment.
- Address rail corridor safety in the design of development adjacent to or near railroad rights-of-way.
- Improve transit resiliency and the ability of transit infrastructure to withstand the effects of climate change, while maintaining services.

### **c. City of San Diego Climate Action Plan**

On August 2, 2022, the City approved an updated CAP, revised GHG CEQA significance thresholds, CAP Consistency Regulations, and an associated Climate Resiliency Fund and Urban Tree Canopy fee. The 2022 CAP update expands the prior CAP approach and identifies six strategies for achieving the goal of net zero emissions:

1. Strategy 1: Decarbonization of the Built Environment
2. Strategy 2: Access to Clean and Renewable Energy
3. Strategy 3: Mobility and Land Use
4. Strategy 4: Circular Economy and Clean Communities
5. Strategy 5: Resilient Infrastructure and Healthy Ecosystems
6. Strategy 6: Emerging Climate Actions

These six strategies aim to set the City on a path towards a goal of net zero emissions by 2035. Strategy 1: Decarbonization of the Built Environment, addresses natural gas consumption in all buildings, both new development, and in the timespan of the CAP, existing buildings. Strategy 2: Access to Clean and Renewable Energy, maintains the 100 percent renewable energy measure and acknowledges San Diego Community Power as a key pathway to achieving the renewable target. Strategy 2 additionally includes targets for converting the City's vehicle fleet to electric and supports increasing electric vehicles used in the community. Strategy 3, Mobility and Land Use, focuses on emissions from transportation and establishes actions that support mode shift through mobility and land use actions and policies. Strategy 4: Circular Economy and Clean Communities, expands on current zero waste goals and maintains gas capture measures, prevents waste from entering the landfill, and supports efforts to increase composting and prevent food waste in response to SB 1383. Strategy 5: Resilient Infrastructure and Healthy Ecosystems, addresses resiliency in the face of the impacts of climate change with a focus on greening the city, starting with Communities of Concern. A Community of Concern means a census tract that has been identified as having very low, low, or moderate access to opportunity as identified in the San Diego Climate Equity Index.

The newest strategy, Strategy 6: Emerging Climate Actions, addresses those GHG emissions that will remain after all current identified measures have been achieved, which account for roughly 20 percent of total GHG emissions by 2035. This new strategy allows the City to address limitations in quantification GHG emissions and science and technology by identifying additional actions, pursuing technological innovation, expanding partnerships, and supporting research that reduces GHG emissions in all sectors.

#### **d. City of San Diego Climate Action Plan Consistency Regulations (San Diego Municipal Code Chapter 14, Article 3, Division 14)**

To facilitate implementation of the CAP, the City adopted the CAP Consistency Regulations (San Diego Municipal Code [SDMC] Chapter 14, Article 3, Division 14). The CAP Consistency Regulations apply to specific ministerial and discretionary projects to ensure compliance with the goals and objectives of the updated CAP. The CAP Consistency Regulations apply to the following projects:

- Development that results in three or more total dwelling units on all premises in the development;
- Non-residential development that adds more than 1,000 square feet and results in 5,000 square feet or more of total gross floor area, excluding unoccupied spaces such as mechanical equipment and storage areas; and
- Parking facilities as a primary use.

The CAP Consistency Regulations require the following:

1. Pedestrian enhancements to reduce heat island effect
  - Where the premises contains a street yard or abuts the public right-of-way, shading of at least 50 percent of the Throughway Zone is required.
  - Where development does not contain a street yard or abut a public right-of-way with a Furnishings Zone, a specified number of trees shall be planted on-site or at an off-site location within one mile of the development. If trees cannot be planted, an Urban Tree Canopy Fee shall be paid.
2. Development on a premises with 250 linear feet or more of street frontage shall provide and privately maintain at least one of the following publicly accessible pedestrian amenities for every 250 linear feet of street frontage to the satisfaction of the Development Services Department:
  - One trash receptacle and one recycling container;
  - Seating comprised of movable seats, fixed individual seats, benches with or without backs, or design feature seating, such as seat walls, ledges, or seating steps;
  - Pedestrian-scale lighting that illuminates the adjacent sidewalk;
  - Public artwork;
  - Community wayfinding signs; or

- Enhancement of a bus stop or public transit waiting station within 1,000 feet of the premises.
3. At least 50 percent of all residential and non-residential bicycle parking spaces required in accordance with Chapter 14, Article 2, Division 5 shall be supplied with individual outlets for electric charging at each bicycle parking space.

If a project is unable to comply with one or more of the CAP Consistency Regulations, the project will be required to obtain a Process Two Neighborhood Development Permit with deviation findings specifying how the project will reduce GHG emissions in a manner comparable to the regulation(s) the project is deviating from.

### 4.7.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to GHG emissions are based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022b). The following issue questions are addressed in this section:

- 1) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
- 2) Would the project conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?

The City's CEQA Significance Determination Thresholds used to evaluate potential impacts are outlined below based on the type of project. The subject project is evaluated against the plan- and policy-level threshold detailed in Section 4.7.3.1 below. While the project-level threshold described in Section 4.7.3.2 below is not applicable to the project, this threshold would be applicable to future development anticipated under the project.

#### 4.7.3.1 Plan- and Policy-Level Threshold

For plan- and policy-level environmental documents, as well as environmental documents for public infrastructure projects, the City Planning Department prepared a memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Documents and Public Infrastructure Projects, dated June 17, 2022, to provide guidance on significance determination as it relates to consistency with the strategies in the CAP. The City's guidance document requires environmental documents to address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP, specifically General Plan Policies LU-A.7, ME-B.9, CEJ.2, and CE-J.3 and Strategy 3 from the CAP, although all six strategies from the CAP should be discussed. Additionally, the analysis should discuss the applicability of the City's CAP Consistency Regulations. As stated above, as part of the Blueprint SD Initiative, policy LU-A.7 was renumbered to LU-A.8 and policy ME-B.9 was renumbered to ME-D.176, and the language in policies CE-J.3, LU-A.7, and ME-B.9 was updated.

### 4.7.3.2 Project-Level Threshold

For project-level environmental documents, significance is determined through a) land use consistency and b) project compliance with the regulations set forth in SDMC Chapter 14, Article 3, Division 14. The first step in determining CAP consistency for development projects is to assess the project's consistency with the growth projections used in the development of the CAP. If a project cannot answer "yes" to one of the three options below, then the project's cumulative GHG impact is significant and the project must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions.

- a. Is the proposed project consistent with the existing General Plan and Community Plan land use and zoning designations?<sup>1</sup>; OR
- b. If the proposed project is not consistent with the existing land use plan and zoning designations, and includes a land use plan and/or zoning designation amendment, would the proposed amendment result in an increased density within a Transit Priority Area (TPA)<sup>2</sup>?; OR
- c. If the proposed project is not consistent with the existing land use plan and zoning designations, does the project include a land use plan and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designations?

The second step in demonstrating CAP consistency is a review to ensure project consistency with the regulations set forth in SDMC Chapter 14, Article 3, Division 14 to ensure that new development is consistent with the CAP's assumptions. Projects that are consistent with the CAP as determined through compliance with the CAP Consistency Regulations may rely on the CAP for the cumulative impacts analysis of GHG emissions. Projects that do not comply with the CAP Consistency Regulations set forth in SDMC Sections 143.1410 and 143.1415 must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in the CAP Consistency Regulations to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP.

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<sup>1</sup>This question may also be answered in the affirmative if the project is consistent with SANDAG Series 14 growth projections, which were used to determine the CAP projections, as determined by the Planning Department.

<sup>2</sup>This category applies to all projects that can answer the following in the affirmative: Is the project premises located wholly within a transit priority area, or on a premises where at least 50 percent of the gross floor area of the new development would be located on the portion of the premises within a transit priority area?

Projects that can answer “yes” to one of the options in step 1 and comply with the regulations in step 2 would have a less than significant impact on GHG emissions, as these projects would be determined to be consistent with the CAP.

Pursuant to CEQA Guidelines Sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project’s incremental contribution to a cumulative GHG effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan. The City’s CAP is a qualified GHG reduction plan based on CEQA Guidelines Section 15183.5(b)(1)(A) through (F).

## 4.7.4 Impact Analysis

### Issue 1 Greenhouse Gas Emissions

*Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

As specified in Section 4.7.3.1, the method for determining significance as it relates to the project’s consistency with the CAP is accomplished through evaluation of the project’s consistency with General Plan policies LU-A.8, ME-D.16, CE-J.2, and CE-J.3 and consistency with the CAP’s strategies, specifically Strategy 3. Consistency with these policies and CAP strategies is detailed under Issues 2c and 2d below. Quantification of GHG emissions is not required for the project based on the City’s CEQA Significance Determination Thresholds (2022b). Pursuant to the City Planning Department’s June 17, 2022 memorandum, Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Infrastructure Projects, ~~(such as Blueprint SD Initiative, University Community Plan Update and Hillcrest Focused Plan Amendment)~~, environmental analysis for plan- and policy-level documents (such as Blueprint SD Initiative, University Community Plan Update and Hillcrest Focused Plan Amendment) should address the ways in which the plan or policy is consistent with the goals and policies of the General Plan and CAP. As detailed in Issue 2, implementation of the project would be consistent with applicable plans, policies and regulations adopted for the purpose of reducing GHG emissions. Therefore, impacts related to GHG emissions would be less than significant.

### Issue 2 Conflicts with Plans or Policies

*Would the project conflict with the City’s Climate Action Plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Future development under the project would be consistent with state plans, SANDAG’s Regional Plan, the City’s General Plan, and the City’s CAP. As detailed below, impacts associated with applicable GHG emission reduction plans would be less than significant.

#### a. CARB’s Scoping Plan

The Scoping Plan, approved by CARB on December 12, 2008, provides a framework for actions to reduce California’s GHG emissions and requires CARB and other state agencies to adopt regulations

and other initiatives to reduce GHGs. As such, the Scoping Plan is not directly applicable to specific projects. In the Final Statement of Reasons for the Amendments to the CEQA Guidelines, the California Natural Resources Agency observed that “[t]he [Scoping Plan] may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan” (California Natural Resources Agency 2009). Under the Scoping Plan, however, there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high GWP GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., LCFS ~~Low Carbon Fuel Standard~~), among others. The project would comply with all applicable regulations adopted in furtherance of the Scoping Plan to the extent required by law. The Scoping Plan recommends strategies for implementation at the statewide level to meet the goals of AB 32 and establishes an overall framework for the measures that will be adopted to reduce California’s GHG emissions (CARB 2008).

AB 1279, the California Climate Crisis Act, codified the carbon neutrality target as 85 percent below 1990 levels by 2045. The 2022 Scoping Plan lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. Appendix D of the 2022 Scoping Plan includes local actions that jurisdictions may take to reduce GHG emissions in line with AB 1279 goals. It includes project attributes for residential and mixed-use projects to qualitatively determine consistency with the 2022 Scoping Plan (CARB 2022b).

Future development implemented under the project would require compliance with the State Building Code’s energy efficiency and applicable green building standards. Additionally, future development would be reviewed at project intake to ensure the inclusion of all applicable energy efficiency and applicable green building requirements of the applicable building and energy codes. Compliance with applicable building code requirements would ensure that future projects implemented under the Blueprint SD Initiative, University CPU, and Hillcrest FPA are consistent with state plans including the 2008, 2017, and 2022 Scoping Plans, and thus, impacts would be less than significant.

## **b. SANDAG’s San Diego Forward: The 2021 Regional Plan**

The Village Climate Goal Propensity map was developed based on modeling that assumes implementation of the Regional Plan transportation network. By planning for growth in areas of existing and future planned transportation infrastructure, the Blueprint SD Initiative would support implementation of the Regional Plan by placing high density residential near existing and planned transit. In addition to the Regional Plan serving as a foundation for the land use framework, the Blueprint SD Initiative, University CPU, and Hillcrest FPA incorporate updates to the respective mobility plans to reflect the transit and mobility improvements envisioned in the Regional Plan.

The project would implement SANDAG’s Regional Plan goals and land use strategies by supporting high density residential and commercial development within Climate Smart Village Areas and incorporating SANDAG mobility improvements into City planning documents. The University CPU

and Hillcrest FPA both include increasing development intensity near existing and planned transit stops per the Regional Plan. By placing housing and jobs near transit, these plans would maximize regional investments in transit in an effort to decrease VMT and associated GHG emissions. Therefore, the Blueprint SD Initiative, University CPU, and Hillcrest FPA would result in future development that would be consistent with the Regional Plan, and impacts would be less than significant.

### **c. City of San Diego General Plan**

The Blueprint SD Initiative replaces the 2008 General Plan Figure LU-1: Village Propensity Map with an updated Village Climate Goal Propensity Map (see Figure 3-1) that identifies areas for prioritization of future homes and jobs. This map forms the basis for defining where future growth is proposed throughout the City in addition to the proposed intensity of development. The updated Village Climate Goal Propensity Map incorporates the 2050 regional transportation network. As part of the Blueprint SD Initiative, the General Plan's policies would be comprehensively amended to reflect new data and information without changing the General Plan framework from the 2008 General Plan.

The City's General Plan City of Villages strategy focuses growth into mixed-use activity centers that are pedestrian-friendly, centers of community, and linked to the regional transit system. Implementation of this strategy is retained and updated through the new Village Climate Goal Propensity map which would guide future development and support reductions in single occupancy vehicle mode share.

As required by the City's CEQA Significance Determination Thresholds (2022b), plan- and policy-level documents should be evaluated against General Plan Policies LU-A.8, ME-D.16, CE-J.2, and CE-J.3. The project's consistency with these policies is outlined below.

#### ***Policy LU-A.8***

Policy LU-A.8 requires determination of the appropriate mix and densities/intensities of village land uses at the community plan level, or at the project level when adequate direction is not provided in the community plan. The Blueprint SD Initiative is consistent with this policy because it anticipates land use changes throughout the City, with a focus on land use change within Climate Smart Village Areas. In addition, the revised Land Use and Community Planning Element includes updated land use designations, revised density ranges, new and updated goals, and new and updated policies consistent with the City of Villages Strategy to meet housing, climate protection, and sustainability goals. The Hillcrest FPA is consistent with this policy because it defines Urban Villages and Neighborhood Villages and clarifies that certain policies (Policies LU-3.2 and LU-3.3) relating to high intensity commercial and mixed-use development apply to Urban Village areas. The University CPU is consistent with this policy because it includes updates to the land use plan for the University CPU area to help achieve the desired vision and objectives for the community. As indicated in Figure 3-5, the highest density urban village designations are centered around the Executive Drive and University Towne Center Blue Line Trolley stops.



**Policy ME-D.176**

Policy ME-D.176 makes transit planning an integral component of long-range planning documents and the development review process. The Blueprint SD Initiative is consistent with this policy because it would focus future land use changes that support higher density and mixed-use development within the Climate Smart Village Areas, which are areas that are located in developed, urban lands with proximity to major transit corridors. The Hillcrest FPA is consistent with this policy because by providing the opportunity for additional homes near the employment center of the Medical Complex neighborhood, in an area with access to high frequency public transit, the Hillcrest FPA will encourage active transportation and reduce automobile trips for work commutes. The University CPU is consistent with this policy because it encourages a variety of uses and building typologies to encourage the economic development of the University CPU area into a robust, transit-oriented neighborhood. Detailed in the Urban Design chapter of the University CPU are the six village areas, with strategies to concentrate density near transit stops while supporting an active public realm.

**Policy CE-J.2**

Policy CE-J.2 includes incorporating community street tree master plans in community plans. The proposed Blueprint SD Initiative does not amend this policy. The Hillcrest FPA is consistent with this policy because the Uptown Community Plan includes a street tree plan and policies for utilizing street trees to enhance design, pedestrian and bicycle facilities, and to calm traffic (Policies UD-3.38, UD-3.41, US-3.42, UD-3.43, UD-3.47, and UD-3.54). In addition, policies are included for street tree recommendations and locations (Policies UD-3.62, UD-3.63, UD-3.64, UD-3.65, UD-3.66). The University CPU is consistent with this policy because it includes an updated street tree plan and corresponding policies (Policy 2.1.d).

**Policy CE-J.3**

Policy CE-J.3 involves developing community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan. The Blueprint SD Initiative does not amend this policy. The Hillcrest FPA and the University CPU are consistent with this policy because the Hillcrest FPA would include revisions to the existing Uptown Community Plan street tree plan and the University CPU includes an updated street tree plan.

Therefore, the project would be consistent with the City's General Plan Policies LU-A.8, ME-D.176, CE-J.2, and CE-J.3. Impacts would be less than significant.

**d. City of San Diego Climate Action Plan**

As detailed below, the CAP establishes six primary strategies for achieving the citywide goals of the plan. An analysis of the project's consistency with the six strategies of the CAP is provided below.

**Strategy 1 Decarbonization of the Built Environment**

Strategy 1 includes goals, actions, and targets with the aim of removing carbon from the City's energy system and transitioning buildings to cleaner, zero emissions sources or technologies. This

strategy includes measures to remove fossil fuels in new building construction and decarbonize existing buildings and City facilities. For existing buildings, the CAP calls for programs that support zero emissions technologies such as energy retrofits, new high efficiency electrical appliance and heating systems paired with building efficiency policies, and financing solutions for residents. Energy reduction can be achieved through the continued use or adaptive reuse of the existing building stock along with any needed energy efficiency upgrades.

An overarching goal of the Blueprint SD initiative is to further implementation of the City's CAP and support a mode shift from single occupancy vehicles to alternative mobility options such as walking/rolling, biking, and transit. Adoption of the Blueprint SD Initiative including the Village Climate Goal Propensity map would lay the framework for growth throughout the City, which would be implemented through future CPUs and/or FPAs.

The Hillcrest CPU would be in compliance with the goals and policies in the Uptown Community Plan that aims to remove carbon from the City's energy system and transition buildings to cleaner, zero emissions sources or technologies. For instance, the Conservation Element includes a goal for implementation of sustainable development and "green" building practices to reduce dependence on non-renewable energy sources, lower energy costs, reduce emissions and water consumption. In addition, Policy CE-1.3 encourages employment of sustainable building techniques for the construction and operation of buildings, which could include solar photovoltaic and energy storage installations, electric vehicle charging stations, plumbing for future solar water heating, or other measures.

The University CPU includes goals and policies in the Conservation and Open Space chapter to reduce energy consumption. Policy 5.15.a would reduce energy consumption by requiring energy efficiency in building design and landscaping and by planning for a self-contained community and energy-efficient transportation. Policy 5.15.b maximizes opportunities for active and passive heating and cooling through site design by means of appropriate building orientation, solar access, and landscaping. Policy 5.15.d requires the incorporation of measures to increase energy-efficient forms of transportation for commercial and industrial developments including supplying bicycle racks and showers, prioritizing parking for carpools, supplying bus stops with support facilities and supplying charging stations for electric vehicles.

Further, new construction and redevelopment that would occur under the project areas would be constructed in accordance with the current CALGreen water conservation requirements, which would reduce energy use. New construction of City infrastructure or other capital improvement projects would also be developed consistent with the City Public Utilities Department's Capital Improvement Program Guidelines and Standards, which provide the framework for the design and construction of new water facilities and address water efficiency, conservation, and recycled and reclaimed water.

### ***Strategy 2 Access to Clean and Renewable Energy***

Strategy 2 provides measures to transition the City's energy system away from fossil fuels and toward clean and renewable sources. Measures included under this strategy aim to increase customer adoption of 100 percent renewable energy supply through the San Diego Community Power program, increase municipal zero emissions vehicles, and support electric vehicle adoption.

As described under Strategy 1 above, an overarching goal of the Blueprint SD Initiative is to further implementation of the City's CAP. Policies CE-1.3, CE-1.5, CE-1.10, and CE-1.11 encourage the pursuit of state and federal funding opportunities for research and development of alternative and renewable energy sources, encourage the use of renewable energy sources, and support the installation of photovoltaic panels, and other forms of renewable energy production.

As described under Strategy 1, above, the Hillcrest FPA would be in compliance with the goals and policies in the Uptown Community Plan. For instance, Policy UD-4.59 encourages the incorporation of elements to use renewable energy such as small low-impact wind turbines or photovoltaic panels on flat roofs that are discretely located to limit any visibility from the street or glare to adjacent properties. In addition, Policy UD-4.61 encourages recycled, rapidly renewable, and locally sourced materials that reduce impacts related to material extraction, processing, and transportation.

The University CPU Active Transportation chapter includes Policy 3.7.a, which encourages implementation or accommodation of infrastructure for electric vehicles including vehicle charging stations as part of residential, commercial, and institutional uses, as well as infrastructure development projects based on future demand and changes in technology.

### ***Strategy 3 Mobility and Land Use***

Strategy 3 has a number of goals that relate to reducing air pollutants emitted from motor vehicles including cars, diesel-powered trucks, buses, and other heavy-duty equipment. This strategy focuses on land use and planning to enhance mobility options with bicycle and pedestrian improvements and calls for increased safe, convenient, and enjoyable transit use. Measure 3.1 in Strategy 3 of the CAP calls for implementation of the General Plan's Mobility Element, the City's Bicycle Master Plan, and Pedestrian Master Plan to provide safe and enjoyable active transportation routes and infrastructure. This measure also calls for streetscape improvements such as trees and additional cooling features to provide shade, upgrades to pedestrian crossings, and improved street signals.

As described under Strategy 1 above, an overarching goal of the Blueprint SD Initiative is to further implementation of the City's CAP. Policy CE-F.1 through Policy CE-F.6 encourages and provides incentives for the use of alternatives to single-occupancy vehicle use, including using public transit, carpooling, vanpooling, teleworking, bicycling, and walking/rolling. The Blueprint SD Initiative identifies the best locations for growth, in partnership with the implementation of the City's mobility goals and strategies, to attain the CAP mode share goals. Blueprint SD identifies the most receptive locations that support biking, walking, and transit usage based on the Regional Travel Demand Model and maximizes achieving CAP goals. The City can achieve the CAP Strategy 3 goals through the Blueprint SD Initiative land use strategy and mobility investments and programs that address travel behavior. The Blueprint SD Initiative land use strategy is the maximum extent feasible land use scenario that – when combined with other mobility implementation strategies, which are part of the overall General Plan Refresh – can achieve the mode shift goals of the CAP.

As described under Strategy 1, above, the Hillcrest FPA would be in compliance with the goals and policies in the Uptown Community Plan. For instance, Policy MO-5.3 encourages the accommodation of emerging technologies such as car charging stations and self-driving/automated vehicles in future infrastructure and development projects, especially in new office and multifamily structures. In addition, Policy MO-1.17 involves coordinating with San Diego Unified District on pedestrian

improvements along Normal Street and potential right of way needed for intersection improvements at El Cajon Boulevard, Normal Street, and Park Boulevard intersection which can include but is not limited to a roundabout traffic control, new crossings, and linear parks.

The University CPU supports a multimodal strategy through improvements to increase bicycle, pedestrian, and transit access (Policies 3.3 a through f, 3.5 a through j, 3.6.e, 3.7.a, 3.8 a through d, and 3.9.b, 5.14.a, and 5.15.d), consistent with Measure 3.2 of the CAP.

The Mobility Chapter of the University CPU contains policies to implement the City's Sustainable Mobility for Adaptable and Reliable Transportation (SMART) initiative by accommodating flexible lanes and SMART corridors that maximize roadway capacity and travel efficiency (Policy 3.5.b). Consistent with Measure 3.6 of Strategy 3 of the CAP, the University CPU would encourage transit-oriented, mixed-use development centered around the Blue Line Trolley stops and other high-frequency transit services. The proposed community-centered "Urban Villages" under the University CPU would implement this measure by supporting mixed-use urban villages near transit stops and major transportation corridors. These developments would improve upon existing services, increase the housing supply, and bring new jobs to the area, while leveraging transit investments.

#### ***Strategy 4 Circular Economy and Clean Communities***

Strategy 4 is citywide and the primary goal is to divert solid waste and capture landfill methane gas emissions. Future development in the project areas would be required to comply with the City's Construction and Demolition Debris Diversion Ordinance (SDMC Chapter 6, Article 6, Division 6), as applicable.

#### ***Strategy 5 Resilient Infrastructure and Healthy Ecosystems***

Strategy 5 calls for further analysis of the resiliency issues related to both the natural and built environments in the City. Measures under Strategy 5 include protection and enhancement of urban canyons to promote carbon sequestration, increased tree canopy in the City, and development of local water supply to reduce dependence on imported water. The citywide strategy is focused on the Pure Water San Diego phased, multi-year program that will use water purification to clean recycled water to ultimately provide one-third of San Diego's water supply locally by 2035.

Future development within the project areas would be required to adhere to the Resilient Infrastructure and Healthy Ecosystems Regulations (SDMC Section 143.1415). The Resilient Infrastructure and Healthy Ecosystems Regulations requires two trees to be provided on the premises for every 5,000 square feet of lot area, with a minimum of one tree per premises. If the required trees cannot be provided on-site, they can either be provided off-site or the Urban Tree Canopy Fee can be paid. In addition, resiliency is addressed throughout the University CPU as it pertains to water usage, energy efficiency, and sustainable development practices as noted above. In addition, Policy 4.1.n included in the Parks and Recreation chapter of the University CPU ensures adequate shading throughout the community.

### ***Strategy 6 Emerging Climate Actions***

Strategy 6 sets forth additional measures to eliminate the citywide emissions required to reach the net zero goal. Strategy 6 focuses on developing more effective partnerships with regional partners such as the Port of San Diego, SANDAG, and the County of San Diego, collaborating on research and projects with the private sector, advancing energy resilience, furthering research on carbon sequestration opportunities, and developing pilot projects that use new techniques and technologies from all sectors.

As described under Strategy 1 above, an overarching goal of the Blueprint SD Initiative is further implementation of the City's CAP. As part of the Blueprint SD Initiative, the Mobility Element would be amended to reflect SANDAG's updated transportation network and includes an updated policy framework to encourage complete streets planning principles and concepts that will result in dynamic, vibrant corridors that support all modes of travel. In addition, as updates to SANDAG's Regional Plan and the regional transportation network occur, the village propensity values identified in the Village Climate Goal Propensity Map could be adjusted depending on an area's village characteristics and proximity to transit and could result in new Climate Smart Village Areas where opportunities for new development would likely be focused.

As described under Strategy 1, above, the Hillcrest FPA would be in compliance with the goals and policies in the Uptown Community Plan that aim to remove carbon from the City's energy system and transition buildings to cleaner, zero-emissions sources or technologies. The Hillcrest FPA also proposes additional policies to coordinate with SANDAG and San Diego Metropolitan Transit System on the feasibility of an aerial skyway connecting Hillcrest and Mission Valley (Policy MO-3.13) and to support a transit connection between the Hillcrest UCSD campus and the La Jolla UCSD campus (Policy MO-3.14).

As described above, the University CPU includes policies and goals to reduce the dependency on non-renewable energy sources and reduce emissions by incorporating transportation demand management strategies. While this strategy is broad by design, the University CPU would be consistent by supporting a resilient carbon-neutral community, a healthy urban forest to promote carbon sequestration, and a clean, green, circular economy.

At a program-level, implementation of the Blueprint SD Initiative, University CPU and Hillcrest FPA would be consistent with the CAP as discussed above; however, the project includes future implementation components, including adoption of future plan amendments, rezones, and future project-specific development consistent with the Village Climate Goal Propensity Map. Future actions to support increases in land use density and/or intensity within areas with a density score of 7 through 14 are anticipated; however, all future land use changes would be reviewed in light of this Program Environmental Impact Report, including a project-specific analysis of consistency with the CAP. Future CPUs would be evaluated in light of the plan and policy-level threshold detailed in Section 4.7.3.1. Application of the City's CAP consistency regulations in addition to compliance with State regulations aimed at reducing GHG emissions are likely to ensure future individual project impacts would be less than significant.

## Cumulative Impacts

The impact analysis discussed under Issue 1 is a cumulative analysis by its nature because GHG emissions are a cumulative issue caused by the global GHG emissions and not an individual project. Cumulatively, there exists a significant impact related to GHG emissions at the global level. However, the project's contribution to the cumulative impact from GHG emissions would be less than cumulatively considerable because all development within the project areas in addition to citywide development would be required to demonstrate consistency with the City's CAP Consistency Regulations, as well as applicable state regulations. Future development throughout the City would be focused in Climate Smart Village Areas, as demonstrated in both University CPU and Hillcrest FPA, where there is the greatest propensity for non-automotive travel, supporting citywide reductions in VMT. Therefore, cumulative impacts related to GHG emissions and conflicts with GHG plans and policies would be less than significant.

### 4.7.5 Significance of Impacts

#### 4.7.5.1 Greenhouse Gas Emissions

Future development under the project would not conflict with implementation of the CAP, as it would be consistent with the CAP's goal of focusing new development in areas that would allow residents, employees, and visitors to safely, conveniently, and enjoyably travel as a pedestrian, or by biking, or transit, such as in Transit Priority Areas, and areas of the City that support existing or planned transit. Therefore, the project is intended to support the City in achieving CAP goals, specifically mode share goals, by supporting and incentivizing future development within high village propensity areas to support development in areas that have a propensity for walking/rolling, bicycling and transit use, supporting citywide VMT efficiency. The project would support the City in obtaining citywide GHG emissions reduction targets under the CAP. Impacts related to GHG emissions would be less than significant.

#### 4.7.5.2 Conflicts with Plans or Policies

Future development under the project would be consistent with state plans, SANDAG's Regional Plan, the City's General Plan, and the City's CAP. Impacts associated with applicable GHG emission reduction plans would be less than significant.

### 4.7.6 Mitigation, Monitoring and Reporting

Impacts related to GHG emissions and consistency with GHG policy would be less than significant; therefore, no mitigation would be required. However, as future development is implemented in accordance with the project, site-specific analysis for project consistency with the City's General Plan and CAP policies would be required in addition to compliance with the CAP Consistency Regulations. Future project-level review would be required to ensure projects would be consistent with applicable plans and policies. Through required evaluation of policy and regulation consistency for future development, impacts related to GHG emissions would be less than significant.

## 4.8 Hazards and Hazardous Materials

This section provides an analysis of the potential significant impacts related to hazards and hazardous materials that could result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (CPU) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC Land Development Code, and associated discretionary actions.

This section presents existing conditions information related to hazardous materials and emergency preparedness, as well as relevant federal, state, and local regulations, policies and programs. The analysis in this section is based on the Hazardous Materials Technical Study prepared by the Bodhi Group, Inc for the University CPU (dated April 2020) which is included as Appendix G to this Program Environmental Impact Report (PEIR) in addition to reviews of regulatory databases. Information pertaining to airport hazards can be found in Section 4.10, Land Use and Planning.

### 4.8.1 Existing Conditions

#### 4.8.1.1 Hazardous Materials

Hazardous materials are substances with certain physical or chemical properties that could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed. Title 22 of the California Code of Regulations (CCR), Division 4.5, Chapter 11, Article 3 groups hazardous materials into four categories based on their properties: toxic (causes human health effects), ignitable (has the ability to burn), corrosive (causes severe burns or damage to materials), and reactive (causes explosions or generates toxic gases). Hazardous materials are commonly used in commercial, agricultural, and industrial applications as well as in residential areas to a limited extent.

##### a. Blueprint SD Initiative

Potential hazardous sites exist throughout the City and are listed in federal, state, and local environmental regulatory agency databases. The status of cases changes over time as new sites are identified and remediation of existing sites is completed. A common source of site contamination are leaking underground storage tanks (LUSTs) associated with former gas stations. Development per the Blueprint SD Initiatives’ policy and land use framework would occur citywide; however, it is anticipated that future land use changes would be focused within the Climate Smart Village Areas,



which are areas with a village propensity value of 7 through 14 where future increases in development intensities that support higher density residential and mixed-use development would be focused. Hazardous sites listed in regulatory databases may exist within the Blueprint SD Initiative Climate Smart Village Areas.

## **b. Hillcrest Focused Plan Amendment**

As part of the Uptown Community Plan Update PEIR adopted in 2016, a search of federal, state, and local environmental regulatory agency databases was conducted in order to identify sites within the Uptown Community Planning area that may have been impacted by hazardous materials or wastes. The search identified 68 documented release cases within Uptown, of which only three cases were open. All of the identified sites were the site of either LUSTs or a cleanup program.

The California Department of Toxic Substances Control's (DTSC's) Brownfields and Environmental Restoration Program (Cleanup Program) EnviroStor database did not identify any active or open sites within the FPA area. The State Water Resources Control Board (SWRCB) GeoTracker database identified the following three active cases:

### ***University of California, San Diego (UCSD) Medical Center (200 West Arbor Drive)***

According to documents available on GeoTracker, a release of approximately 800 to 900 gallons of diesel fuel occurred near two underground storage tanks (USTs) in December of 1991, reportedly the result of overfilling of the tanks during an integrity test. Approximately 630 gallons of fuel were recovered by pumping from the vaults immediately following the release. Between September 17, 1998 and January 28, 1999, seven USTs were removed from the site. During the UST removal, cracks, and perforations were observed along the bottom of four of the USTs. Approximately 1,500 gallons of water and free product were removed from the excavation and transported to the appropriate disposal facility. Site assessment activities began in 1994 and have continued through 2021. The case remains open.

### ***Sixth and Robinson***

According to documents available on GeoTracker, as of February 24, 2023, the case remains open and is under assessment.

### ***The Hub (940-1092 University Avenue)***

According to documents available on GeoTracker, a 7.8-acre site is located in an active shopping center called The Hub (formerly Uptown Shopping Plaza). The site formerly housed dry cleaning facilities that used tetrachloroethene (PCE)-based dry cleaning units. Several environmental investigations have been performed at the site since the 1980s. Most recently, a soil vapor extraction (SVE) pilot test was performed in early 2015. A response plan, which describes a proposal for full-scale SVE operation to remove contaminant mass from soil vapor, was approved by the San Diego Water Board in September 2016 and the SVE remediation system began operation in May 2018. The case remains open.

### **c. University Community Plan Update**

In order to assess the significance of properties in and adjacent to the University CPU area with documented hazardous waste impacts, a search of federal, state, local, and regional environmental regulatory agency databases was conducted for facilities located within the University CPU area and within a 1/8-mile radius of the University CPU area. Forty-eight properties were found to have a potential adverse effect to the University CPU area. The full list can be found in Appendix F. The properties and conditions identified were based on at least one of the following criteria: (1) Properties with documented unauthorized releases of hazardous chemicals or petroleum in or near the University CPU area; (2) Properties with documented residual concentrations of hazardous chemicals in soil in or near the University CPU area; (3) Properties with documented residual concentrations of hazardous chemicals in groundwater in or near the University CPU area; and (4) Properties outside the University CPU area but where hazardous chemicals in the subsurface have the potential to migrate and affect soil, soil vapor, and groundwater in the University CPU area.

Based on an evaluation of the above criteria, each of the 48 properties was assigned a hazard ranking from 1 to 5, with 5 being the highest hazard and 1, the lowest. No properties were assigned a ranking of 5. The following properties, discussed below, were assigned a ranking of 4. A ranking of 4 – High Hazard, is described as posing a potentially significant risk to human health, or environmental, investigation or remediation is needed, as well as restrictions on land use. The following sites are undergoing active remediation with regulatory oversight and/or have remedial actions in place to mitigate existing risks.

#### ***Properties with High Hazard Rankings***

##### ***Chevron and Exxon (3860 and 3918 Governor Drive)***

One former and one active gasoline service station property are part of a comingled plume. According to documents available on Geotracker, chemicals of concern include total petroleum hydrocarbons (TPH) and volatile organic compounds (VOCs), and in 1994, benzene was detected in indoor air inside the station building at 3860 Governor Drive at concentrations exceeding the permissible exposure limit (PEL). As a result, a vapor barrier was installed under the station building. Fuel piping and vent lines were removed, and contaminated soil was encountered. Petroleum hydrocarbons were also detected in groundwater. Free product was detected in multiple wells. The case was closed in 2016 for natural attenuation under property use as a gasoline service station. The closure letter states land use changes will require re-evaluation which may result in reopening the case.

##### ***Distinctive Cleaners (4049 Governor Drive)***

The facility has a closed voluntary assistance program (VAP) case (H10985-001) opened by the facility operator to oversee cleanup of chlorinated hydrocarbons beneath one dry cleaning machine. Chlorinated hydrocarbons have impacted soil and soil gas at the property. According to the closure report on Geotracker, a passive vapor venting system was installed in addition to a vapor barrier to mitigate risks to building occupants. The case was closed for use as a dry cleaner in 2005.

**Science Park Facility (3033 Science Park Road)**

The property was formerly occupied by a defense contractor and is associated with one closed unauthorized release case (H39790-001). Elevated concentrations of chlorinated hydrocarbons were detected in soil vapor to a maximum depth of 25 feet below ground surface (bgs) in 2011. A sub-slab depressurization system was installed in June 2016. The case was closed in 2017 for commercial property use; however, the closure letter states that a sub-slab depressurization system is required to continuously operate at the property for the foreseeable future.

**UCSD Camp Mathews (Gillman Drive, La Jolla)**

The property was formerly occupied by Camp Mathews. Camp Mathews operated from 1917 to 1964 and is now occupied by University of California, San Diego (UCSD) campus. Camp Mathews operated at least 15 different shooting ranges, barracks, administration buildings, maintenance shops, a service station, and an armory. The Remedial Investigation and Feasibility Study on Geotracker reports that between 1998 and 2007, munitions debris and possibly munitions and explosives of concern (MEC) have been found throughout the former military base property (Bristol, 2017). In 2013, based on results of a site investigation in 2007, approximately 16,000 tons of lead-contaminated soil was excavated and disposed of off-site. The case remains open, and the property is undergoing additional investigation.

**4.8.1.2 Emergency Preparedness**

The County of San Diego (County) Office of Emergency Services (OES) coordinates the overall County response to disasters. OES is responsible for notifying appropriate agencies when a disaster occurs, coordinating all responding agencies, ensuring that resources are available and mobilized, developing plans and procedures for response to and recovery from disasters, and developing and providing preparedness materials for the public.

The OES staffs the Operational Area Emergency Operations Center (EOC), a central facility that provides regional coordinated emergency response, and also acts as staff to the Unified Disaster Council (UDC), its governing body. The Unified Disaster Council UDC, established through a joint powers agreement among all 18 incorporated cities and the County of San Diego, provides for the coordination of plans and programs countywide to ensure the protection of life and property.

The City's disaster prevention and response activities are conducted in accordance with the U.S. Department of Homeland Security Office of Domestic Preparedness requirements and incorporate the functions of planning, training, exercising, and execution. The City's disaster preparedness efforts include oversight of the City's EOC, including maintaining the EOC in a continued state of readiness, training City staff and outside agency representatives in their roles and responsibilities, and coordinating EOC operations when activated in response to an emergency or major event/incident.

The City is also a participating agency in the County's Unified San Diego County Emergency Services Organization and County of San Diego Operational Area Emergency Operations Plan (County of San Diego 2018).

## **4.8.2 Regulatory Setting**

### **4.8.2.1 Federal Regulations**

#### **a. U.S. Environmental Protection Agency**

The U.S. Environmental Protection Agency (USEPA) is the primary federal agency regulating hazardous wastes and materials. USEPA broadly defines a hazardous waste as one that is specifically listed in USEPA regulations, has been tested and meets one of the four characteristics established by the USEPA (toxicity, ignitability, corrosiveness, and reactivity), or that has been declared hazardous by the generator based on its knowledge of the waste. USEPA defines hazardous materials as any item or chemical that can cause harm to people, plants, or animals when released by spilling, leaking, pumping, pouring, emptying, discharging, injecting, leaching, dumping, or disposing into the environment. Federal regulations pertaining to hazardous wastes and materials are generally contained in Titles 29, 40, and 49 of the Code of Federal Regulations (CFR). The terms hazardous wastes and hazardous materials are used interchangeably in this section.

#### **b. Resource Conservation and Recovery Act of 1976**

The Resource Conservation and Recovery Act of 1976 (42 United States Code [USC] Sections 6901–6987), including the Hazardous and Solid Waste Amendments of 1984, protects human health and the environment, and imposes regulations on hazardous waste generators, transporters, and operators of treatment, storage, and disposal facilities. The Hazardous and Solid Waste Amendments also require the USEPA to establish a comprehensive regulatory program for ~~underground storage tanks (USTs)~~. The corresponding regulations in 40 CFR Parts 260–299 provide the general framework for managing hazardous waste, including requirements for entities that generate, store, transport, treat, and dispose of hazardous waste.

#### **c. Hazardous Materials Transportation Act**

The Department of Transportation, the Federal Highway Administration, and the Federal Railroad Administration are the three entities that regulate the transport of hazardous materials at the federal level. The Hazardous Materials Transportation Act (49 CFR Part 171, Subchapter C) governs the transportation of hazardous materials. These regulations are promulgated by the Department of Transportation and enforced by the USEPA.

#### **d. Disaster Mitigation Act**

The Disaster Mitigation Act of 2000 requires that a state mitigation plan, as a condition of disaster assistance, add incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two different levels of state plans: “Standard” and “Enhanced”. States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Disaster Mitigation Act also established new requirements for local mitigation plans.

## 4.8.2.2 State Regulations

### a. Environmental Health Standards for the Management of Hazardous Waste

CCR Title 22, Division 4.5 provides standards applicable to generators and transporters of hazardous wastes, as well as standards for operators of hazardous waste transfer facilities, among other regulations.

### b. Hazardous Materials Release Response Plans and Inventory

Two programs in the California Health and Safety Code (H&SC) Chapter 6.95 are directly applicable to the California Environmental Quality Act (CEQA) issue of risk due to hazardous substance release. In San Diego County, these two programs are referred to as the Hazardous Materials Business Plan (HMBP) program and the California Accidental Release Prevention (CalARP) program. The County of San Diego Department of Environmental Health and Quality (DEHQ) is responsible for the implementation of the HMBP program and the CalARP program in San Diego County. The HMBP and CalARP programs provide threshold quantities for regulated hazardous substances. When the indicated quantities are exceeded, an HMBP or Risk Management Plan is required pursuant to the regulations.

Congress requires USEPA Region 9 to make Risk Management Plan information available to the public through USEPA's Envirofacts Data Warehouse. The Envirofacts Data Warehouse is considered the single point of access to select USEPA environmental data.

California H&SC Section 25270, Aboveground Petroleum Storage Act, requires registration and spill prevention programs for aboveground storage tanks (ASTs) that store petroleum. In some cases, ASTs for petroleum may be subject to groundwater monitoring programs implemented by the Regional Water Quality Control Boards (RWQCBs) and the SWRCB.

### c. Senate Bill 1889, Accidental Release Prevention Law/Chemical Accident Release Prevention Program

Senate Bill (SB)-1889 required California to implement a federally mandated program governing the accidental airborne release of chemicals listed under Section 112 of the Clean Air Act. Effective January 1, 1997, CalARP replaced the previous California Risk Management and Prevention Program and incorporated the mandatory federal requirements. CalARP addresses facilities containing specified hazardous materials that, if involved in an accidental release, could result in adverse off-site consequences. CalARP defines regulated substances as chemicals that pose a threat to public health and safety or the environment because they are highly toxic, flammable, or explosive.

### d. Emergency Response to Hazardous Materials Incidents

California has developed an emergency response plan to coordinate emergency services provided by federal, state, and local governments and private agencies. Response to hazardous material

incidents is one part of this plan. The plan is managed by the California Emergency Management Agency, which coordinates the responses of other agencies, including the California Environmental Protection Agency (California EPA), California Highway Patrol, California Department of Fish and Wildlife (CDFW), and RWQCB.

### **e. Cortese List**

The Cortese List refers to provisions in Government Code Section 65962.5, which requires that the DTSC, State Department of Health Services, SWRCB, and designated local enforcement agencies compile and update lists of hazardous materials sites under their purview as specified in the code. The “Cortese List” consists of the information provided by these agencies under the code.

DTSC's Brownfields and Environmental Restoration Program (Cleanup Program) EnviroStor database provides DTSC's component of the Cortese List data by identifying State Response, Federal Superfund, and Backlog sites listed under H&SC Section 25356, as well as Certified with Operation and Maintenance sites. The EnviroStor database identifies sites that have known contamination or potentially contaminated sites requiring further investigation, and facilities permitted to treat, store, or dispose of hazardous waste. The EnviroStor database includes lists of the following site types: federal Superfund; State Response, including military facilities and State Superfund; voluntary cleanup; and school sites.

The SWRCB GeoTracker database tracks sites that impact groundwater or have the potential to impact groundwater. It includes sites that require groundwater cleanup such as LUSTs, Department of Defense and Site Cleanup Program sites, as well as permitted facilities that could impact groundwater such as operating USTs, irrigated lands, oil and gas production sites, and land disposal sites.

### **f. California Department of Toxic Substances Control**

Within the California EPA, DTSC has primary regulatory responsibility, with delegation of enforcement to local jurisdictions that enter into agreements with the state agency, for the management of hazardous materials and the generation, transport, and disposal of hazardous waste under the authority of the Hazardous Waste Control Law. Since August 1, 1992, DTSC has been authorized to implement the state’s hazardous waste management program for the California EPA.

### **g. State Water Resources Control Board**

The San Diego RWQCB is authorized by the SWRCB to enforce provisions of the Porter–Cologne Water Quality Control Act of 1969. This act gives the San Diego RWQCB authority to require groundwater investigations when the quality of groundwater or surface waters of the state is threatened and to require remediation of the site, if necessary.

## **h. The California Department of Transportation**

The California Department of Transportation Caltrans manages more than 50,000 miles of California's highway and freeway lanes, provides inter-city rail services, permits more than 400 public-use airports and special-use hospital heliports, and works with local agencies. The California Department of Transportation Caltrans is also the first responder for hazardous material spills and releases that occur on highway and freeway lanes and inter-city rail services.

## **i. State Hazard Mitigation Plan**

The State Hazard Mitigation Plan (SHMP) is the state's hazard mitigation guidance document and provides a comprehensive description of California's historical and current hazard analysis, mitigation strategies, goals, and objectives. The SHMP reflects the state's commitment to reduce or eliminate potential risks and impacts of natural and human-caused disasters by making California's families, homes, and communities better prepared and more disaster-resilient. The SHMP is also a federal requirement under the Disaster Mitigation Act of 2000 for the State of California to receive federal funds for disaster assistance grant programs (OES 2023<sup>18</sup>).

## **j. California Underground Storage Tank Regulations**

The California Underground Storage Tank Regulations (CCR Title 23, Chapter 16) include guidelines and standards to protect waters from hazardous substance discharges from USTs. The regulations establish construction requirements for new USTs; establish separate monitoring requirements for new and existing USTs; establish uniform requirements for unauthorized release reporting and for the repair, upgrade, and closure of USTs; specify variance request procedures; and require responsible parties to remediate any unauthorized releases from USTs.

### **4.8.2.3 Local Regulations**

#### **a. City of San Diego Municipal Code**

##### ***Hazardous Materials***

The Hazardous Waste Establishment regulations of the San Diego Municipal Code (SDMC) (SDMC Chapter 4, Article 2, Division 8) enables the Health Officer to establish a program to monitor establishments where hazardous wastes are produced, stored, handled, disposed of, treated, or recycled, and to provide health care information and other appropriate technical assistance on a 24-hour basis to emergency responders in the event of a hazardous waste incident involving community exposure. The Disclosure of Hazardous Materials regulations (SDMC Chapter 4, Article 2, Division 9) establishes a system for the provision of information on potential hazards or hazardous materials in the community, including appropriate education and training. Elements of the system include the Health Officer's ability to seek advice from the Hazardous Materials Advisory Committee, the filing of a hazardous substance disclosure form, the content of the disclosure form, emergency response information, and penalty for violations.



## ***Explosives***

SDMC Chapter 5, Article 3 addresses firearms, dangerous weapons, explosives, and hazardous trades. Included are regulations concerning blasting, firearms, and other hazardous items (pointed missiles, steam boilers, etc.). Specific definitions of various hazardous items and penalties for misuse are listed in the regulations.

### **b. City of San Diego Building Regulations**

The City's Building Regulations (SDMC Chapter 14, Article 5) are intended to regulate the construction of applicable facilities and encompass (and formally adopts) associated elements of the California Building Code (CBC). Specifically, this includes guidelines regulating the "construction, alteration, replacement, repair, maintenance, moving, removal, demolition, occupancy, and use of any privately owned building or structure or any appurtenances connected or attached to such buildings or structures within this jurisdiction, except work located primarily in a public right-of-way, public utility towers and poles, mechanical equipment not specifically regulated in the Building Code, and hydraulic flood control structures" (SDMC Section 145.0102). The City's Building Regulations also establish acceptable construction materials for development near open space to minimize fire risk through adoption of Chapter 7, "Fire Resistance-Rated Construction," and Chapter 7A, "Materials and Construction Methods for Exterior Wildfire Exposure," of the California Building Code (SDMC Chapter 14, Article 5, Division 7).

### **c. Off-Site Development Impacts**

The City's Off-Site Development Impact Regulations (SDMC Chapter 14, Article 2, Division 7) are intended to provide standards for air contaminants, noise, electrical/radioactivity disturbance, glare, and lighting. The division applies to all development that produces air contaminants, noise, electrical/radioactivity disturbance, glare, or lighting in any zone. SDMC Section 142.0710 states that air contaminants including smoke, charred paper, dust, soot, grime, carbon, noxious acids, toxic fumes, gases, odors, and particulate matter, or any emissions that endanger human health, cause damage to vegetation or property, or cause soiling shall not be permitted to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located.

### **d. County of San Diego Department of Environmental Health and Quality**

The Hazardous Materials Division (HMD) of the County's DEHQ regulates hazardous waste and tiered permitting, USTs, aboveground petroleum storage and risk management plans, ~~HMBPs hazardous materials business plans~~ and chemical inventory, and medical waste. The HMD's goal is "to protect human health and the environment by ensuring that hazardous materials, hazardous waste, medical waste, and underground storage tanks are properly managed" (County of San Diego 2016).

### **e. California EPA's Unified Program**

In 1993, ~~Senate Bill~~ SB 1082 gave the California EPA the authority and responsibility to establish a unified hazardous waste and hazardous materials management and regulatory program, commonly referred to as the Unified Program. The purpose of this program is to consolidate and coordinate six different hazardous materials and hazardous waste programs, and to ensure that they are consistently implemented throughout the state. The California EPA oversees the Unified Program with support from DTSC, the RWQCBs, OES, and the state Fire Marshal.

State law requires the County and local agencies to implement the Unified Program. The agency in charge of implementing the program is called the Certified Unified Program Agency (CUPA). The HMD of the County's DEHQ is the CUPA for San Diego County.

### **f. San Diego County Multi-Jurisdictional Hazard Mitigation Plan**

The 2023 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) was prepared to comply with the Disaster Mitigation Act of 2000 to increase disaster planning funding. The purpose of the County's MJHMP (County of San Diego 2023) is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-made hazards. An important component of the MJHMP is the Community Emergency Response Team ~~(CERT)~~, which educates community members about disaster preparedness and trains them in basic response skills, including fire safety. The MJHMP is intended to educate the public, help serve as a decision-making tool, supplement and enhance local policies regarding disaster planning, and improve multi-jurisdictional coordination. The MJHMP identifies hazardous materials and wildfire/structure fire among the top hazards in the City due to the potential loss of life, injuries, and damage to property, as well as the significance in the disruption of services (City of San Diego 2023).

### **g. San Diego County Emergency Operations Plan**

The 2018 San Diego County Emergency Operations Plan describes a comprehensive emergency management system that provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and providing for the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector.

### **h. City's Emergency Operations Procedures**

The City's Emergency Operations Procedures ~~(EOP)~~ is an administrative regulation adopted to facilitate effective operations during emergency incidents and disasters and is in accordance with the State of California's Standardized Emergency Management System ~~(SEMS)~~ and the National

Incident Management System (NIMS). The Emergency Operations Procedures EOP sets up the protocol for the control and coordination of on-scene emergency operations including designating an Incident Commander, establishing Incident Command Posts, conducting response operations according to departmental protocols and Standardized Emergency Management System/National Incident Management System SEMS/NIMS principles, requesting assistance from other City departments for support as needed, and informing senior City officials as appropriate.

### i. Vision Zero

Vision Zero is a strategy to eliminate all traffic fatalities and severe injuries associated with transportation. The Vision Zero Strategic Plan was originally adopted in 2015 and an update to the Strategic Plan was adopted in December 2020 to identify a plan to achieve a safer San Diego. The Vision Zero Strategic Plan includes five strategic actions:

- Use a data-driven approach to deploy effective countermeasures;
- Plan for long term transformation based on Safe System principles;
- Budget and build improvements, with increased focus on Communities of Concern;
- Engagement and enforcement; and
- Education, community and a culture of safety.

### j. City of San Diego General Plan

~~Multiple elements of City's General Plan address hazards and hazardous materials. The General Plan provides policies for protecting communities from unreasonable risk of hazards. Specifically, the Public Facilities, Services and Safety Element includes policies related to hazardous materials, disaster preparedness, and maintenance of emergency and evacuation plans. Refer to Section 4.18.2.3f of this PEIR for relevant policies related to evacuation and wildfire hazards. Applicable General Plan policies, including new and/or updated policy language applicable to hazards and hazardous materials are discussed below.~~

The **Land Use and Community Planning Element** also includes the following policy regarding toxic air emissions and associated health risks:

**Policy LU-I.14:** ~~As part of community plan updates or amendments that involve land use or intensity changes, evaluate public health risks associated with identified sources of hazardous substances and toxic air emissions (see also Conservation Element, Section F). Create adequate distance separation, based on documents such as those recommended by the California Air Resources Board and site-specific analysis, between sensitive receptor land use designations and potential identified sources of hazardous substances such as freeways, industrial operations or areas such as warehouses, train depots, port facilities, etc. (refer to Section 4.2.4, Issue 3 of this PEIR for a discussion of this issue).~~

The **Public Facilities, Services and Safety Element** includes policies related to hazardous materials, disaster preparedness, and maintenance of emergency and evacuation plans. Refer to Section 4.18.2.3f of this PEIR for relevant policies related to evacuation and wildfire hazards.

### 4.8.3 Significance Determination Thresholds.

Thresholds used to evaluate potential impacts related to hazards and hazardous materials are based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?
- 2) Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
- 3) Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter-mile of an existing or proposed school?
- 4) Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or environment?
- 5) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

### 4.8.4 Impact Analysis

#### Issue 1 Hazardous Materials

*Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Future development that could occur in accordance with the Blueprint SD Initiative, Hillcrest FPA, and University CPU may involve the routine use, transport or disposal of common hazardous materials. Additionally, future grading and project construction may require the use of hazardous materials (e.g., fuels, lubricants, solvents, etc.), which would require proper storage, handling, use, and disposal. At the time future projects are proposed, the use of hazardous materials and the potential for hazards to occur associated with routine transport, use or disposal would be evaluated, and future projects would be required to comply with federal, state, and local regulations which require adherence to specific guidelines regarding the use, transportation, disposal, and accidental release of hazardous materials.

Although small amounts of common hazardous materials may be used for cleaning and maintenance, compliance with applicable federal, state, and local regulations would ensure that regulated hazardous materials are handled and disposed of properly, and that no hazards would result during long-term operations. Hazardous materials and waste would be managed and used in accordance with all applicable federal, state, and local regulations. Therefore, the project would not

create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

### Issue 3 Hazards Near a School

*Would the project result in hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ~~one~~ quarter-mile of an existing or proposed school?*

Future development that is anticipated to occur in accordance with the Blueprint SD Initiative would be located throughout the City and may be located within proximity to schools. Additionally, there are 13 public and private schools within the Hillcrest FPA area (see Table 4.12-8 of this PEIR); 10 public, charter, and private schools, as well as UCSD, within the University CPU area (see Table 4.12-9 of this PEIR); and there are numerous existing schools/day care/educational facilities within and adjacent to both the Hillcrest FPA and the University CPU areas. Future development that occurs consistent with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU could also result in the development of additional schools within the project areas.

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative Climate Smart Village Areas. ~~Although the~~ The Blueprint SD Initiative's' policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. The Hillcrest FPA and University CPU also includes updated land use and policy frameworks that will increase residential and mixed-use development in the Hillcrest FPA and University CPU areas.

Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are planning level actions that anticipate future development; however, no specific development is proposed at this time. While it is possible that future development and redevelopment activities under the project could emit hazardous emissions and/or use or transport hazardous materials within 0.25 miles of an existing or future school, the project would not increase the likelihood that these activities will occur compared to baseline conditions. All future development and redevelopment activities that may result from the project would be required to conform to all applicable regulations and industry and code standards related to hazardous emissions and the handling of hazardous materials. Specifically, this would involve compliance with pertinent federal, state, and local regulations and standards related to transporting and handling hazardous materials including discretionary approval from the County of San Diego Department of Environmental Health, ~~Hazardous Materials Division (DEHQ/HMD)~~ for all covered projects that are undertaken consistent with the project. In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the cleanup and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at such locations until a "no further action" clearance letter is issued by the County

DEHQ/HMD as the local CUPA, or a similar determination is issued by the City's Fire-Rescue Department (SDFD), DTSC, RWQCB, or other responsible agency. Documentation of such clearance would be provided on a project-by-project basis as part of the project-specific CEQA and/or building permit reviews and would be a requirement for all future project approvals.

For any new schools that could be constructed within 0.25 miles of a facility that emits hazardous emissions or handles hazardous or acutely hazardous materials, substances, or waste, the school district or private school entities would be responsible for planning, siting, building, and operating the schools. It would be the responsibility of the school district to perform an in-depth analysis of any potential hazards at the project level. Additionally, pursuant to Public Resources Code Section 21151.4, an Environmental Impact Report (EIR) shall not be certified, nor shall a Negative Declaration (ND) be approved for any project involving the construction or alteration of a facility that would emit hazardous emissions or handle extremely hazardous substances within a quarter mile of a school unless the lead agency preparing the EIR or ND has consulted with the school district having jurisdiction over the school, and the school district has been given written notification of the project at least 30 days prior to the proposed certification of the EIR or approval of the ND. Through implementation of the existing regulations, impacts to schools from hazardous emissions, materials, substances, or waste would be less than significant.

## Issues 2 and 4 Hazardous Material Sites

*Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?*

*Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or environment?*

As stated in Section 4.8.1 above, potential known and unknown hazardous sites exist throughout the City including within the Blueprint SD Initiative's Climate Smart Village Areas. A search of federal, state, and local environmental regulatory agency databases found 68 documented release cases of which three cases were open within the Uptown Community Planning Area. Within the Hillcrest FPA area specifically, 54 documented release cases were identified, of which, three cases were open. There are no known hazardous materials conditions that would preclude the proposed development anticipated in the FPA area. However, some properties may need to be individually evaluated at the time of redevelopment and may need remedial measures to mitigate potential exposure to hazardous materials present at those properties.

Over 9,800 properties were evaluated for potential hazards in the University CPU area as detailed in Appendix F. Based on the evaluations of the initial properties, it was determined that 48 properties could have a potential adverse effect to the University CPU area from releases of hazardous chemicals. The 48 properties were ranked based on the types of chemicals anticipated to be present, the medium affected, and potentially complete exposure pathways to receptors. Although over 9,800 database records were screened and 48 properties were evaluated, the possibility of undocumented releases within the University CPU area exists. There are no known hazardous

materials conditions that would preclude the proposed development anticipated in the CPU area. However, some properties may need to be individually evaluated at the time of redevelopment and may need remedial measures to mitigate potential exposure to hazardous materials present at those properties.

Future development in accordance with the project could convert existing industrial/commercial sites with a history of hazardous materials use to new uses, such as parks, plazas, or open space, and mixed-use areas that would likely accommodate a higher density of people and sensitive receptors. Redevelopment of listed hazardous materials sites could release hazardous materials into the environment and result in both short- and long-term exposure to workers, residents, and visitors. Based on the locations of these listed sites, future development in accordance with the project could potentially expose people or sensitive receptors to hazardous materials.

All future development and redevelopment activities under the project would be required to adhere to all applicable regulations and industry and code standards related to health hazards from hazardous materials. Specifically, this would involve compliance with pertinent federal, state, and local regulations and standards related to hazardous materials, including discretionary approval from the County DEHQ/HMD for all covered projects. In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the cleanup and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at such locations until a “no further action” clearance letter is issued by the County DEHQ/HMD as the local CUPA, or a similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency. Documentation of such clearance would be provided as part of the project-specific CEQA and/or building permit reviews for individual projects and would be a requirement for all future project approvals. Therefore, although the project areas include known and unknown hazardous sites, compliance with existing regulations would reduce potential impacts to a less than significant level.

## Issue 5 Emergency Response

*Would the project impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The City is a participating entity in the MJHMP (County of San Diego 2017), which is generally intended to provide compliance with regulatory requirements associated with emergency response efforts. The Emergency Operations Plan (EOP) (County of San Diego 2018) identifies a broad range of potential hazards and a response plan for public protection. The plan identifies major interstates and highways within San Diego County that could be used as primary routes for evacuation in the event of an emergency. As part of the emergency response efforts, the City's ~~OES~~ Office of Emergency Services oversees emergency preparedness and response services for disaster-related measures, including administration of the City's EOC and alternate EOC.

Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are planning level actions that anticipate future development; however, no specific development is proposed at this time. At a program level of review, implementation of the Blueprint SD Initiative, ~~the Hillcrest FPA, and the University CPU~~ would guide future development in appropriate locations, including



supporting higher densities and intensities consistent with the Village Climate Goal Propensity map with a focus on development in the Climate Smart Village Areas. ~~The Blueprint SD Initiative includes Existing City policies are in place~~ supporting a roadway network that ~~would support~~ accommodates emergency response. For example, the City's General Plan Mobility Element policy ME-E.9 supports improving operations and maintenance on City streets and sidewalks ensuring that when new or existing streets are built or modified, they are designed, constructed, operated, and maintained to accommodate and balance service to all users/modes (including walking/rolling, bicycling, use of shared mobility devices, transit, high occupancy vehicles, autos, trucks, automated waste and recycling collection vehicles, and emergency vehicles); ~~and the Public Facilities, Services and Safety Element policy PF-D.15~~ supports maintaining access for fire apparatus vehicles along public streets in very high fire hazard severity zones for emergency equipment and evacuation.

The Public Facilities, Services and Safety Element also includes policies which support emergency response and emergency evacuation planning efforts. Relevant policies include, but are not limited to, PF-D.19 which supports City-wide emergency and disaster preparedness education programs; PF-P.3 and PF-P.3a which supports developing and maintaining current, integrated, and comprehensive Emergency Operations and Disaster Plans on an annual basis and preparing and maintaining a comprehensive multi-modal evacuation plan; and PF-P.13 which encourages continued participation in and implementation of the MJHMP to further coordinate hazard mitigation planning on a regional level. Thus, implementation of the Blueprint SD Initiative would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan.

Implementation of the Hillcrest FPA would increase the allowable development intensity and residential and mixed-use density within approximately 380 acres of the Hillcrest and Medical Complex neighborhoods allowing for an additional approximately 17,218 residential units and approximately 1,037,600 square feet of non-residential floor area in close proximity to transit to maximize use of sustainable transportation options. ~~At buildout, the University CPU would result in an overall community-wide increase of approximately 36,803,000 square feet of planned non-residential floor area and approximately 29,000 additional planned residential units.~~

~~The project does not include any goals or objectives that would interfere or diminish the capacity of existing programs and facilities to provide effective emergency response or allow for sufficient emergency evacuation in the project areas.~~ The Hillcrest FPA includes policies supporting emergency response and operational improvements to facilitate ingress and egress of emergency vehicles and safety improvements along corridors and at intersections, consistent with the City's Vision Zero Strategic Plan. The Uptown Community Plan includes the following key policies applicable to the Hillcrest FPA, ~~supporting safety and access improvements:~~

- MO-4.1: Provide a complete streets network throughout Uptown, safely accommodating all modes of travel and users of the public right-of-way
- MO-4.3: Implement focused intersection improvements to improve safety and operations for all modes of travel.
- MO-4.8: Implement traffic operational improvements that support and facilitate ingress and egress movements of emergency vehicles accessing the Medical Hospital Complex neighborhood.

- MO-4.11: Implement focused intersection improvements to provide safety for all modes of transportation at major commercial intersections, at popular destinations in the community, and to and from Balboa Park.
- PF-1.7: Support regular upgrading of Uptown fire stations as necessary to adequately respond to fires and emergencies.

In addition, the Hillcrest FPA has identified dedicated roadway space for transit along several key corridors in the Hillcrest community, which will also be available for emergency vehicles (see Figure 3-12). These improvements will allow emergency responders to efficiently respond to emergency situations. Thus, implementation of the Hillcrest FPA would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan.

At buildout, the University CPU would result in an overall community-wide increase of approximately 40,582,000 ~~36,803,000~~ square feet of planned non-residential floor area over existing conditions and approximately 30,480 ~~29,000~~ additional planned residential units over existing conditions. The University CPU includes the following policies which support emergency response and evacuation planning efforts:

- 7.2B: Support the upgrades, modernization of facilities and equipment, and/or expansion of the stations serving the University Community, as necessary, to adequately respond to fires and emergencies.
- 7.10C: Promote wildland fire preparedness including emergency evacuation plans and mapping of routes for residential households.

Implementation of the University CPU would also improve circulation and mobility for all modes of travel, including emergency vehicles throughout the CPU area. The University CPU has identified dedicated roadway space for transit along several key corridors through the implementation of Sustainable Mobility for Adaptive and Reliable Transportation (SMART) Corridors and Flexible (Flex) Lanes in the University CPU area (see Figure 3-22). SMART Corridors are major arterial roadways that provide access to or between at least two freeways and where mobility improvements are made for transit and other congestion-reducing mobility forms through the re-purposing of roadway space. Flex Lanes are re-purposed lanes for transit and/or other congestion-reducing mobility forms; and provide dedicated space for moving people more efficiently through a corridor. These proposed improvements would encourage more people to choose transit as their preferred mode of transportation, which would reduce traffic congestion, and improve circulation efficiency. Further, these flexible or transit-only lanes can be utilized as-needed for emergency access, thereby improving emergency access in the area. The University CPU also includes policies which that call for the implementation of Intelligent Transportation Systems (ITS) infrastructure. For example, Policy 3.7B supports utilizing ITS improvements to enhance vehicular operations on roadways and provide real-time travel information for all users; and Policy 3.7C supports the implementation of ITS and emerging technologies to help improve public safety, reduce collisions, minimize traffic congestion, maximize parking efficiency, and manage transportation and parking demand to improve environmental awareness and neighborhood quality. As these systems come online, they would further improve the efficiency of the transportation network. ~~also identifies dedicated roadway space for transit along several key corridors in the University community, which will also be available for emergency vehicles.~~

As discussed in Section 4.18.4 Issue 2 of this PEIR, existing emergency evacuation routes in the University CPU area include Interstates (I-) 5 and 805 and State Route (SR-) 52. These major evacuation routes are accessible from Regents Road, Genessee Avenue, Governor Drive, Nobel Drive, Gillman Drive/La Jolla Colony Drive, and Sorrento Valley Road. Implementation of the University CPU is not anticipated to impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan because the existing transportation network serving the community would remain accessible for emergency response and evacuations.

Refer to Section 4.18.4, Issue 2 of this PEIR for additional discussion of emergency response and evacuation as it pertains to the project areas. As discussed in that section, build-out of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would result in higher intensity development within the City which would be focused within urban settings, in areas with an established transportation network. The project does not include any goals or objectives that would interfere or diminish the capacity of existing programs and facilities to provide effective emergency response or allow for sufficient emergency evacuation in the project areas. As a result, implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would not impair implementation of, or physically interfere with an adopted emergency response plan or emergency evacuation plan and impacts related to this issue would be less than significant.

## **Cumulative Impact Analysis**

As discussed throughout this section, compliance with federal, state, regional, and local health and safety laws and regulations would address potential impacts related to hazards sites, hazardous materials, and hazards near a school. In addition, potential hazards associated with hazardous sites, hazardous material, and hazards near a school are site-specific and would not combine with hazards in other communities within the vicinity of the project area to create a cumulative impact. Therefore, implementation of the project would not result in a cumulatively significant impact related to hazards sites, hazardous materials, or hazards near a school. As discussed in Issue 5, the project does not include any goals or objectives that would interfere or diminish the capacity of existing programs and facilities to provide effective emergency response or allow for sufficient emergency evacuation in the project areas and would improve circulation and mobility in the project area for all modes of travel, including emergency vehicles. Implementation of the Blueprint SD Initiative, Hillcrest FPA, and the University CPU would not cause a cumulative significant impact related to impairing implementation of, or physically interfering with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

## **4.8.5 Significance of Impacts**

### **4.8.5.1 Hazardous Materials**

Although future development and construction activities associated with development contemplated by the project could involve the transport, use, or disposal of hazardous materials, compliance with applicable federal, state, and local regulations would ensure that regulated hazardous materials are handled and disposed of properly. Operation of future development could

use small amounts of hazardous materials for cleaning and maintenance; however, hazardous materials and waste would be managed and used in accordance with all applicable federal, state, and local laws and regulations, which would ensure that no hazards would result during long-term operation of the project. The project would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

#### **4.8.5.2 Hazards Near a School**

The project will not, on its own accord, increase the likelihood that hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste will occur near schools compared to baseline conditions. Future development implemented in accordance with the project would be subject to applicable regulations and industry and code standards and requirements related to hazardous emissions and the handling of hazardous materials, including as they relate to proximity to schools. For any new schools that could be constructed within 0.25 mile of a facility that emits hazardous emissions or handles hazardous or acutely hazardous materials, substances, or waste, the school district or private school entities would be responsible for planning, siting, building, and operating the schools. It would be the responsibility of the school district to perform an in-depth analysis of any potential hazards at the project level. Additionally, pursuant to Public Resources Code Section 21151.4, an EIR shall not be certified nor shall an ND be approved for any project involving the construction or alteration of a facility that emits hazardous emissions or handles extremely hazardous substances within a quarter mile of a school unless the lead agency preparing the EIR or ND has consulted with the school district having jurisdiction over the school, and the school district has been given written notification of the project at least 30 days prior to the proposed certification of the EIR or approval of the ND. Therefore, impacts to schools from hazardous materials or handling hazardous or acutely hazardous materials, substances, or waste would be less than significant.

#### **4.8.5.3 Hazardous Materials Sites**

In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at a contaminated site until a “no further action” clearance letter from the County’s DEHQ, or a similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency. Therefore, impacts related to hazardous materials sites would be less than significant.

#### **4.8.5.4 Emergency Response**

The project does not include any goals or objectives that would interfere or diminish the capacity of existing programs and facilities to provide effective emergency response or allow for sufficient emergency evacuation in the project areas. The project includes Existing City policies which are in place supporting effective emergency evacuation and would also improve circulation and mobility in the project area for all modes of travel, including emergency vehicles, and dedicated roadway space for transit would also be available for emergency vehicle use. Additionally, future development under the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be primarily

located within areas proximate to major transportation corridors that serve as emergency evacuation routes. Impacts related to emergency response associated with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be less than significant.

### **4.8.6 Mitigation, Monitoring and Reporting**

Impacts would be less than significant; no mitigation is required.

## 4.9 Hydrology

This section analyzes the potential for significant impacts related to hydrology that could result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (LCPU) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC Land Development Code, and associated discretionary actions.

### 4.9.1 Existing Conditions

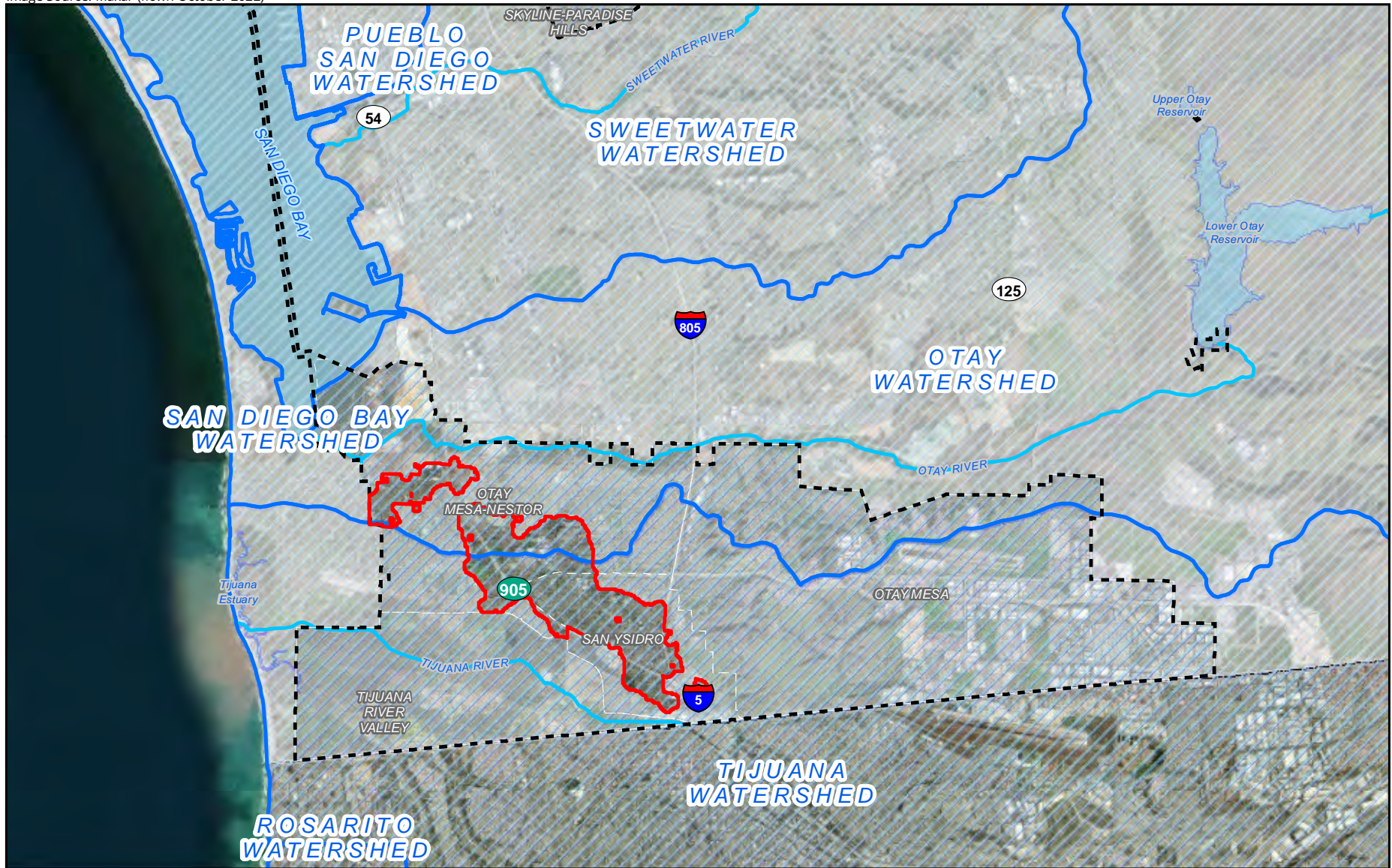
#### 4.9.1.1 Hydrologic Setting






In San Diego County, there are eleven major watersheds west of the Peninsular Range Mountains. These watersheds all ultimately drain to the Pacific coast. Of the eleven major watersheds, seven are within the jurisdiction of the City. The Climate Smart Village Areas, which are areas where future increases in development density and intensities would be focused per the Blueprint SD Initiative, are located within the San Dieguito Watershed, the San Diego River Watershed, the Los Peñasquitos Watershed, the Pueblo San Diego Watershed, the Sweetwater Watershed, the Otay Watershed, and the Tijuana Watershed (River Focus Water Resources 2020), as shown in Figures 4.9-1a through 4.9-1e.

The Hillcrest FPA area is located in two watersheds, as shown in Figure 4.9-1b. The northern portion of the FPA area is located in the San Diego Watershed and the southern portion of the FPA area is located in the Pueblo San Diego Watershed.

The University CPU area is located in the Los Peñasquitos watershed. A map of the Los Peñasquitos Hydrologic Unit (HU) is shown in Figures 4.9-1b and 4.9-1c. Within the University CPU area, drainage flows from east to west within Rose Canyon, before turning south towards Mission Bay as it approaches Interstate (I) 5.





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Watersheds
-  Waterbodies
-  Rivers

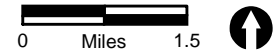
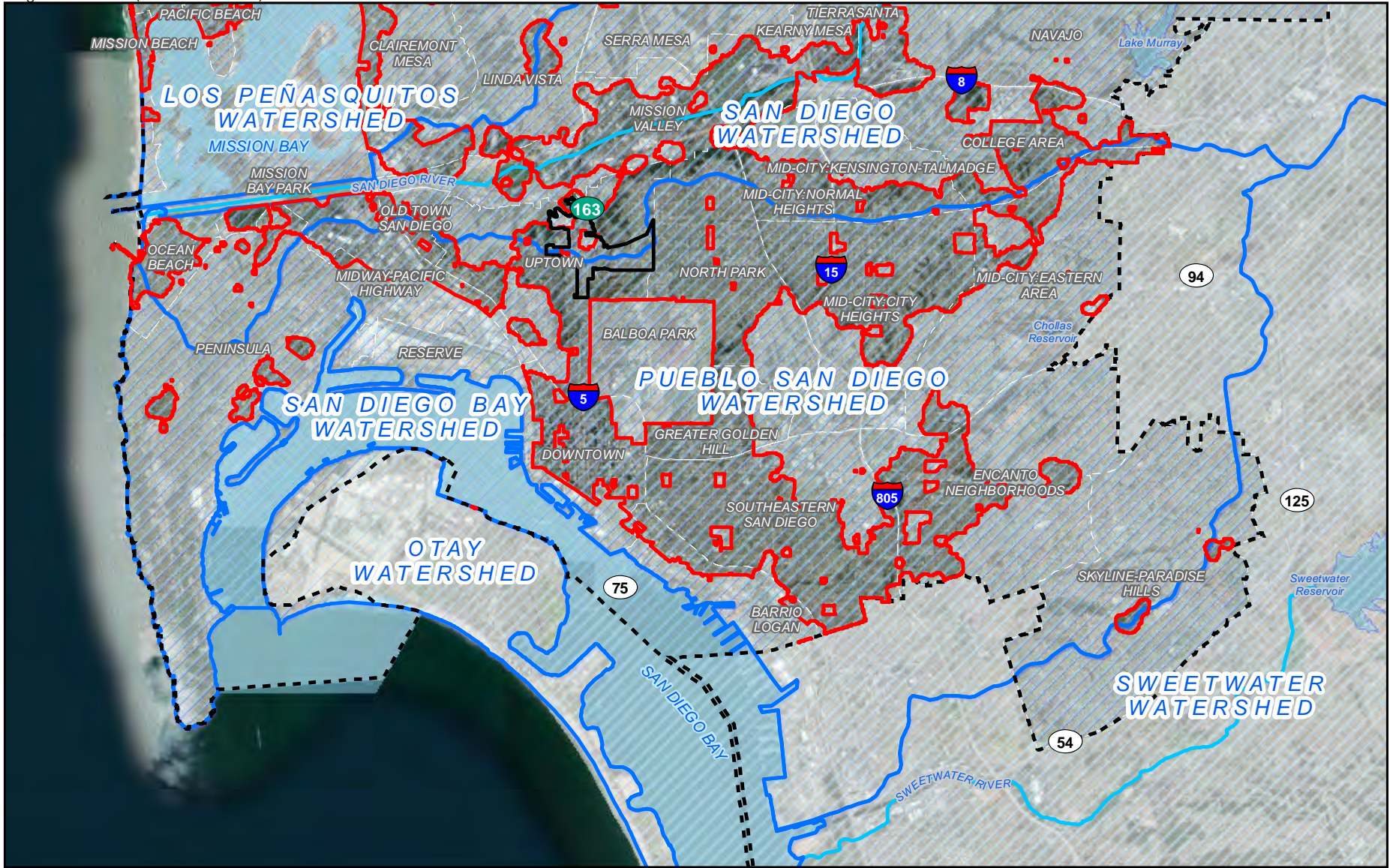








FIGURE 4.9-1a  
Watersheds in Relation to  
the Project Areas - South





-  Hillcrest Focused Plan Amendment Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Watersheds
-  Waterbodies
-  Rivers

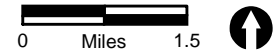
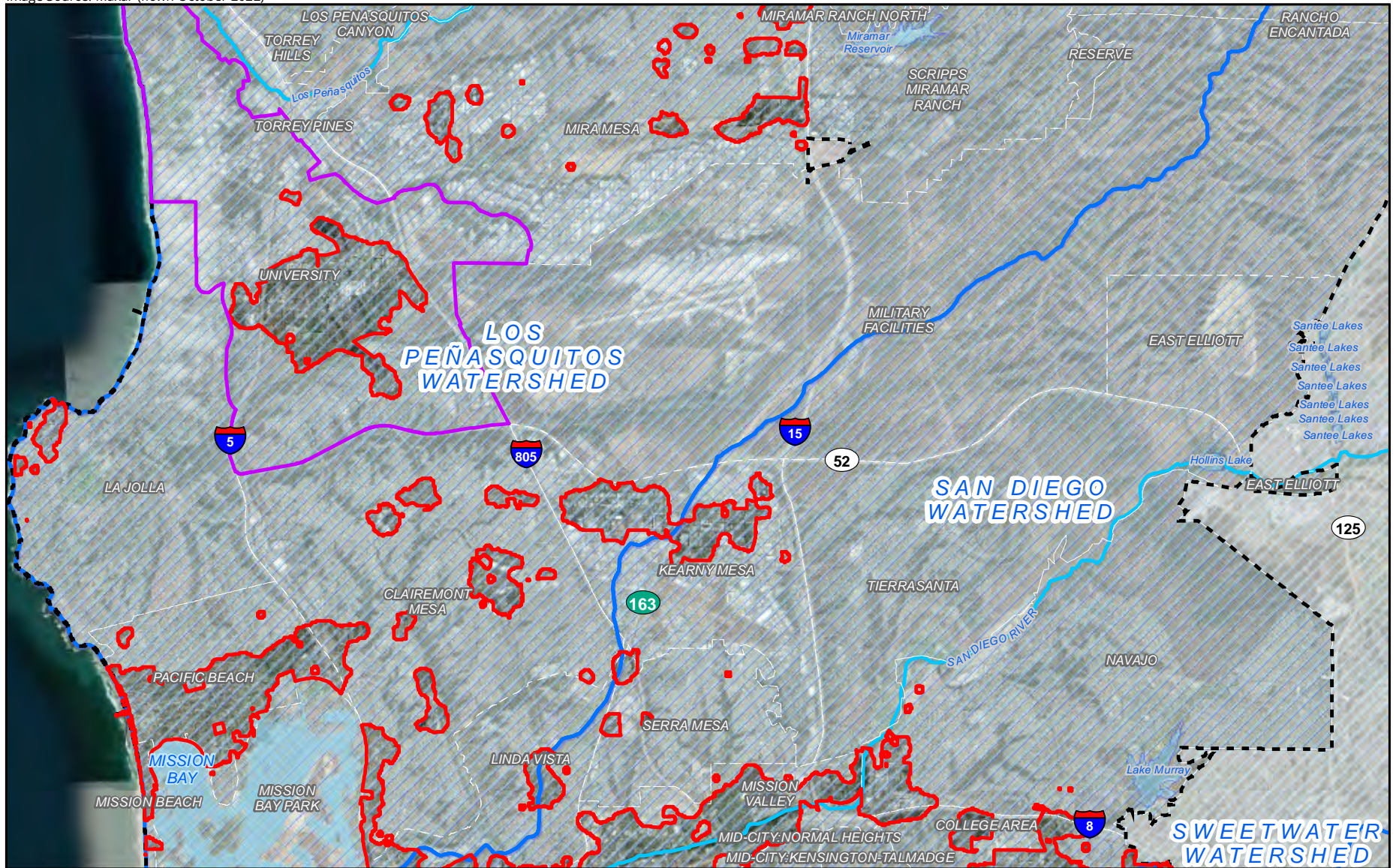








FIGURE 4.9-1b  
Watersheds in Relation to  
the Project Areas - South Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Watersheds
-  Waterbodies
-  Rivers

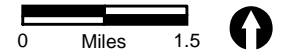
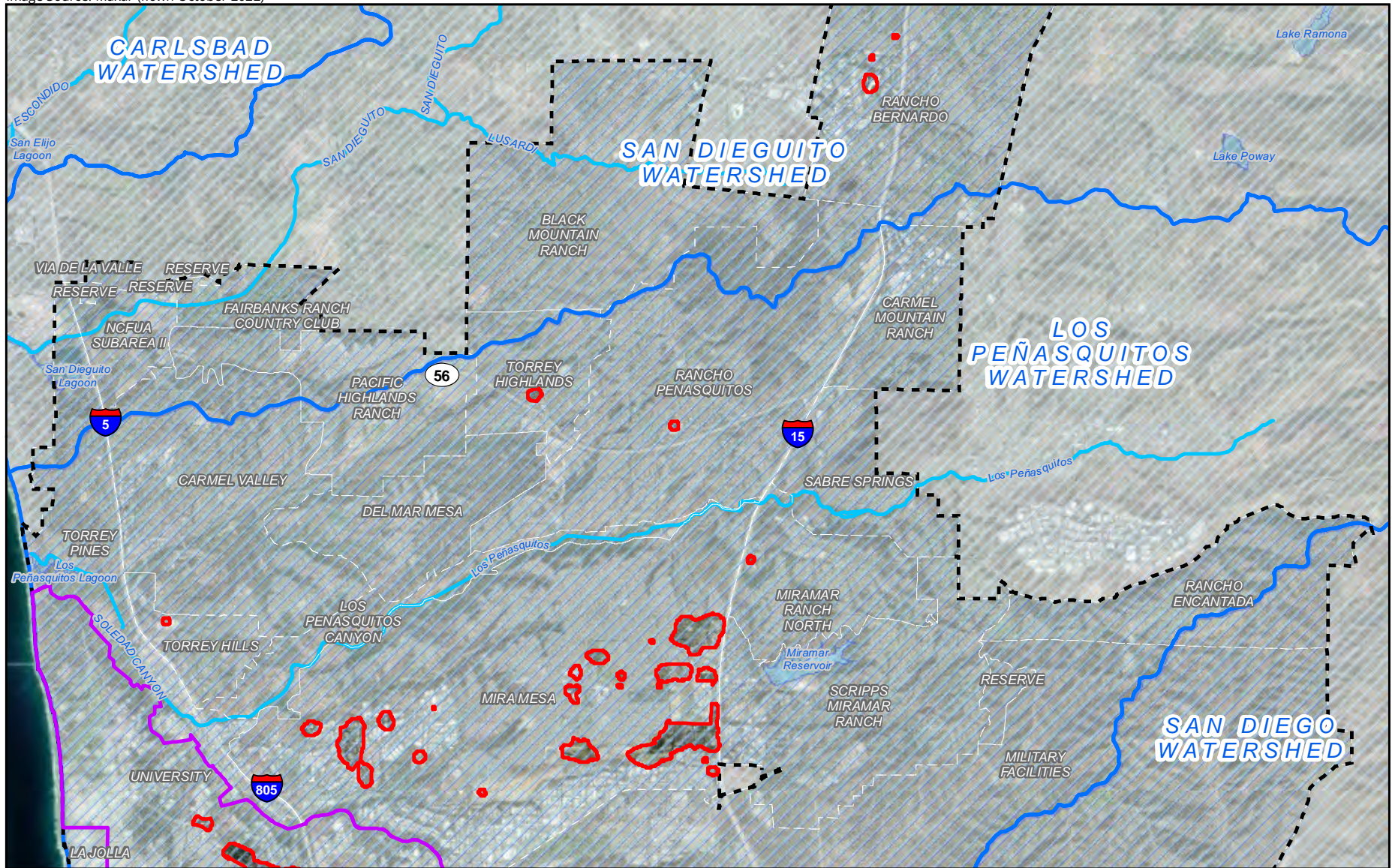








FIGURE 4.9-1c  
Watersheds in Relation to  
the Project Areas - North Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Watersheds
-  Waterbodies
-  Rivers

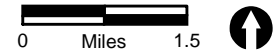
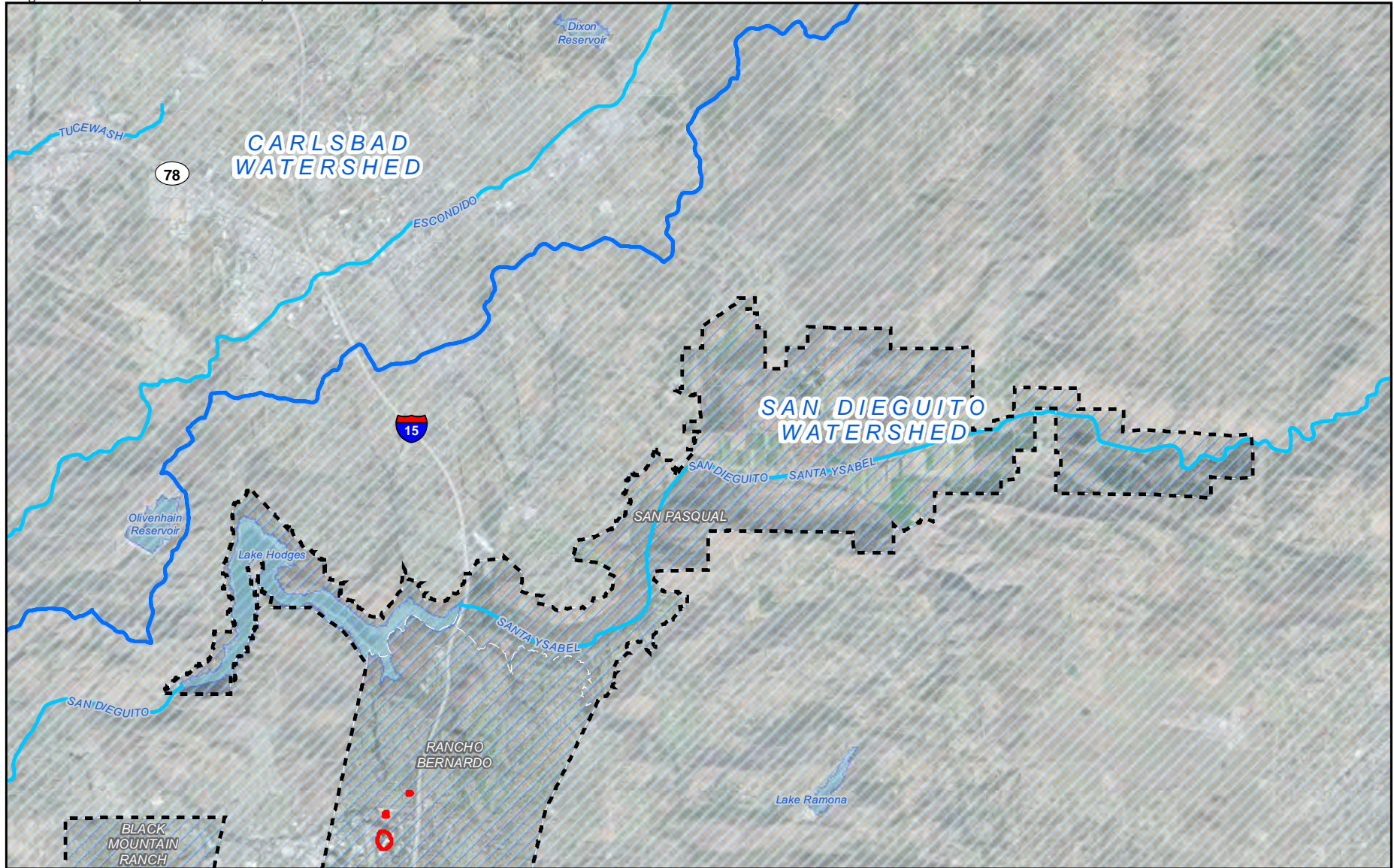







FIGURE 4.9-1d  
Watersheds in Relation to  
the Project Areas - North





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Watersheds
-  Waterbodies
-  Rivers

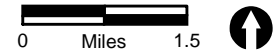


FIGURE 4.9-1e  
Watersheds in Relation to  
the Project Areas - Northeast

### 4.9.1.2 Flooding, Floodplains, and Drainage Conditions

The term “floodplain” refers to the area that experiences flooding during a high flow event. The floodplain includes both actively flowing areas as well as areas that are more ponded and not actively flowing. The “floodway” is the portion of the floodplain—particularly the channel and adjacent areas— that conveys the base or 100-year flood event without increasing flood levels by more than 1 foot and without significantly increasing flood velocities. Additionally, rivers and streams where the Federal Emergency Management Agency (FEMA) has prepared detailed engineering studies may also have designated floodways. FEMA has designated floodways within the City for several waterbodies. Development or other encroachments in the FEMA floodway is severely restricted.

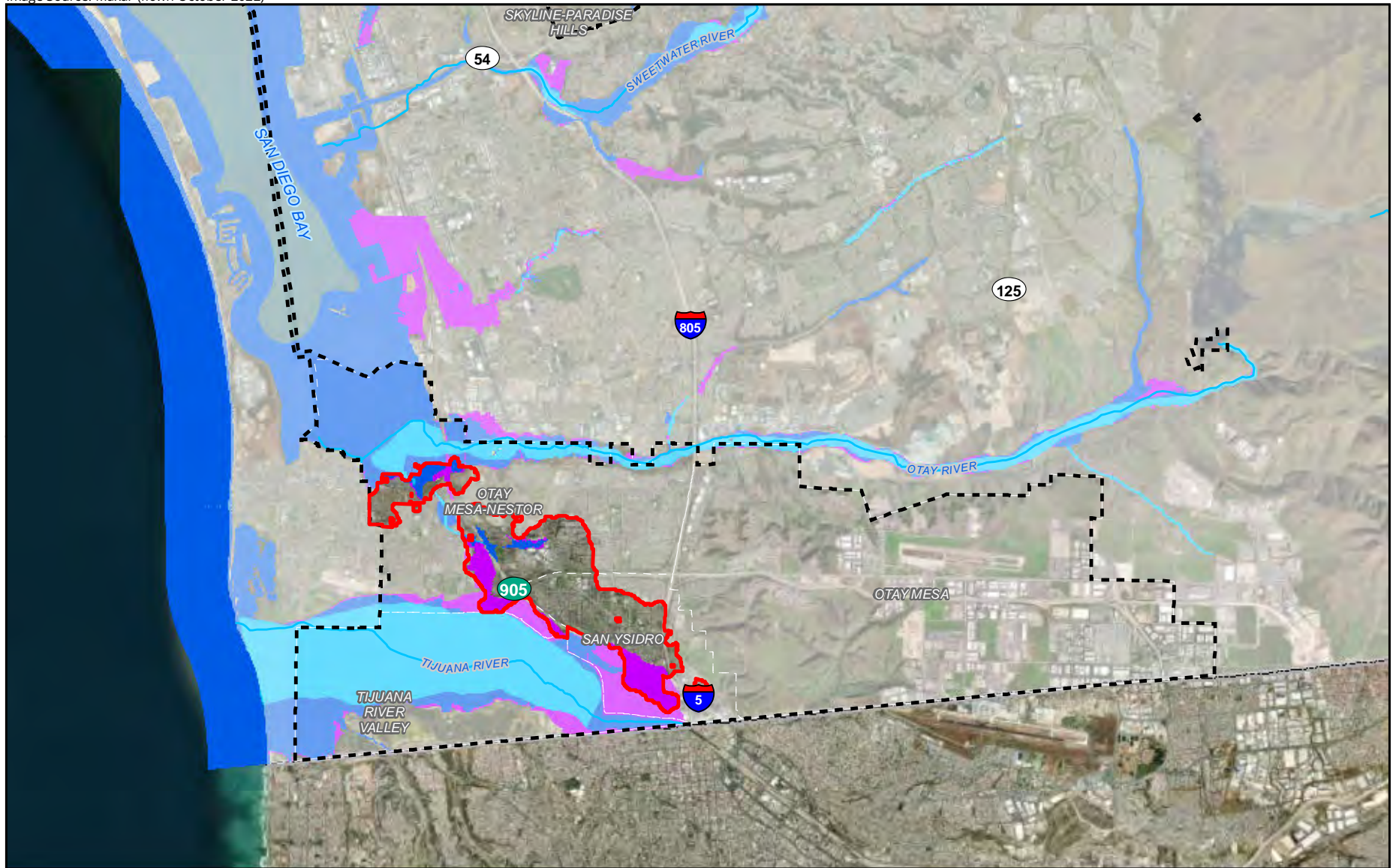
Areas having at least a 1-percent annual chance of flooding are identified by FEMA as Special Flood Hazard Areas (SFHAs). These geographic areas are described in terms of their extent (including both the horizontal area affected and the vertical depth of floodwaters) and related probability of flood occurrence. Flood hazards that could affect the City are based on historical occurrences and best available data from agencies such as FEMA, the U.S. Geological Survey (USGS), the California Geologic Survey, and the National Weather Service.






Figures 4.9-2a through 4.9-2e depict the project areas in relation to 100-year floodways, 100-year floodplains, and 500-year floodplains, which are areas subject to major flooding. The Climate Smart Village Areas contain approximately 833.2 acres within the 100-year floodplain, approximately 1,494.9 acres in the 500-year floodplain, and approximately 360.968 acres in the 100-year floodway. Flood control has been addressed in the City both through engineered flood control channels, as well as floodplain and open space zones that significantly restrict development and protect the public from flood hazards.

As detailed in the Mission Valley CPU Final Environmental Impact Report (FEIR) (City of San Diego 2019), which is hereby incorporated by reference, a large portion of the Mission Valley CPU area (see Figure 4.9-2b), including portions containing Climate Smart Village Areas, are designated Zone X with a Provisionally Accredited Levee (PAL) note. Zone X is not a SFHA (Zone X is designated “Other Flood Areas”). Zone X is not typically subject to the regulations for the flood fringe; however, the PAL designation means that the levee system may lose its accreditation if FEMA does not receive proof of compliance with National Flood Insurance Program (NFIP) Code of Federal Regulations Section 65.10. This designation will remain in effect until the next revision to the flood insurance rate map (FIRM).

The Hillcrest FPA area is not located in a 100-year floodplain, 500-year floodplain, or 100-year floodway, as shown in Figure 4.9-2b.





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  100-year Floodway
-  100-year Floodplain
-  500-year Floodplain

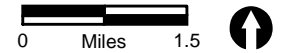
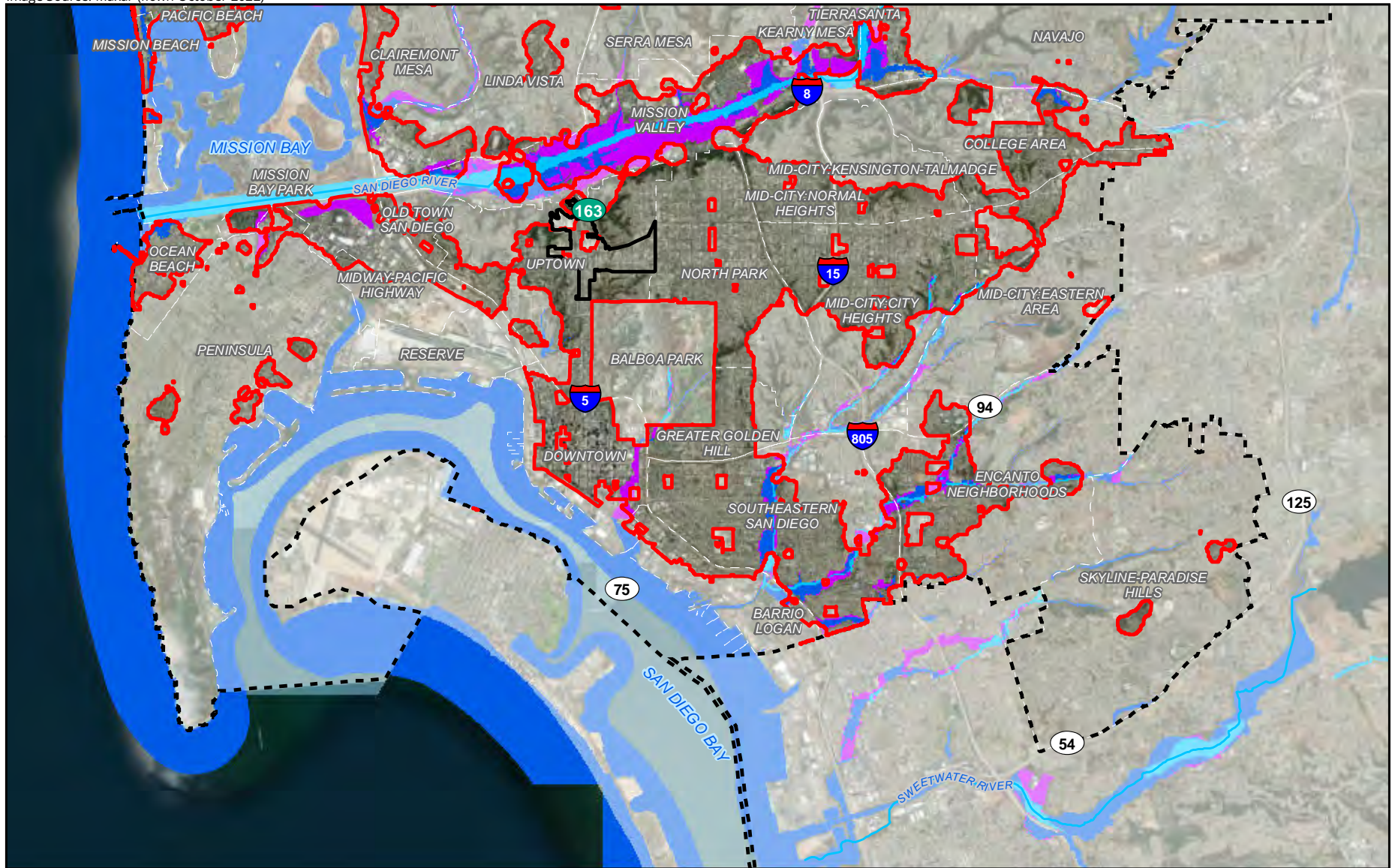


FIGURE 4.9-2a  
Floodplains in Relation to  
the Project Areas - South





- Hillcrest Focused Plan Amendment Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits

- 100-year Floodway
- 100-year Floodplain
- 500-year Floodplain

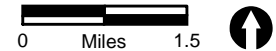
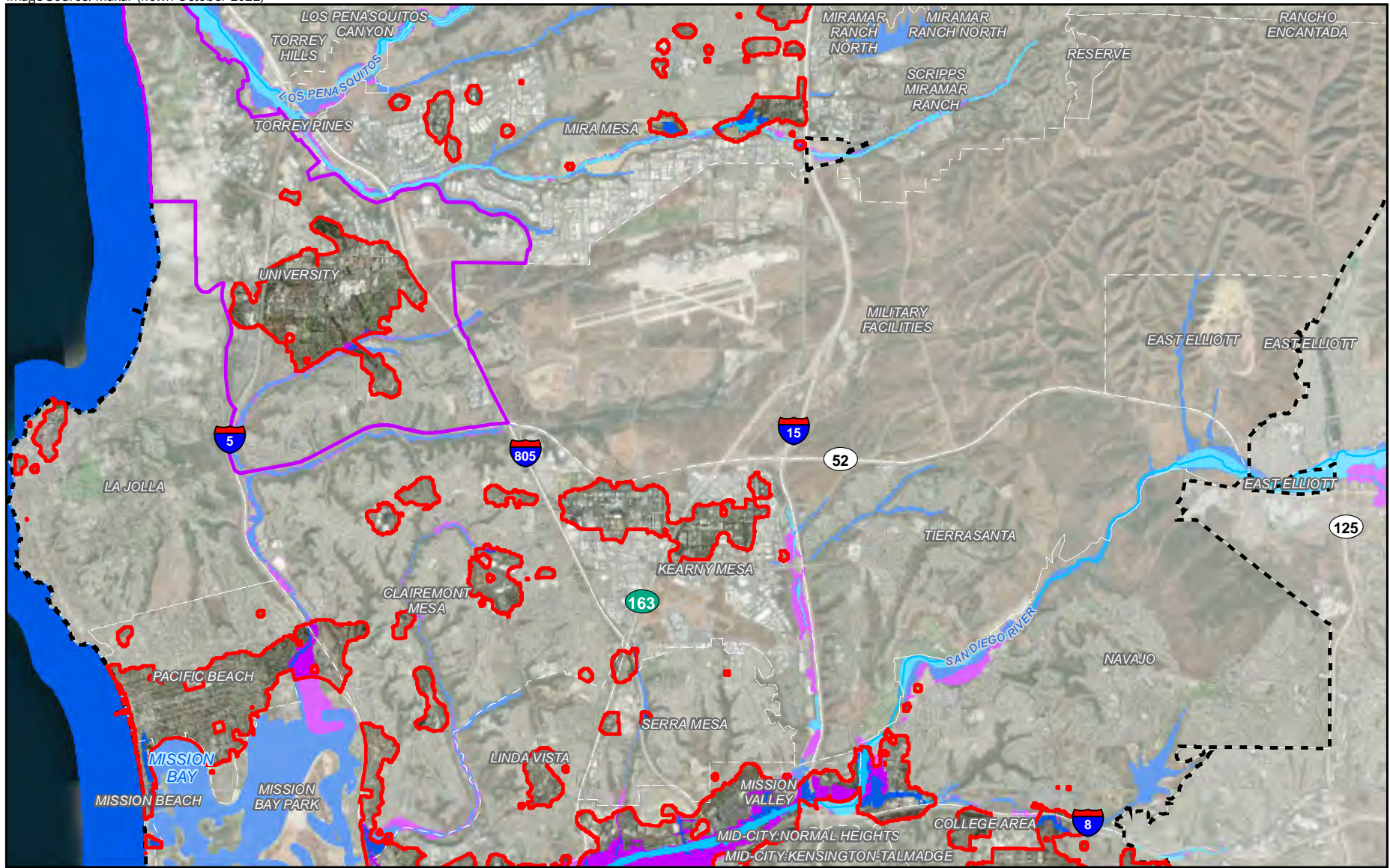








FIGURE 4.9-2b  
Floodplains in Relation to  
the Project Areas - South Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  100-year Floodway
-  100-year Floodplain
-  500-year Floodplain


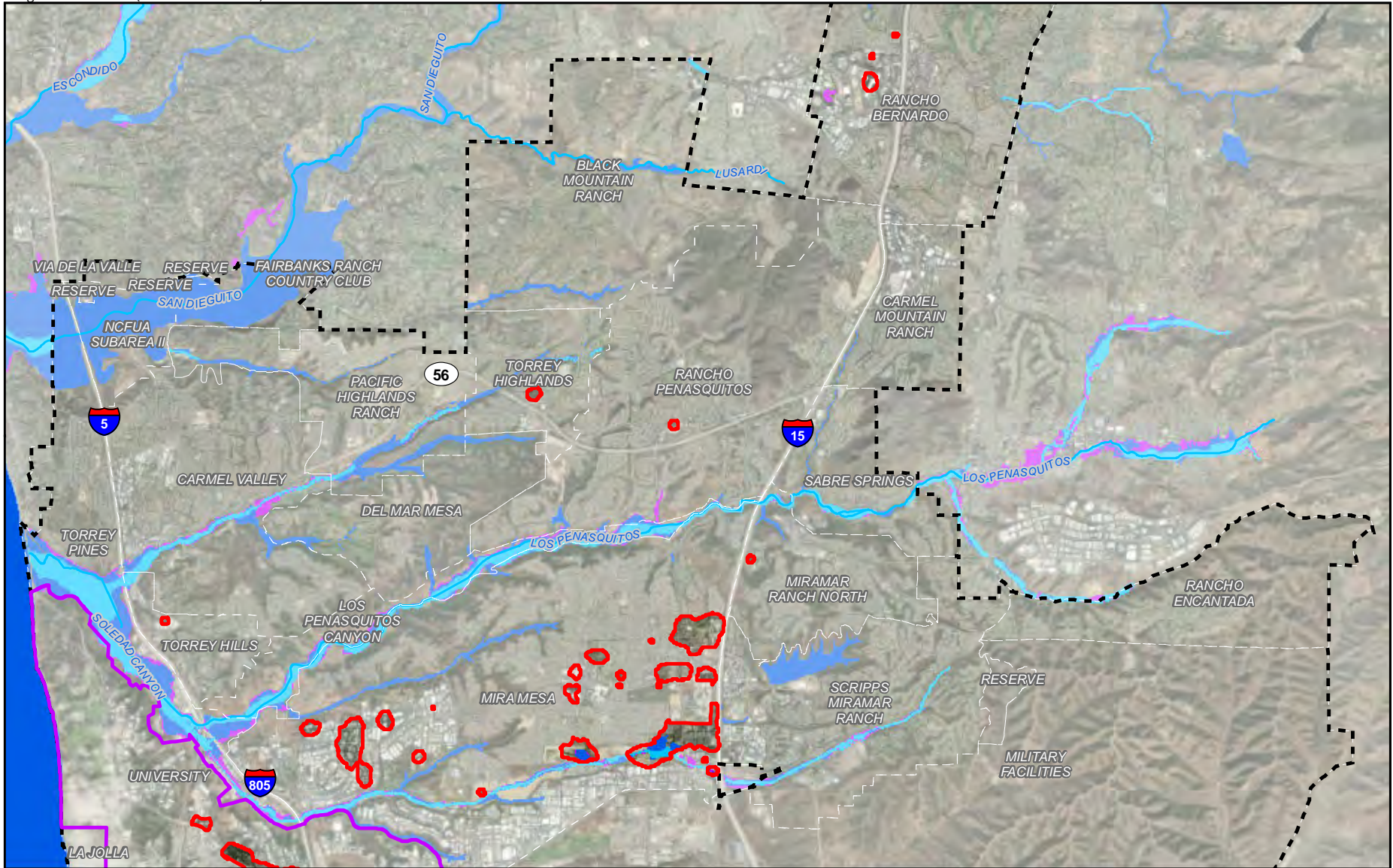






0 Miles 1.5 

FIGURE 4.9-2c  
Floodplains in Relation to  
the Project Areas - North Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  100-year Floodway
-  100-year Floodplain
-  500-year Floodplain

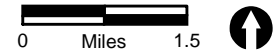
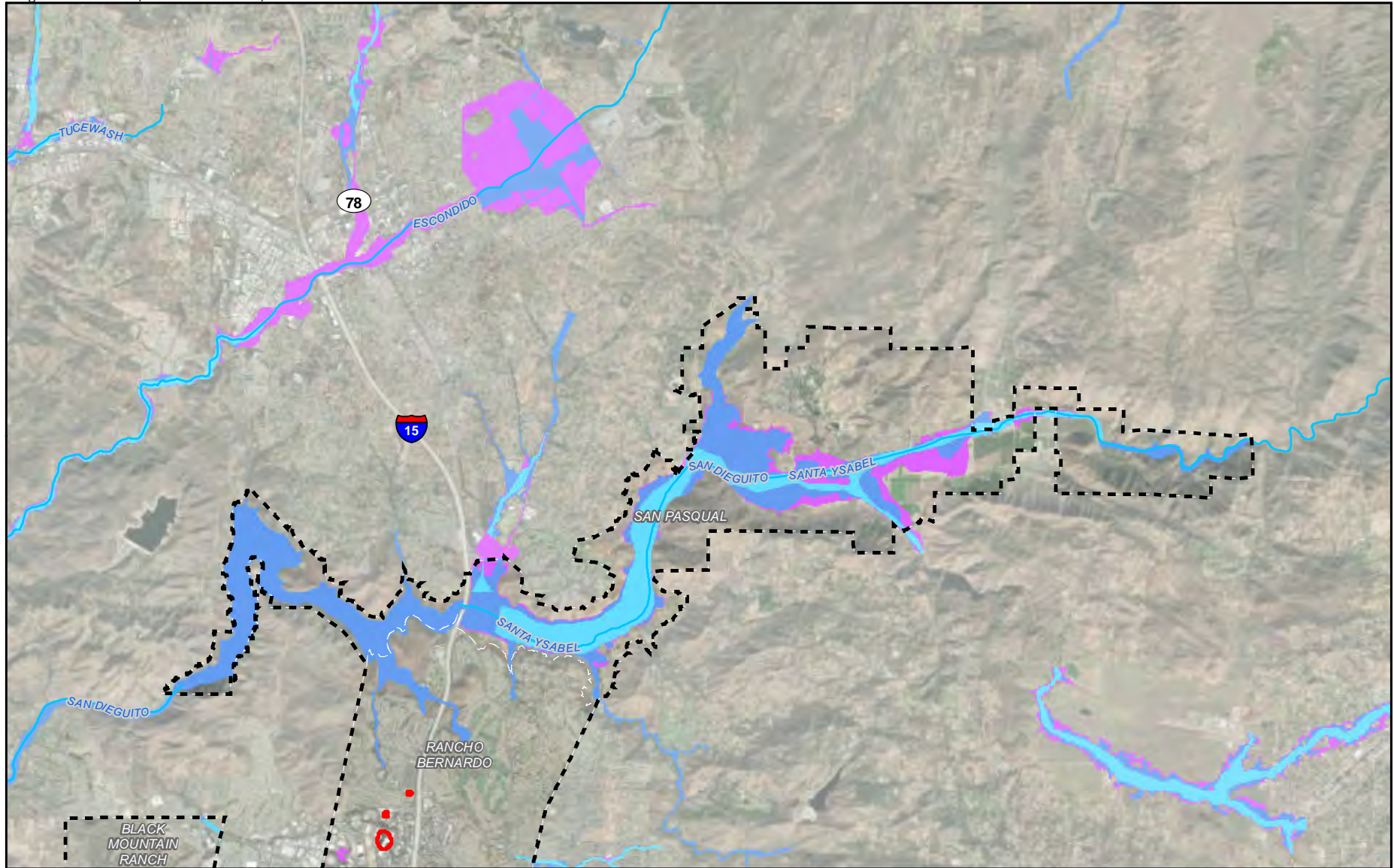







FIGURE 4.9-2d  
Floodplains in Relation to  
the Project Areas - North





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  100-year Floodway
-  100-year Floodplain
-  500-year Floodplain

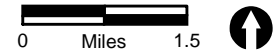


FIGURE 4.9-2e  
Floodplains in Relation to  
the Project Areas - Northeast

The University CPU area contains 2.9 acres within a floodway, 164.4 acres within a 100-year floodplain, and 49 acres within a 500-year floodplain. Figure 4.9-3 depicts the area of Rose Canyon within the University CPU area that contains 100-year floodway, 100-year floodplains, and 500-year floodplains, which are areas subject to major flooding. The three major drainage channels draining through (or directly adjacent to) the University CPU area are Carroll Canyon Creek (which merges with Los Peñasquitos Creek in Sorrento Valley / Soledad Canyon), Rose Canyon Creek, and San Clemente Canyon Creek. There is minimal risk to property within the University CPU area except for the rail line that runs through Rose Canyon that is expected to be partially inundated during the 500-year flood. In addition, there is a tributary near Genesee Avenue that is mapped as Zone A and that has the potential to flood University City High School, east of the road.

Provided below is a summary of locations in the University CPU area that are within the 100-year floodplain of Rose Canyon Creek and its tributaries:

- Railway in numerous locations:
  - In between I-805 & Nobel Drive
  - Adjacent to I-5 & La Jolla Colony Drive north of Gilman Drive
  - Adjacent to I-5 from Gilman Drive to where it joins San Clemente Canyon
- Private unpaved roads east of I-805
- University City High School
- Small section of Genesee Avenue at Luigi Terrace (near University City High School)
- Rose Canyon Bicycle Path

Provided below is a list of locations in the University CPU area that are within the FEMA 100-year floodplain of Carroll Canyon Creek:

- A small section of the railway near Nancy Ridge Drive is affected by a tributary of Carroll Canyon Creek.
- Soledad Canyon/Sorrento Valley Channel

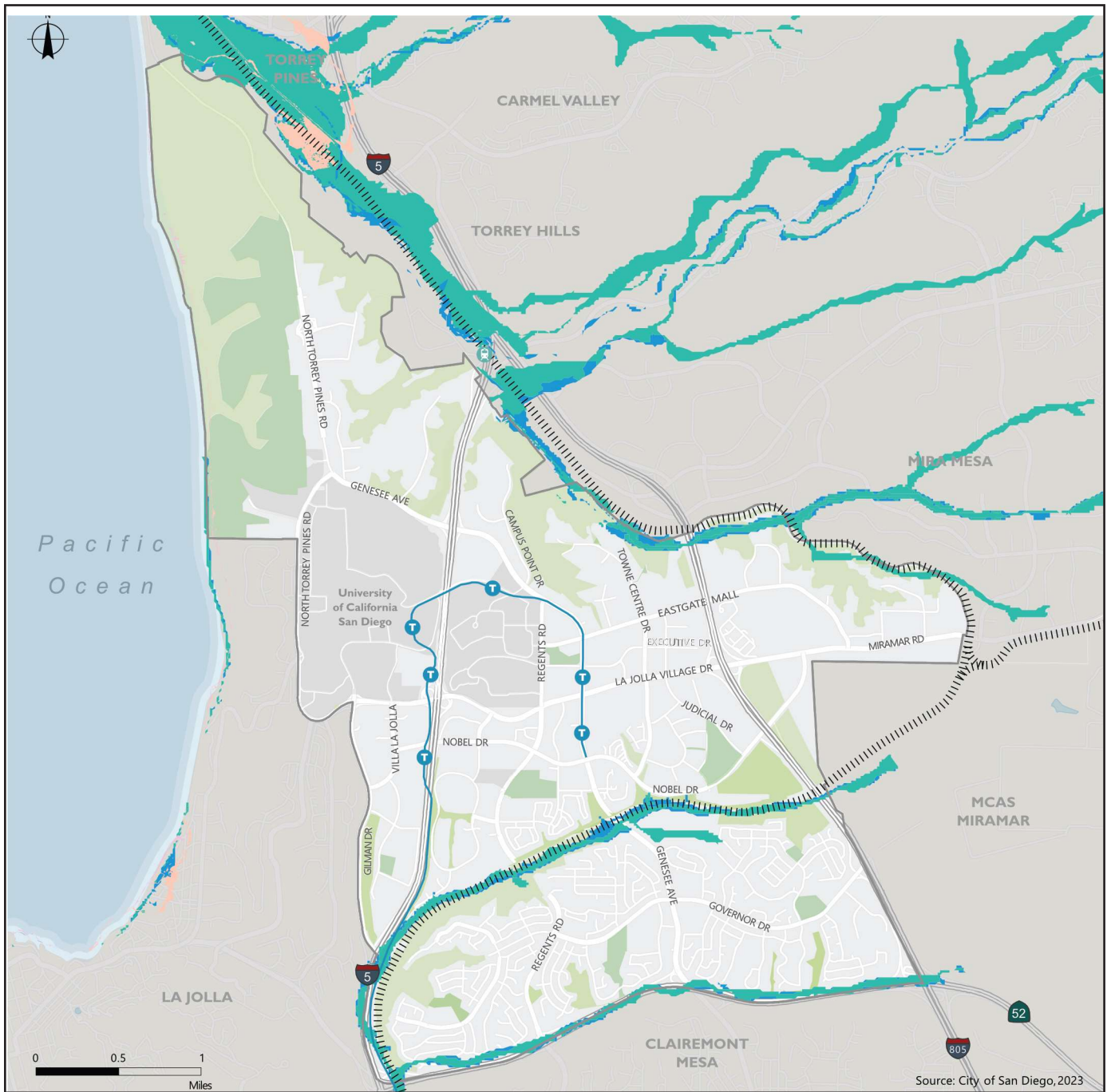
Los Peñasquitos Creek and Carroll Canyon Creek flow west through the northern portion of the City of San Diego, forming Soledad Canyon. Carmel Creek flows west, joining Soledad Canyon near its outlet to the Pacific Ocean, just south of the City of Del Mar. Sorrento Valley is highly developed with both commercial and industrial development, as well as transportation infrastructure within the floodplain extents. Frequent flooding has occurred at multiple locations in Sorrento Valley due to natural erosion and sedimentation processes resulting from the area's topography, and undersized stormwater infrastructure, causing damages and loss of revenues for businesses in the area.

Common flood areas in Sorrento Valley include the following:

- Intersection of Sorrento Valley Road and Carmel Mountain Road
- Roselle Street
- Industrial Park southwest of channel near Los Peñasquitos Creek

Areas within the FEMA 100-year floodplain of Soledad Canyon include the following:

- General Atomics industrial park near I-805 and I-5 interchange
- Multiple sections of Flintkote Avenue near Torrey Pines Road



Source: City of San Diego, 2023

FEMA Flood Zone

- 100-year flood
- 500-year flood

Sea Level Rise - Storm Surge 100yr

- 0.25 m
- 0.5 m
- 1 m
- 1.5 m

FIGURE 4.9-3

Floodplains in Relation to University Community Plan Update Area



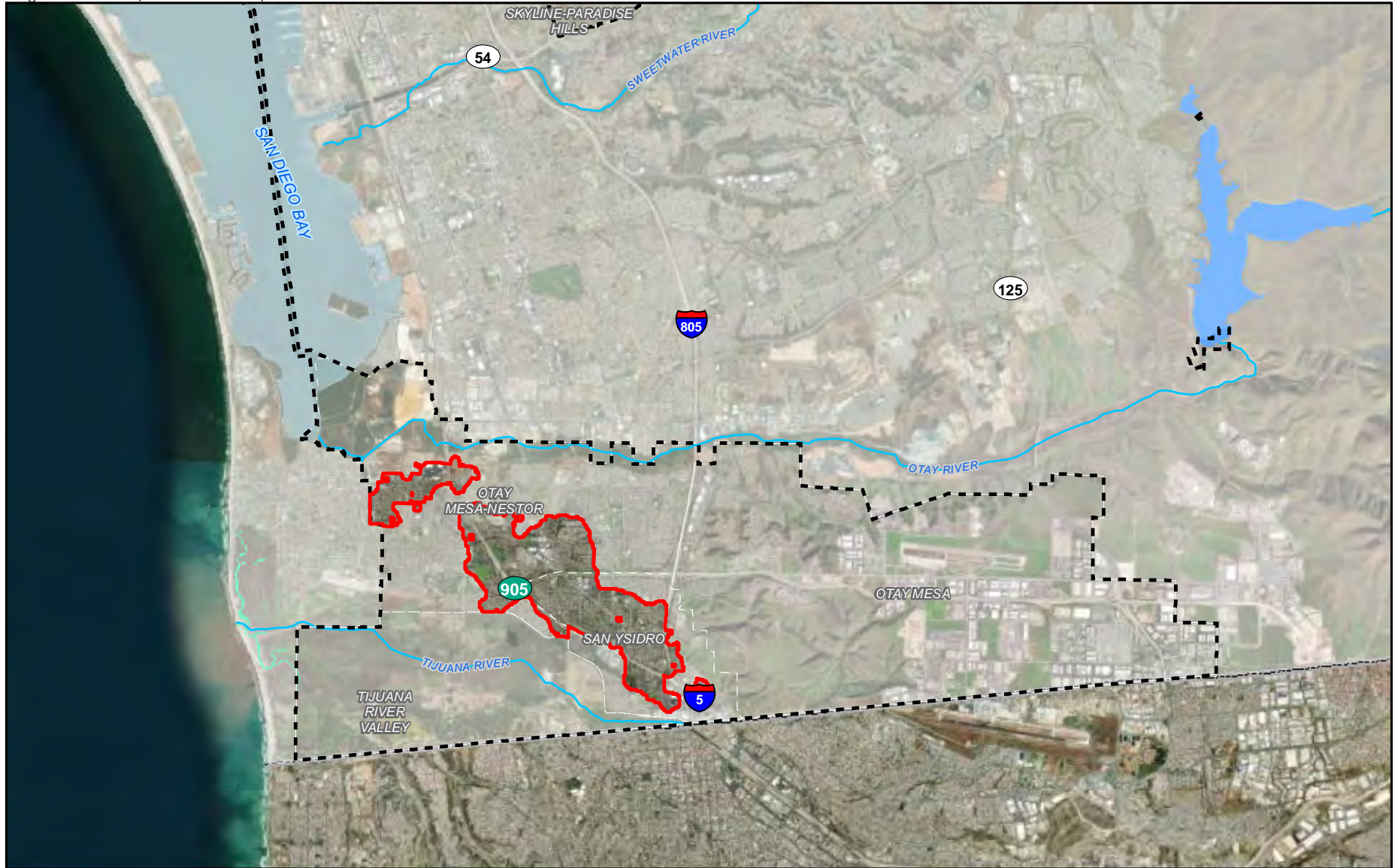
### 4.9.1.3 Dam Inundation Areas






Waterways within the project areas are shown on Figure 4.9-4a through 4.9-4e. Several waterways in the region have dams installed creating larger water bodies for recreation and potable water use, among other uses. Dam failure is the collapse or failure of an impoundment that causes significant downstream flooding. Flooding of the area below the dam may occur as the result of structural failure or overtopping of the dam. There are several dams within the proposed project areas. The Blueprint SD Initiative Climate Smart Village Areas are within the inundation pathway of a number of dams as shown in Figure 4.9-5a through e and Table 4.9-1. The Hillcrest FPA area is not located within a dam inundation area. Approximately 21.5 acres of the University CPU area are located in the Miramar Dam inundation area, as shown in Figure 4.9-5c and Figure 4.9-5d.

Blueprint Dam Inundation	Acreage
Barrett Dam	382.3
Chet Harritt Dam	1029.0
Chollas Dam	29.6
Cuyamaca Dam	445.6
El Capitan Dam	2734.9
Grossmont Dam	266.1
Miramar Dam	164.6
Morena Overtopping Barrett	382.3
Murray Dam	1337.0
Rodriguez Reservoir	980.7
San Vicente Dam	2550.3
Upper & Lower Otay Dams	152.2
<b>TOTAL</b>	<b>10,454.8</b>
Note: Totals may vary due to independent rounding.	

### 4.9.1.4 Tsunami and Seiche

A tsunami is a sea wave generated by a submarine earthquake, landslide, or volcanic action. A seiche is an earthquake-induced wave in a confined body of water, such as a lake, reservoir, or bay. There are no waterways within the project areas large enough to create hazardous seiche conditions. Approximately 478.1 acres of the Climate Smart Village Areas along the coast lies within a tsunami inundation zone as shown in Figures 4.9-6a through 4.9-6e. The Hillcrest FPA area is not located within any tsunami inundation zones. Approximately 53.1 acres of the University CPU area are located within a tsunami zone, as shown in Figures 4.9-6c and 4.9-6d. No area within the City is subject to risk of inundation due to seiche.



-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Rivers
-  Lakes
-  Lagoons

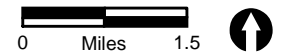
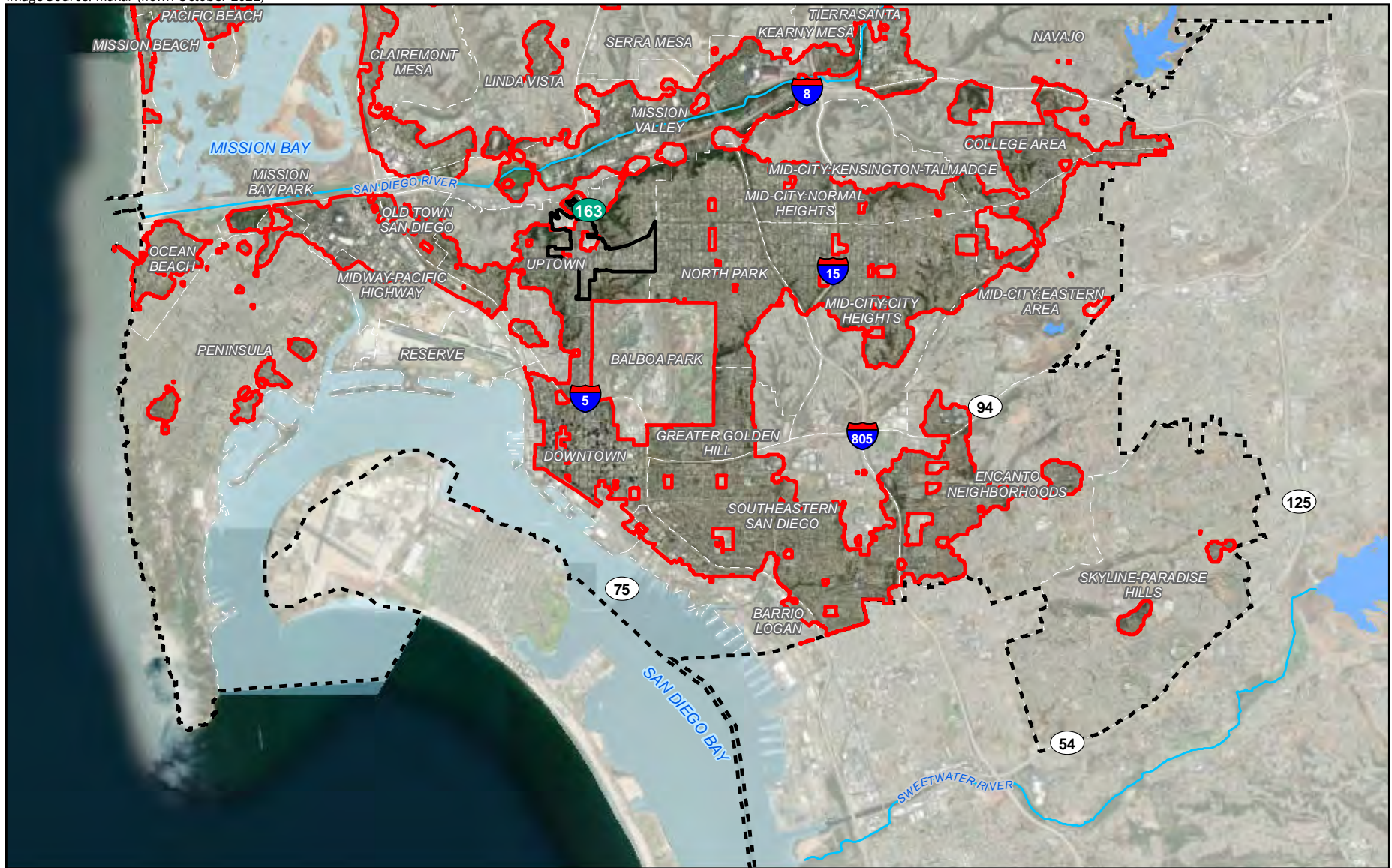







FIGURE 4.9-4a  
Waterways in Relation to  
the Project Areas - South





-  Hillcrest Focused Plan Amendment Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Rivers
-  Lakes

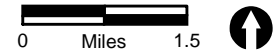
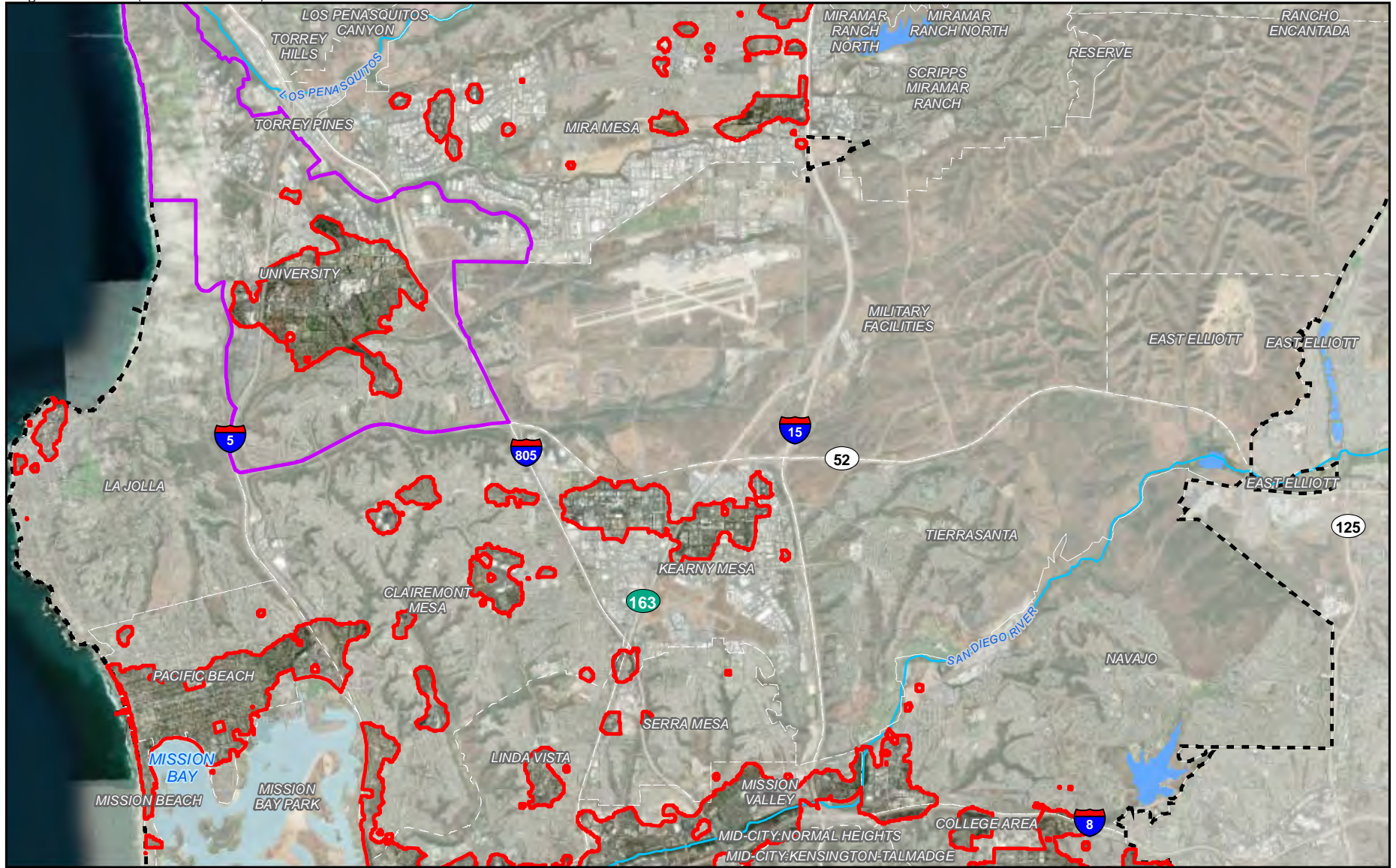







FIGURE 4.9-4b  
Waterways in Relation to  
the Project Areas - South Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Rivers
-  Lakes

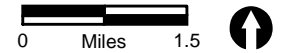
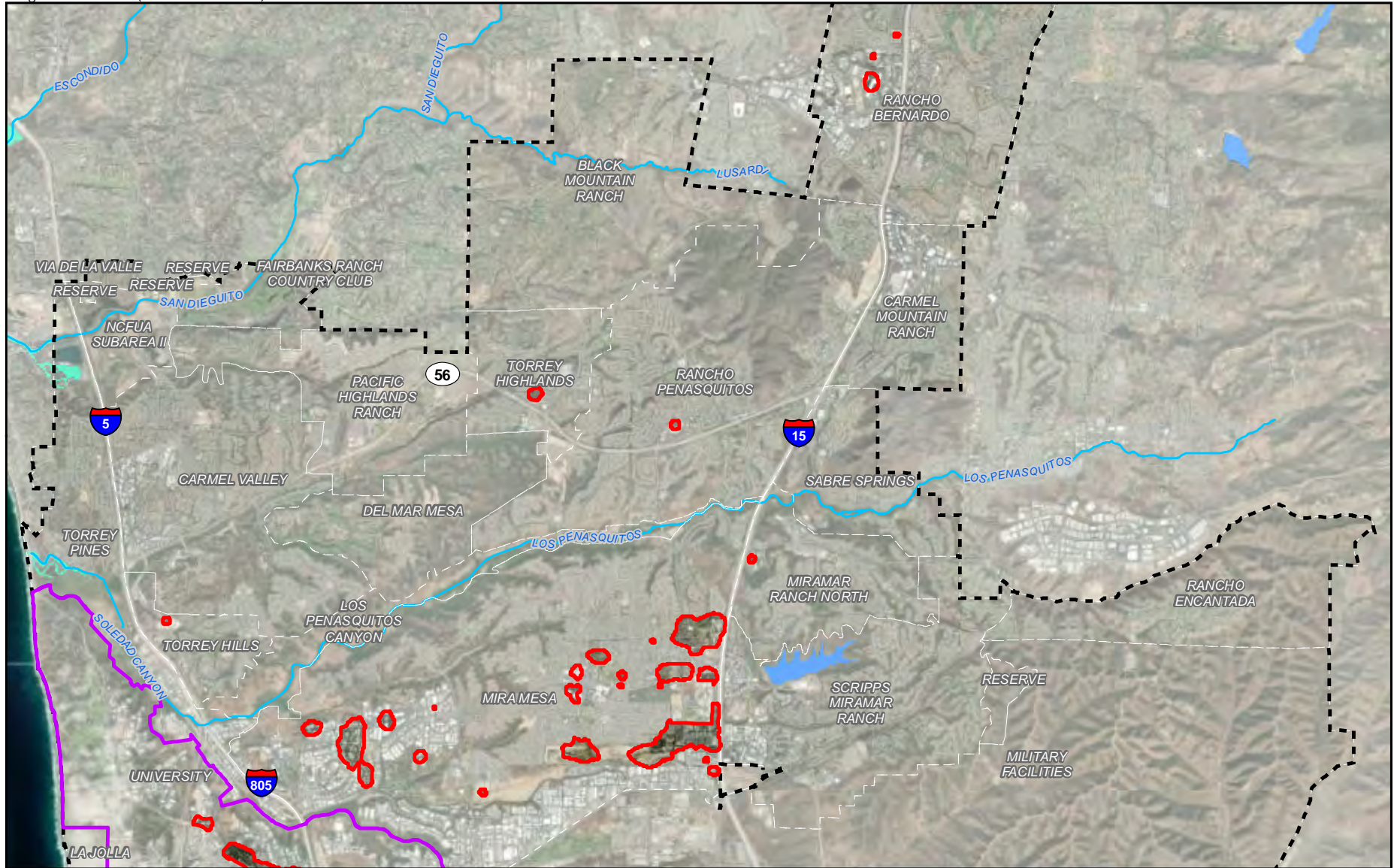








FIGURE 4.9-4c  
Waterways in Relation to  
the Project Areas - North Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Rivers
-  Lakes
-  Lagoons

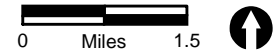
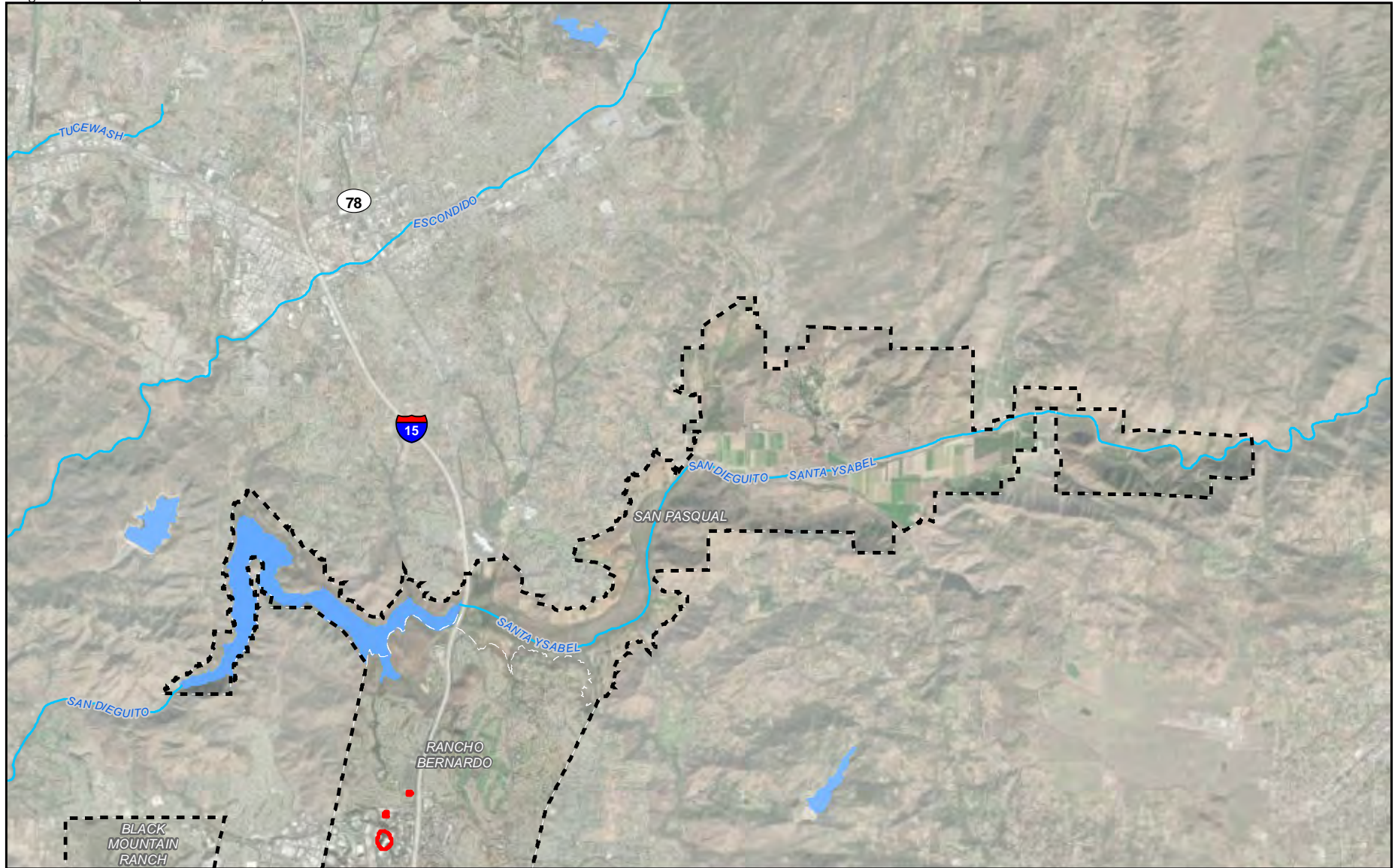






FIGURE 4.9-4d  
Waterways in Relation to  
the Project Areas - North





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Rivers
-  Lakes

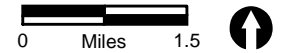
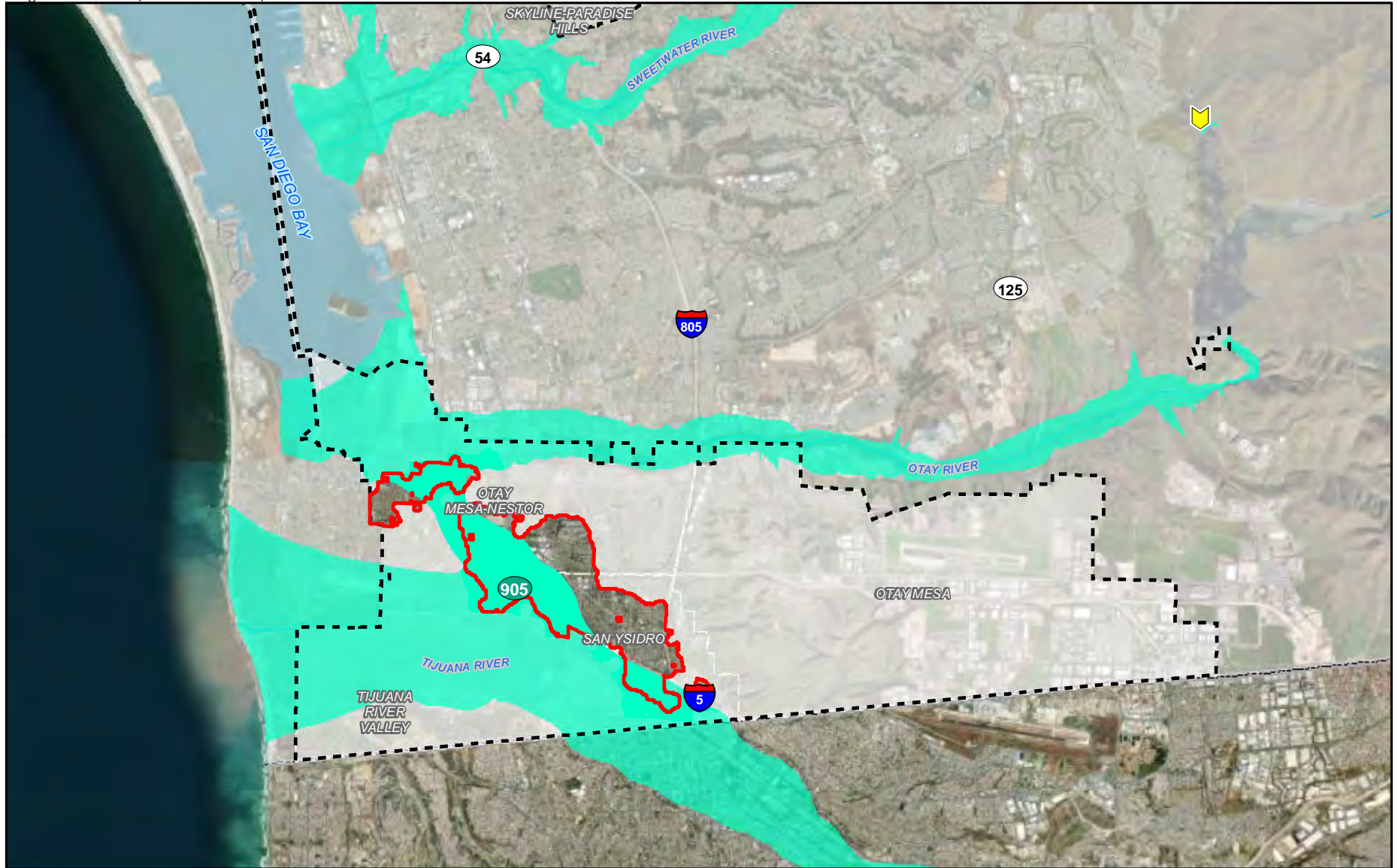






FIGURE 4.9-4e  
Waterways in Relation to  
the Project Areas - Northeast



-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Dam
-  Dam Inundation Area

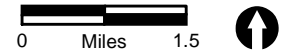
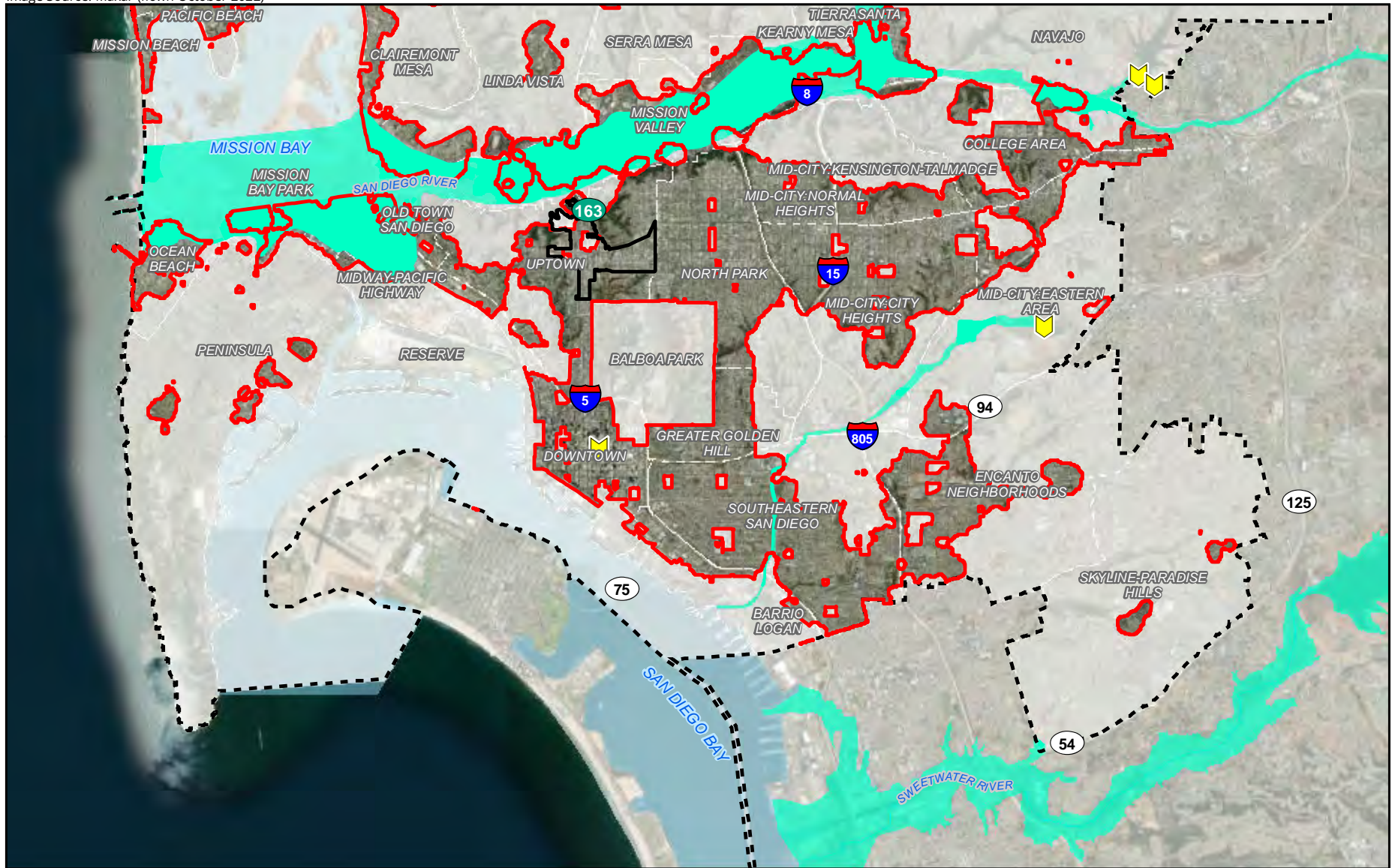







FIGURE 4.9-5a  
Dam Inundation Areas in Relation to  
the Project Areas - South





-  Hillcrest Focused Plan Amendment Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Dam
-  Dam Inundation Area

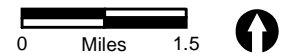
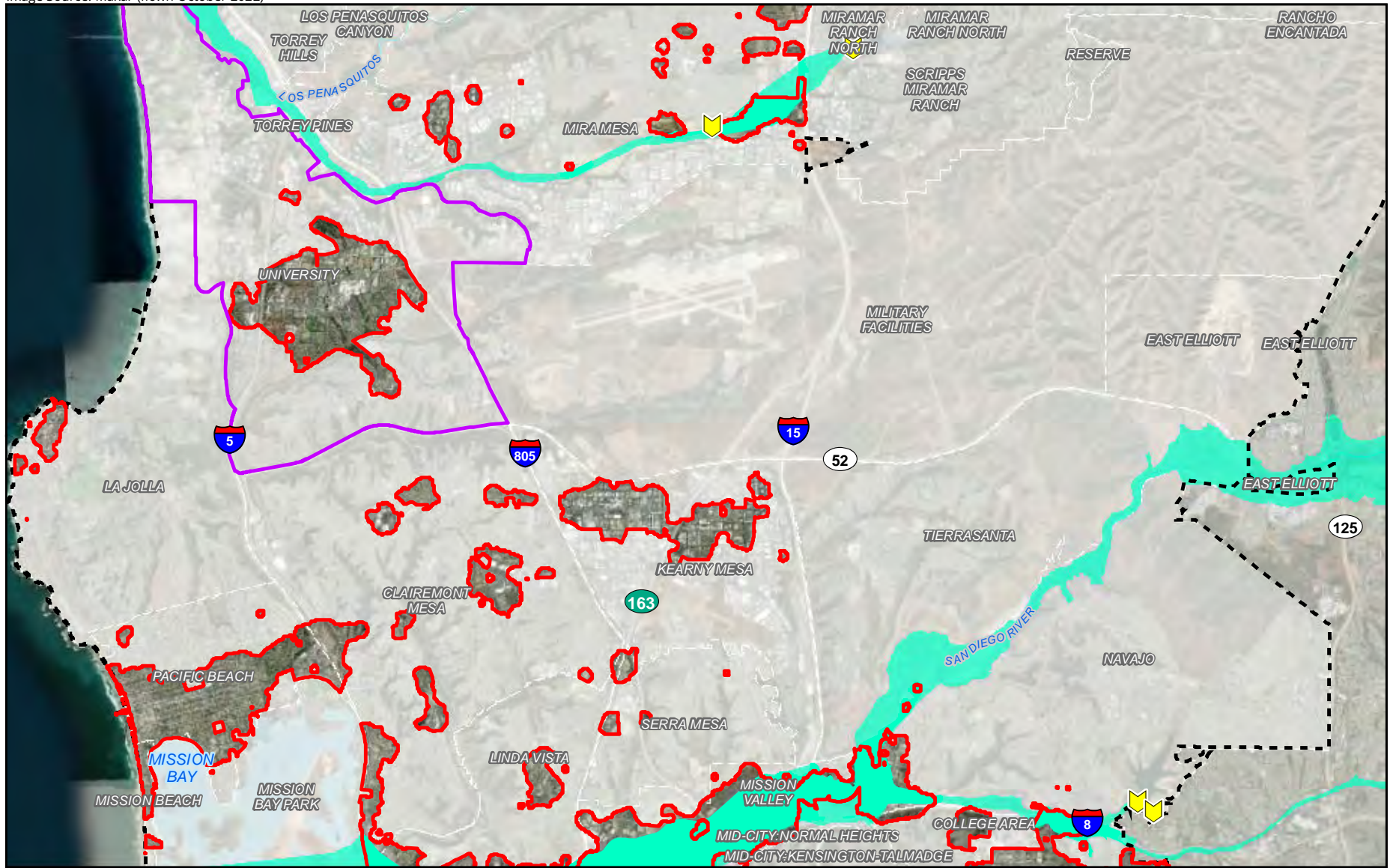







FIGURE 4.9-5b  
Dam Inundation Areas in Relation to  
the Project Areas - South Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Dam
-  Dam Inundation Area

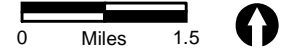
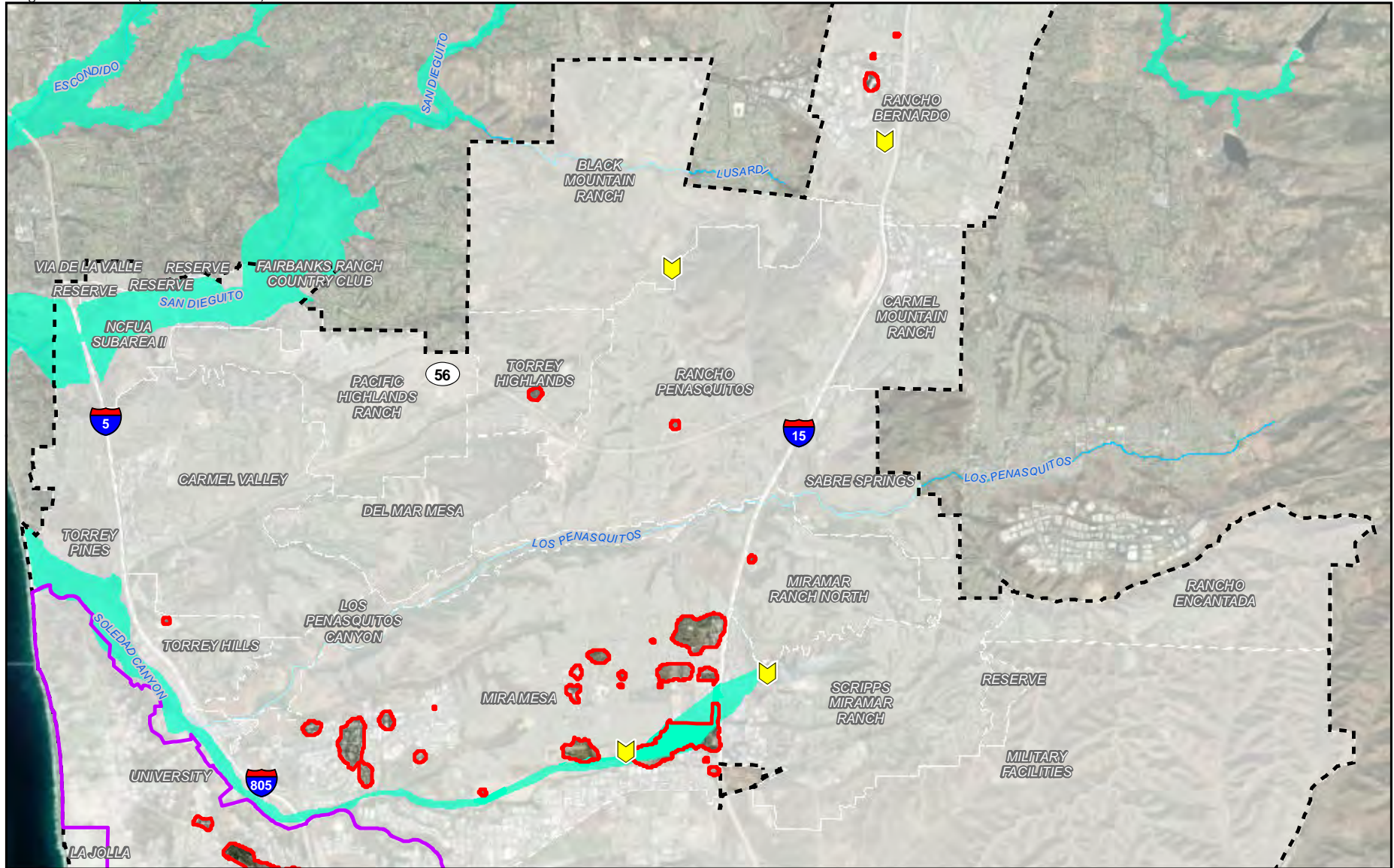







FIGURE 4.9-5c  
Dam Inundation Areas in Relation to  
the Project Areas - North Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Dam
-  Dam Inundation Area

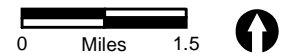
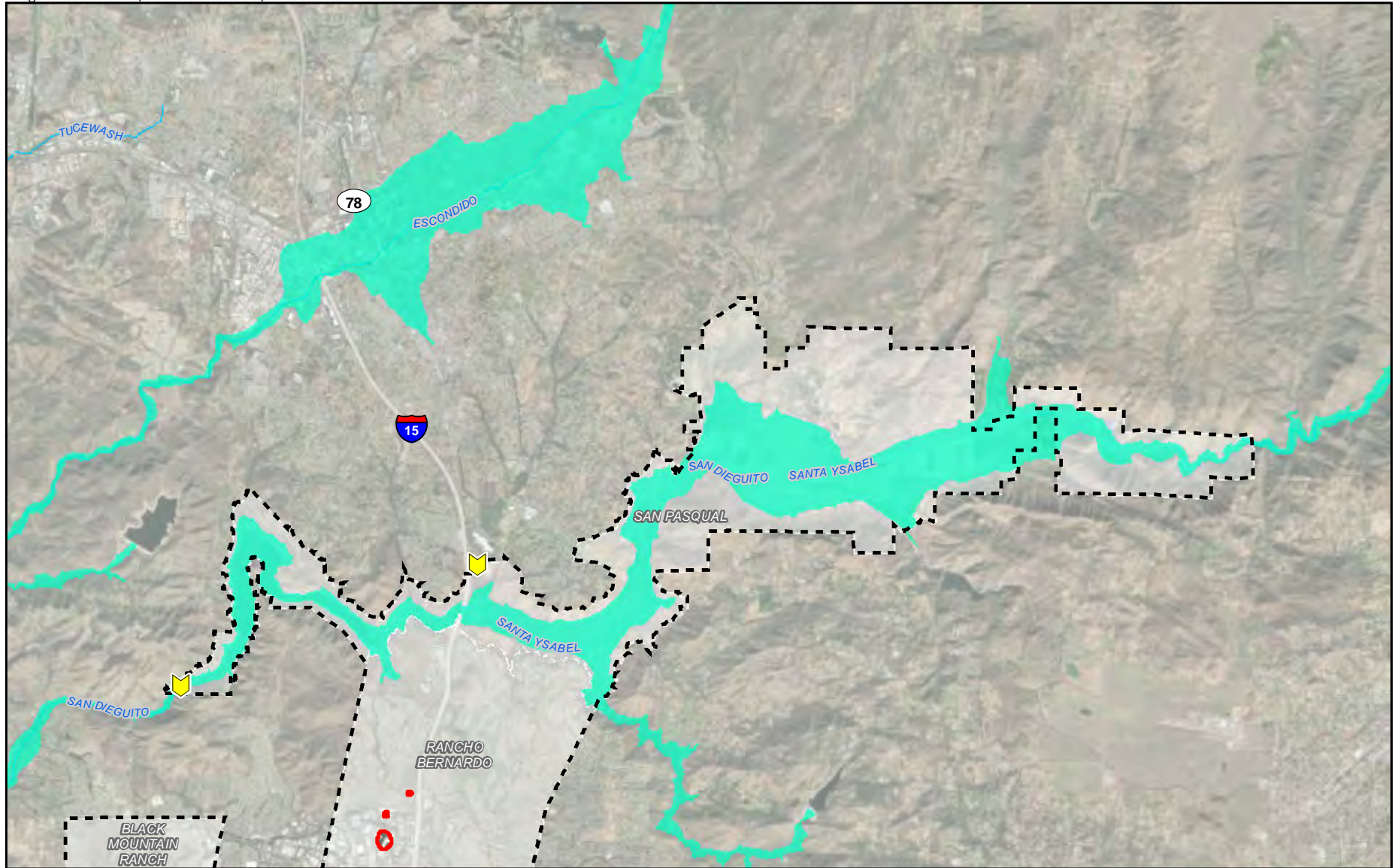






FIGURE 4.9-5d  
Dam Inundation Areas in Relation to  
the Project Areas - North





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Dam
-  Dam Inundation Area

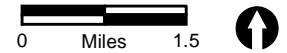
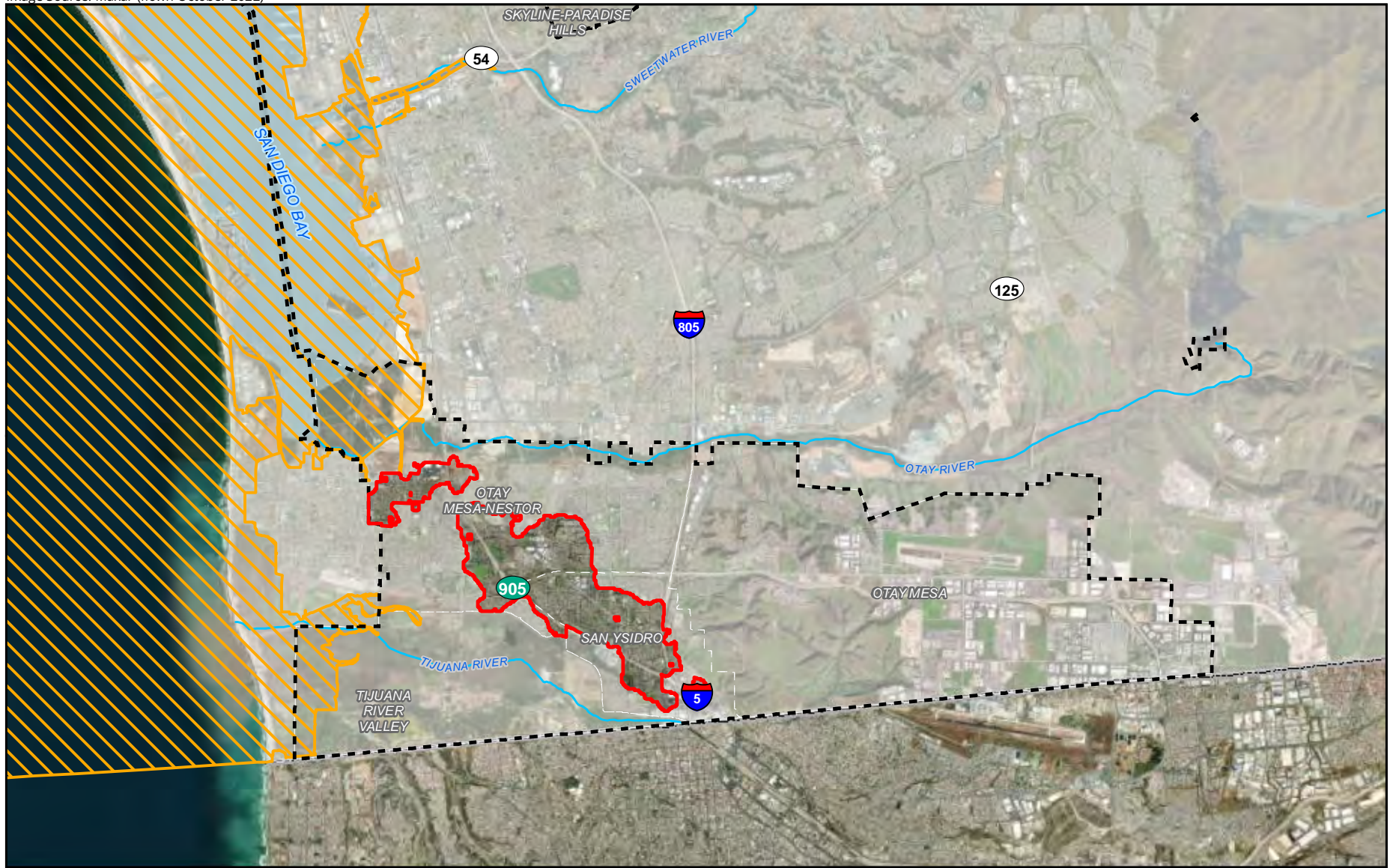





FIGURE 4.9-5e  
Dam Inundation Areas in Relation to  
the Project Areas - Northeast





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Tsunami Inundation Zone

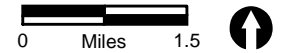
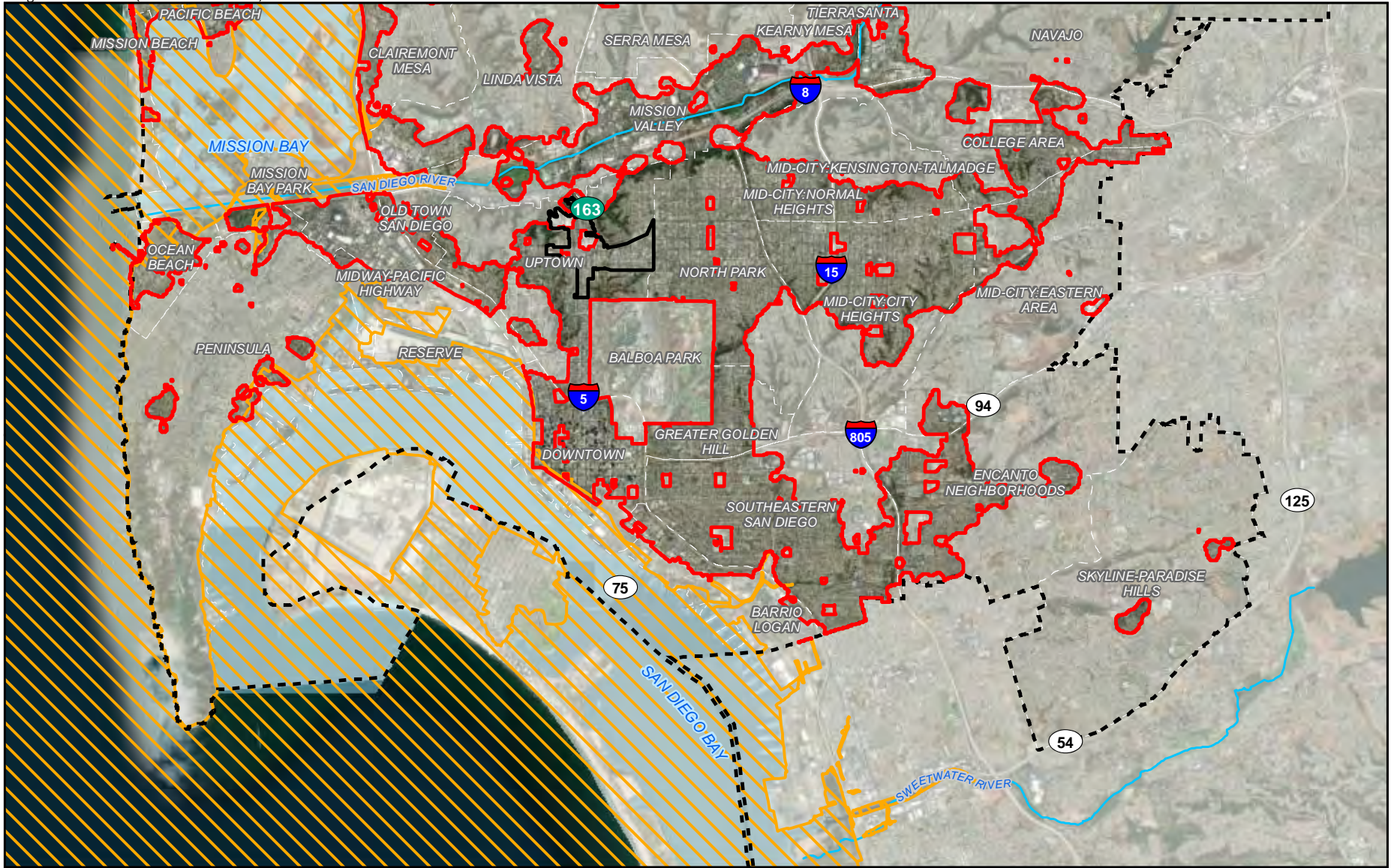






FIGURE 4.9-6a  
Tsunami Inundation Zones in Relation to  
the Project Areas - South





-  Hillcrest Focused Plan Amendment Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Tsunami Inundation Zone

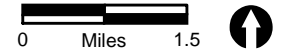
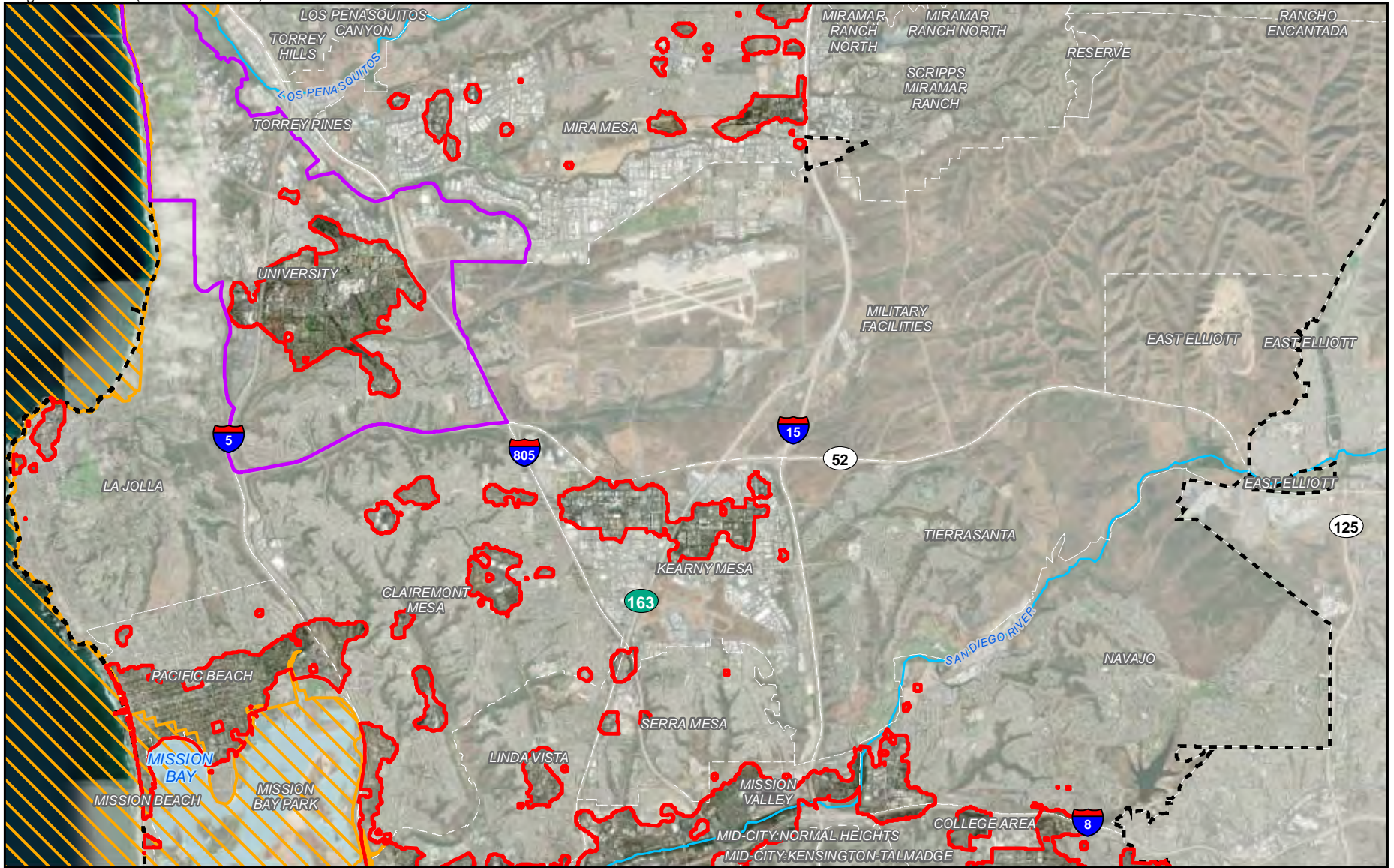






FIGURE 4.9-6b  
Tsunami Inundation Zones in Relation to  
the Project Areas - South Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Tsunami Inundation Zone

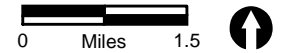
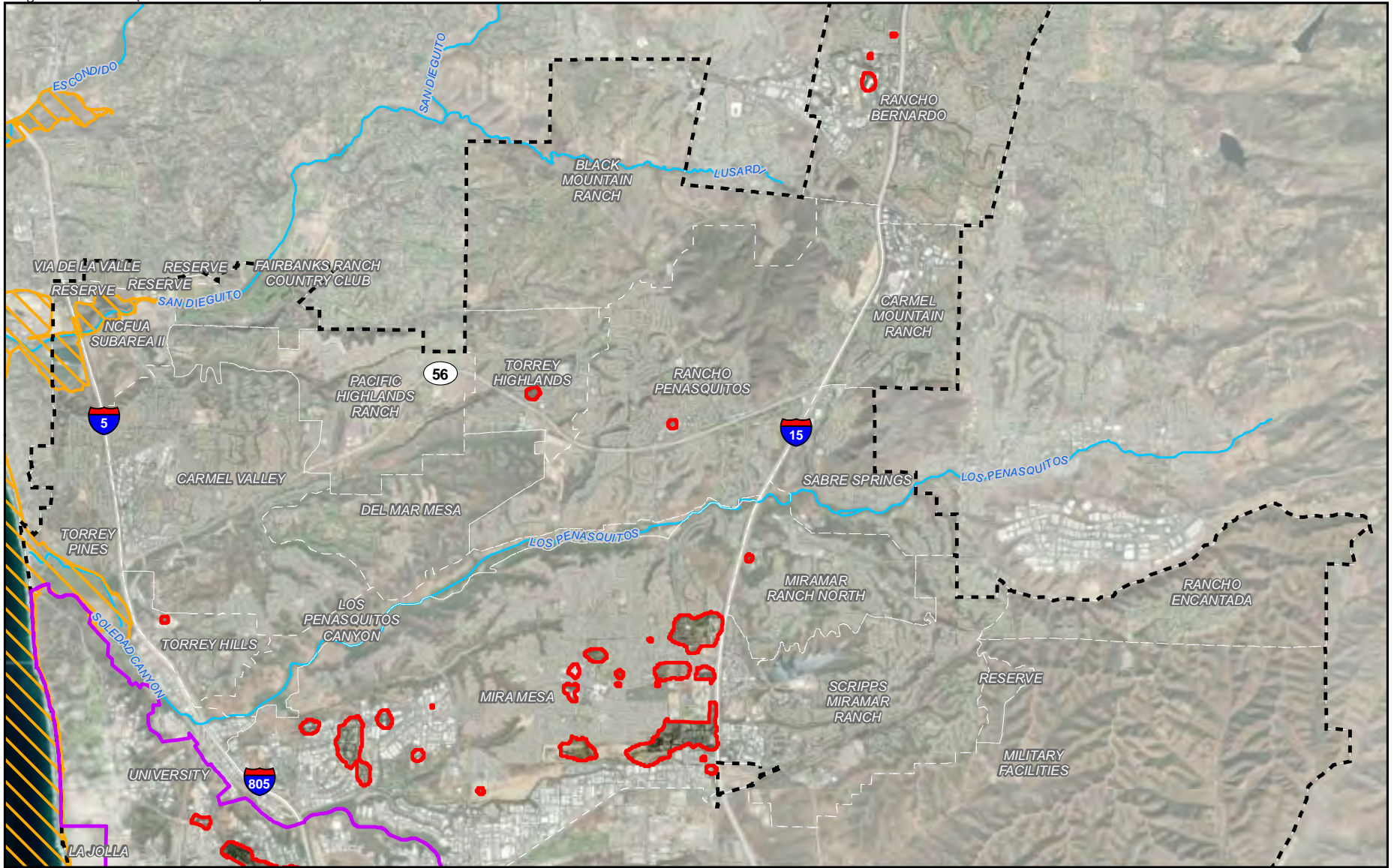






FIGURE 4.9-6c  
Tsunami Inundation Zones in Relation to  
the Project Areas - North Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Tsunami Inundation Zone

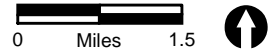
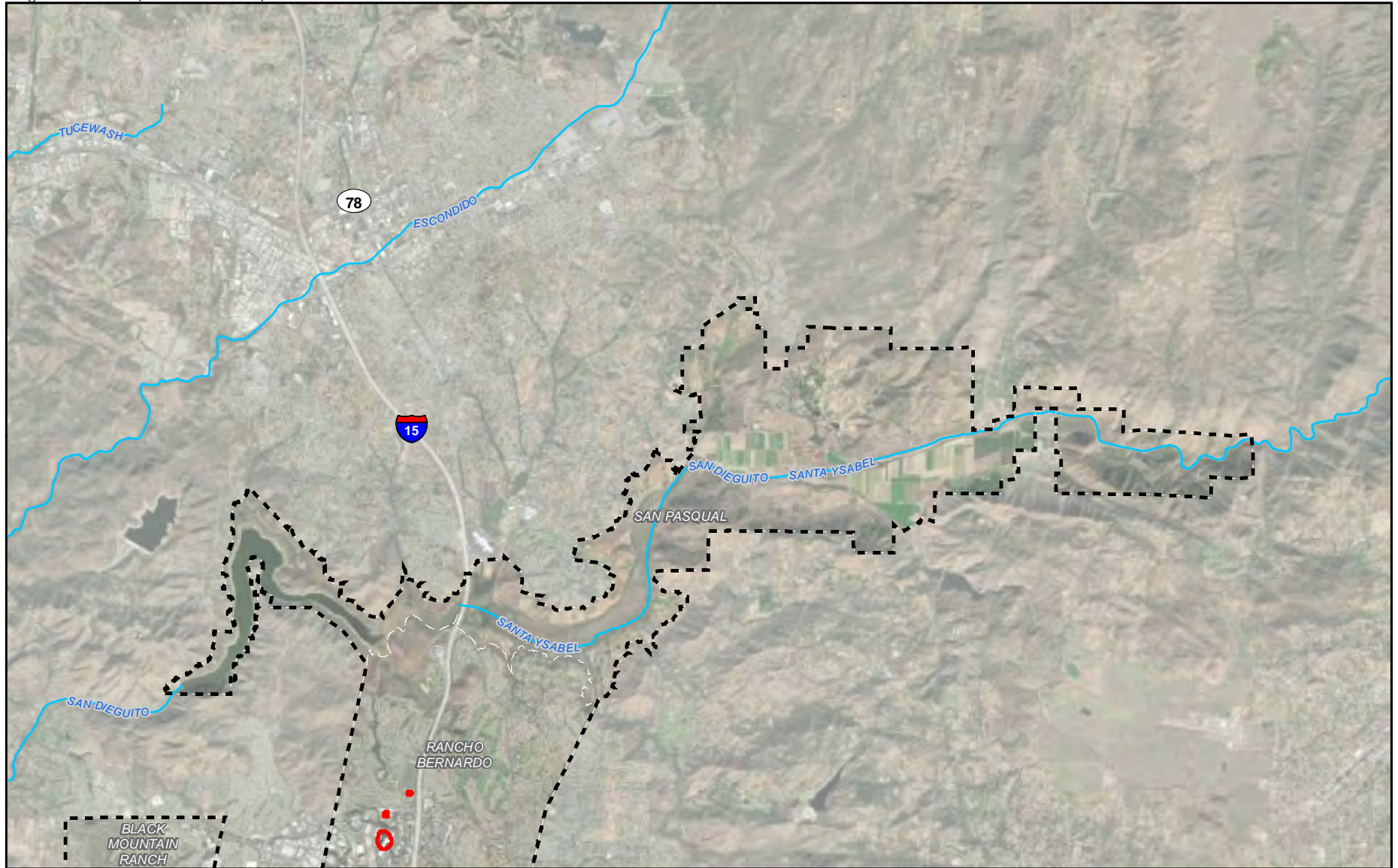




FIGURE 4.9-6d  
Tsunami Inundation Zones in Relation to  
the Project Areas - North





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

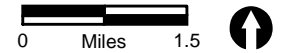


FIGURE 4.9-6e  
Tsunami Inundation Zones in Relation to  
the Project Areas - Northeast



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## 4.9.2 Regulatory Setting

### 4.9.2.1 Federal Regulations

#### a. Clean Water Act

The Clean Water Act (CWA; 33 United States Code §1251 et seq.; 1972) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The CWA established basic guidelines for regulating discharges of pollutants into the waters of the United States (U.S.) and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA.

Section 401 of the CWA requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility that may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources, and Section 404 established a permit program to regulate the discharge of dredged material into waters of the United States (U.S.).

In the state of California, the U.S. Environmental Protection Agency has authorized the permitting authority to implement the NPDES program. In general, the State Water Resources Control Board (SWRCB) issues two baseline general permits: one for industrial discharges and one for construction activities. In recognition of the regional differences in water quality and quantity, the state is divided into nine regions for the purposes of regional administration of California's water quality control program. These Regional Water Quality Control Boards (RWQCBs) are responsible for the implementation of the NPDES program. Rather than setting numeric effluent limitations for storm water and urban runoff, the CWA calls for the implementation of best management practices (BMPs). BMPs reduce or prevent the discharge of pollutants to the Maximum Extent Practicable and aim to meet the Best Available Technology Economically Achievable and Best Conventional Pollutant Control Technology standards for construction activities. Regulations and permits have been implemented at the federal, state, and local level to form a comprehensive regulatory framework to serve and protect the quality of the nation's surface water and ground water resources.

Under Section 303(d) of the CWA, states, territories, and authorized tribes are required to develop lists of impaired waters that are too polluted or otherwise degraded to meet the water quality standards set by states, territories, or authorized tribes. The law requires that these jurisdictions establish priority rankings for waters on the lists and develop total maximum daily loads (TMDLs) to identify the maximum amount of a pollutant that a waterbody can receive and still safely meet water quality standards.

As mentioned above, the CWA established the NPDES permit system that is implemented through the RWQCBs. This system regulates both point source discharges and non-point source discharges to surface waters of the U.S. The NPDES permit for Region 9, which includes the City of San Diego, is the 2013 Municipal Separate Storm Sewer System (MS4) Permit (Order No. R9-2013-0001, as amended by R9-2015-0001 and R92015-0100). This permit requires local agencies to develop water quality plans that identify project-level water quality requirements. Projects are required to identify

existing water quality conditions and potential pollutants of concern, and implement a comprehensive storm water management program to control pollutants of concern discharges to waters of the U.S.

### **b. National Flood Insurance Act**

The National Flood Insurance Act (1968) established the NFIP, which is based on the minimal requirements for floodplain management and is designed to minimize flood damage within SFHAs. FEMA administers the NFIP. SFHAs are defined as areas that would be inundated by the 100-year flood, or a flood that has a 1-percent chance of occurring within a given year (also referred to as the base flood).

### **c. National Flood Insurance Program**

The NFIP is a federal program enabling property owners in participating communities to purchase insurance protection against losses from flooding. This insurance is designed to provide an insurance alternative to disaster assistance to meet the escalating costs of repairing damage to buildings and their contents caused by floods. Participation in the NFIP is based on an agreement between local communities and the federal government that states that, if a community will adopt and enforce a floodplain management ordinance to reduce future flood risks to new construction in SFHAs, the federal government will make flood insurance available within the community as a financial protection against flood losses.

In support of the NFIP, FEMA identifies flood hazard areas throughout the U.S. and its territories by producing flood hazard boundary maps and FIRMs. Several areas of flood hazards are commonly identified on these maps, including SFHAs.

As a participant in NFIP, the City is required to institute adequate land use and development control measures for preventing and reducing property damage from flooding. In addition, the City ensures that projects within or fringing on a floodway or floodplain comply with FEMA regulations and requirements.

### **d. Executive Order 11988, Floodplain Management**

The major requirements of this executive order are to avoid support of floodplain development, to prevent uneconomic, hazardous, or incompatible use of floodplains, to protect and preserve the natural and beneficial floodplain values, and to be consistent with the standards and criteria of the NFIP. The basic tools for regulating construction in potentially hazardous floodplain areas are local zoning techniques. Proper floodplain zoning can be beneficial in the preservation of open space, retention of floodplains as groundwater recharge areas, and in directing development to less flood-prone areas.

---

## 4.9.2.2 State Regulations

### a. California Department of Fish and Wildlife – Streambed Alteration Program

The California Department of Fish and Wildlife (CDFW) regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats (e.g., southern willow scrub) associated with watercourses. CDFW jurisdictional resources are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. A Streambed Alteration Agreement is required for any project that would impact CDFW jurisdictional resources. The agreement with CDFW typically requires mitigation in the form of on-site, off-site, or in-lieu fee mitigation, or a combination of the three.

### b. State Water Resources Control Board and Regional Water Quality Control Board

In California, the SWRCB and RWQCBs administer the NPDES permitting programs and are responsible for developing waste discharge requirements. The local RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that may apply to projects include the SWRCB Construction General Permit, Industrial General Permit, and the regional MS4 Permit Order No. R9-2013-0001 (NPDES Permit No. CAS0109266), as amended by Order No. R9-2015-0001 and R9-2015-0100, and administered by the RWQCB.

### c. Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Act of 1969, updated in 2012 (California Water Code, Section 13000 et seq.), established the principal California legal and regulatory framework for water quality control. The act is embodied in the California Water Code. The California Water Code authorizes the SWRCB to implement the provisions of the federal CWA. The state of California is divided into nine regions governed by the RWQCBs. Within the project areas, the San Diego RWQCB implements and enforces the provisions of the California Water Code and the federal CWA under the oversight of the SWRCB. The Porter-Cologne Act also provides for the development and periodic review of Water Quality Control Plans (Basin Plans) that designate beneficial uses of California's major rivers and other surface waters and groundwater basins and establish water quality objectives for those waters.

## 4.9.2.3 Local Regulations

### a. Regional MS4 Permit

The San Diego RWQCB is responsible for permitting, compliance, and other activities to reduce pollutants in municipal, construction, and industrial storm water runoff. The Storm Water Management Unit of the RWQCB also provides important assistance in dispersing state grant funds

to worthy projects that support activities for the reduction and prevention of storm water pollution. As a co-permittee for the Regional MS4 permit under the NPDES and the CWA, the City must implement several storm water management programs, including those designed to control storm water and other discharges from new development and redevelopment.

The San Diego RWQCB regulates discharges from Phase I MS4s in the San Diego region under the Regional MS4 Permit. The Regional MS4 Permit covers 39 municipal, county government, and special district entities located in San Diego County, southern Orange County, and southwestern Riverside County who own and operate large MS4s which discharge storm water (wet weather) runoff and non-storm water (dry weather) runoff to surface waters throughout the San Diego region. The Regional MS4 Permit, Order No. R9-2013-0001 (NPDES Permit No. CAS0109266), was adopted on May 8, 2013, and initially covered the San Diego County co-permittees. Order No. R9-2015-0001 was adopted on February 11, 2015, amending the Regional MS4 Permit to extend coverage to the Orange County co-permittees. Finally, Order No. R9-2015-0100 was adopted on November 18, 2015, amending the Regional MS4 Permit to extend coverage to the Riverside County co-permittees. The Regional MS4 Permit expired on June 27, 2018, but remains in effect under an administrative extension until it is reissued by the San Diego Water Board.

The Regional MS4 Permit requires that all jurisdictions within the San Diego region prepare jurisdictional runoff management plans. Each of these jurisdictional plans must contain a component addressing construction activities and a component addressing existing development. The subsequent amendments expanded coverage to portions of Orange County and Riverside County within the San Diego region (Region 9) and made other modifications.

## **b. Water Quality Control Plan for the San Diego Basin**

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The basin is composed of 11 major hydrologic units, 54 hydrologic areas or units, and 147 hydrologic subareas, extending from Laguna Beach southerly to the U.S./Mexico border. The project areas are located within eight hydrologic units or watersheds including the Otay, Peñasquitos, Pueblo San Diego, San Diego, San Diego Bay, San Dieguito, Sweetwater, and Tijuana watersheds. Drainage from higher elevations flow to a number of receiving waters and, ultimately, into the Pacific Ocean. The San Diego RWQCB prepared the Basin Plan, which defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

## **c. City of San Diego Jurisdictional Runoff Management Plan**

The City's Jurisdictional Runoff Management Plan (JRMP) provides a total account of how the City plans to protect and improve the water quality of rivers, bays, and the ocean in the region in compliance with the San Diego RWQCB permit referenced above. The document describes how the City incorporates storm water BMPs into land use planning, development review and permitting, City Capital Improvement Program -project planning and design, and the execution of construction contracts. Environmentally Sensitive Areas are mapped and included in Appendix XVI of the JRMP.

## d. Water Quality Improvement Plans

The MS4 Permit requires development of Water Quality Improvement Plans (WQIPs) that guide the co-permittees' jurisdictional runoff management programs toward achieving improved water quality in MS4 discharges and receiving waters. There are ten watershed WQIPs in the San Diego region. These WQIPs include descriptions of the highest priority pollutants or conditions in a specific watershed, goals and strategies to address those pollutants or conditions, and time schedules associated with those goals and strategies. Within the project areas, WQIPs have been developed for Los Peñasquitos, Mission Bay, San Diego Bay, San Diego River, San Dieguito River, and the Tijuana River. Implementation of the WQIP furthers the CWA's objectives to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The WQIP sets forth a collaborative and adaptive planning and management process that identifies the highest priority water quality conditions within a watershed management area and implements strategies through the jurisdictional runoff management programs of the respective jurisdictions. Several WQIPs apply to the project areas including the Tijuana River WQIP, the Los ~~Peñasquitos~~Peñasquitos WQIP, and San Dieguito WQIP. WQIPs for the San Diego River and San Diego Bay watersheds are discussed below as these are the primary WQIPs affecting the project areas.

### ***Water Quality Improvement Plan for the San Diego River Watershed***

The San Diego River Watershed is located in central San Diego County. The watershed is bordered to the north by the ~~Peñasquitos~~Peñasquitos and San Dieguito River Watersheds and to the south by the Pueblo San Diego and Sweetwater River Watersheds. The San Diego River originates in the Cuyamaca Mountains near Santa Ysabel, over 6,000 feet above sea level, along the western border of the Anza Borrego Desert. The river extends over 52 miles across central San Diego County, forming a watershed with an area of approximately 434 square miles. It ultimately discharges to the Pacific Ocean at Dog Beach in Ocean Beach, a community within the City of San Diego. The San Diego River Watershed is a HU consisting of four hydrologic areas (HAs): Lower San Diego, San Vicente, El Capitan, and Boulder Creek. A portion of the project area is located within the Lower San Diego HA. The major population center in the watershed is in the Lower San Diego HA, which reflects the more urban residential land use categories located there.

The plan identifies the following goals for the City:

1. Develop a green infrastructure policy, attain City Council approval, and construct green infrastructure BMPs to improve water quality during wet and dry weather.
2. Implement runoff reduction programs that include targeted education and outreach efforts, enhanced inspections, additional rebate programs, and increased enforcement.

### ***Water Quality Improvement Plan for the San Diego Bay Watershed***

The San Diego Bay Watershed Management Area (WMA) encompasses a 444-square-mile area that extends eastward from the San Diego Bay for more than 50 miles to the Laguna Mountains. The WMA ranges in elevation from sea level at the San Diego Bay to a maximum elevation of approximately 6,000 feet above sea level at the eastern boundary. The San Diego Bay WMA contains three HUs: (1) the Pueblo San Diego (Pueblo) HU, (2) the Sweetwater River (Sweetwater) HU, and

(3) the Otay River (Otay) HU. A portion of the project area is located within the Pueblo San Diego HU. The Pueblo HU covers approximately 38,000 acres and is the most developed and most densely populated watershed in the San Diego Bay WMA. It contains three hydrologic areas (HAs): Point Loma, San Diego Mesa, and National City. The project area is located within the San Diego Mesa HA and the water from the project area drains into the San Diego Bay.

In the San Diego Mesa HA, Residential uses comprise approximately forty percent (40 percent) of the land uses followed by Transportation at approximately 29 percent, Commercial/Office Business at approximately 8 percent, and Industrial Businesses at 5 percent. Open Space/Preserves comprise approximately 6 percent of the HA. The remaining 12 percent consists of multiple uses, including Public Facilities, Schools, and Parks.

The plan identifies the following goals for the City of San Diego:

1. Develop a green infrastructure policy, attain City Council approval, and construct green infrastructure BMPs to improve water quality during wet and dry weather.
2. Implement runoff reduction programs that include targeted education and outreach efforts, enhanced inspections, additional rebate programs, and increased enforcement.

### **e. Storm Water Management and Discharge Control Ordinance**

As a co-permittee under the MS4 Permit issued by the San Diego RWQCB, the City must implement stormwater management programs, including programs designed to control stormwater discharges from development projects both during construction and on a permanent postconstruction basis. Chapter 4, Article 3, Division 3, Stormwater Management and Discharge Control, of the San Diego Municipal Code (SDMC) addresses these requirements by requiring construction measures and permanent post-construction BMPs for development projects.

### **f. Final Hydromodification Management Plan (2011)**

Since the adoption of the Final Hydromodification Management Plan in 2011 for San Diego County, RWQCB Permit Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100, was issued. Provision E.3.c. requires Priority Development Projects to implement structural and hydromodification management BMPs that conform to performance requirements that ensure post-project runoff conditions do not exceed pre-development runoff conditions by more than 10 percent.

### **g. San Diego Municipal Code**

#### ***Stormwater Runoff and Drainage Regulations***

Chapter 14, Article 2, Division 2 of the SDMC outlines the Stormwater Runoff and Drainage Regulations, which apply to all development in the City regardless of whether a development permit or other approval is required.

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## ***Floodplain Management***

The City has adopted development regulations for SFHAs in SDMC Sections 143.0145 and 143.0146. Within the floodway, the regulations set limitations on land uses, structures, and channelization or other alteration of rivers or streams, and require passage of the base flood. Permanent structures are not allowed, and any development (e.g., road crossing) must be offset by improvements or modifications to enable passage of a base flood. Within flood fringe areas, the regulations allow permanent structures and fill for permanent structures, roads, and other development if certain conditions are met.

## ***Environmentally Sensitive Lands Regulations***

The City's Environmentally Sensitive Lands (ESL) Regulations (SDMC Chapter 14, Article 3, Division 1) help protect, preserve, and restore lands containing steep hillsides, sensitive biological resources, coastal beaches, sensitive coastal bluffs, or SFHAs. The intent of the ESL Regulations is to ensure that development occurs in a manner that protects the overall quality of the resources, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities.

## ***City of San Diego Drainage Design Manual***

Drainage design policies and procedures are provided in the City's Drainage Design Manual updated in January 2017 (which is incorporated in the Land Development Manual as Appendix B). The Drainage Design Manual provides policies and procedures to attain standardization of drainage design throughout the City. The manual also provides design standards and procedures for stormwater conveyance and hydrology analysis for flood management and water quality facilities.

## ***Stormwater Standards Manual***

The City's Stormwater Standards Manual 2018 provides information to project applicants on how to comply with the permanent and construction stormwater quality requirements in the City. The Stormwater Standards Manual is contained in Appendix O of the City's Land Development Manual and is organized in three key parts:

**Part 1:** BMP Design Manual for Permanent Site Design, Stormwater Treatment and Hydromodification Management

**Part 2:** Construction BMP Standards

**Part 3:** Offsite Stormwater Alternative Compliance Program for Water Quality and Hydromodification Control

Part 1 of the Stormwater Standards Manual, the BMP Design Manual, addresses and provides guidance for complying with on-site post-construction stormwater requirements for Standard Projects and PDPs, and provides procedures for planning, preliminary design, selection, and design of permanent stormwater BMPs based on the performance standards presented in the MS4 Permit.



Part 2 of the Stormwater Standards Manual addresses stormwater impacts and required controls associated with construction activities in the City. The purpose of these standards is to provide guidance to prevent construction activities from adversely impacting downstream and on-site resources through appropriate planning, installation, and maintenance of BMPs. The construction BMP standards provide guidance on the appropriate BMPs to prevent discharges of pollutants associated with construction activity.

Part 3 of the Stormwater Standards Manual addresses the Offsite Stormwater Alternative Compliance Program (Offsite Alternative Compliance Program) developed by the City to allow mitigation of ~~Priority Development Project~~ PDP stormwater impacts through implementation of off-site structural BMPs. The program allows for offsite control of water quality and hydromodification impacts, provides design options and flexibility in the case of site infeasibility, and provides the potential for more effective regional stormwater control solutions to improve watershed-scale water quality.

## h. City of San Diego General Plan

Multiple elements of ~~City of San Diego's~~ General Plan address hydrology and flood risk. The General Plan provides policies for protecting communities from unreasonable risk of flood. Applicable General Plan policies, including new and/or updated policy language applicable to hydrology and flooding include the following.

The **Public Facilities, Services, and Safety Element** presents goals and policies related to stormwater infrastructure, water quality, and pollution prevention. Overall goals include the protection of beneficial water resources through pollution prevention and interception efforts and implementation of a storm water conveyance system that effectively reduces pollutants in urban runoff and storm water to the maximum extent practicable. Applicable policies address ensuring storm water conveyance systems, structures, and maintenance practices are consistent with the federal CWA and the San Diego RWQCB NPDES Permit standards; installing infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies; meeting and exceeding regulatory mandates to protect water quality in a cost-effective manner monitored through performance measures; fostering a comprehensive approach to storm water infrastructure improvements; identifying and implementing BMPs for projects that repair, replace, extend or otherwise affect the storm water conveyance system; and identifying partnerships and collaborative efforts to sponsor and coordinate pollution prevention BMPs that benefit storm water infrastructure maintenance and improvements (General Plan Policies PF-G.1 through 6.).

The **Conservation Element** presents goals and policies related to floodplains, erosion control, and managing runoff and sedimentation during and after development. Applicable goals include preservation and long-term management of the natural landforms and open spaces that help make San Diego complete; protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands; and preservation of natural attributes of both the floodplain and floodway without endangering life and property.

Associated policies address applying appropriate zoning and ESL regulations to limit development of floodplains and sensitive biological areas including wetlands, steep hillsides, canyons, and coastal lands; managing watersheds and regulating floodplains to reduce disruption of natural systems; restoring water infiltration, flood and erosion control, biodiversity and sand replenishment benefits; limiting grading and alterations of steep hillsides, cliffs, and shoreline to prevent increased erosion and landform impacts; and limiting and controlling runoff, sedimentation, and erosion both during and after construction activity.

Urban Runoff Management Policies include applying water quality protection measures to land development projects early in the project design process to minimize the quantity of runoff generated on-site, the disruption of natural water flows and the contamination of stormwater runoff; increasing on-site infiltration, and preserving, restoring or incorporating natural drainage systems into site design; directing concentrated drainage flows away from the Multi-Habitat Planning Area (MHPA) and open space areas; reducing the amount of impervious surfaces through the selection of materials, site planning, and street design where possible; increasing permeable areas for new trees and restoring spaces that have been paved, focusing in areas with the greatest needs; increasing the use of plants in drainage design; maintaining landscape design standards that minimize the use of pesticides and herbicides; avoiding development of areas particularly susceptible to erosion and sediment loss (e.g., steep slopes) and, where impacts are unavoidable, enforcing regulations that minimize their impacts; enforcing maintenance requirements in development permit conditions; and increasing the use of green infrastructure, both at watershed scale and site-specific location (General Plan Policies CE-E.2.).

Further, the Conservation Element includes policies requiring contractors to comply with accepted storm water pollution prevention planning practices for all projects; minimizing the amount of graded land surface exposed to erosion and enforcing erosion control ordinances; and continuing routine inspection practices to check for proper erosion control methods and housekeeping practices during construction (General Plan Conservation Element policy CE-E.3); and policies for managing floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety (General Plan Policies Conservation Element policy CE-E.7).

### **i. City of San Diego Jurisdictional Runoff Management Plan**

The JRMP is the City of San Diego's approach to improving water quality in its rivers, bays, lakes, and ocean through reducing discharges of pollutants to the MS4 (hereafter, "storm drain system"). As the operator of a storm drain system, the City is subject to an NPDES Municipal Permit issued by the RWQCB. The permit requires the City to reduce pollutants in discharges from its storm drain system to water bodies. The City's storm drain system conveys most runoff from rain, irrigation runoff, natural groundwater seepage, and other sources of water-to-water bodies without first being directed to a treatment plant. To reduce pollutants in these storm drain system discharges to water bodies, the City implements or requires its residents and land owners to implement a variety of measures commonly referred to as Minimum BMPs for residential, industrial, commercial, and municipal sites/sources.

The most recent permit, RWQCB Order No. R9-2013-0001, as amended by Order No. R9- 2015-0001 and Order No. R9-2015-0100 (Municipal Permit or Permit), requires the City to prepare both jurisdictional and watershed scale plans that detail how they will comply with the new requirements. The watershed plans, known as ~~Water Quality Improvement Plans (WQIP)~~ each focus on a particular watershed. The Stormwater Department has led the City's efforts to update this JRMP and six WQIPs.

## **j. City of San Diego Stormwater Standards – BMP Design Manual**

To mitigate the potential for pollution from urban runoff, local, state, and federal agencies have instituted regulations requiring development planning and BMPs for construction and post-construction phases of a proposed project. These standards require control of stormwater-related pollution from development and redevelopment projects prior to discharge to receiving waters. These regulations are codified in NPDES permits administered by the State of California. Stormwater discharges associated with the permanent condition of development and redevelopment that are conveyed to and from an MS4 are regulated locally by the San Diego Regional MS4 Permit (order R9-2013-0001), reissued by the California RWQCB in May 2013. The MS4 Permit was amended in February 2015 by Order R9-2015-0001, and again in November 2015 by Order R9- 2015-0100. Stormwater discharges associated with the construction phase of development and redevelopment projects one acre or greater are primarily regulated under the Construction General Permit (Order 2009- 0009-DWQ, as amended by 2010-0014-DWQ and 3023-006- DWQ), promulgated by the ~~State Water Resources Control Board (SWRCB)~~. Additionally, construction-phase discharges are regulated by the Regional MS4 Permit.

## **k. Administrative Procedures for Floodplain Management and Compliance**

The City adopted standard operating procedures (SOP) in 2023 which documents the minimum actions required for the intake, review, acceptance and recordkeeping of all new and substantially improved projects, as well as all repairs due to substantial damage when proposed in a ~~Special Flood Hazard Area (SFHA)~~ and/or near a levee. As detailed in the SOP, the City's Stormwater and Development Services Departments are the two City departments that are primarily responsible for intake, review, acceptance, and recordkeeping. The SOP is intended as a comprehensive guide to the processing of projects that affect floodplains; however, it does not establish legally enforceable responsibilities beyond what is required by the terms of the applicable statutes, regulations or binding judicial precedent (City of San Diego 2023).

## **l. Municipal Waterways Maintenance Plan**

Under City Charter Section 26.1 and Council Policy 800-04, the City is responsible for maintaining adequate drainage facilities to remove stormwater runoff in an efficient, economic, and environmentally and aesthetically acceptable manner for the protection of property and life. The City generally accepts responsibility for maintenance of public drainage facilities that are designed and constructed to City standards and located within a public street or drainage easement dedicated to the City. The City's stormwater conveyance system serves to convey stormwater flows to protect the life and property of its citizens from potential flooding within the six WMAs and seven HUs within the City. The Municipal Waterways Maintenance Plan (~~MWMP~~) provides the regulatory

guidance and parameters for the City's Stormwater Department to maintain and repair existing storm water facilities necessary to reduce and manage flood risk.

### 4.9.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to hydrology are based on applicable criteria in the California Environmental Quality Act Guidelines Appendix G and the City's California Environmental Quality Act Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?
- 2) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:
  - Result in substantial erosion or siltation on- or off-site?
  - Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?
  - Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?
  - Impede or redirect flood flows?
- 3) In flood hazard, tsunami, or seiche zones, would the project, risk release of pollutants due to project inundation?

### 4.9.4 Impact Analysis

#### Issue 1 Groundwater

*Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

Based on the Water Quality Control Plan for the San Diego Basin (City of San Diego 2021), most of the groundwater in the region has been extensively developed, and the availability of potential future uses of groundwater resources is limited. Further development of groundwater resources would likely necessitate groundwater recharge programs to maintain adequate groundwater table elevations.

Future development under the Blueprint SD Initiative, the University CPU, and Hillcrest FPA could decrease groundwater supplies or interfere with groundwater recharge if it proposes to use groundwater or if an increase in impervious surfaces would impede groundwater infiltration and recharge. Groundwater use in the City is limited due to the availability of imported water. However, development commonly increases impervious surfaces, particularly on undeveloped sites. While a majority of the development anticipated in the project areas would consist of redevelopment of existing developed sites, some development of vacant land could occur. Generally, redevelopment would increase the capacity for groundwater recharge due to most existing development being constructed prior to current water quality standards being in place that require some level of site infiltration, where feasible.

As new development or redevelopment occurs within the project areas, compliance with stormwater standards would ensure site design BMPs are implemented that support infiltration, where feasible, although some sites have conditions that do not allow for infiltration.

Current stormwater regulations would ensure infiltration of stormwater runoff and protection of water quality, which would also protect the quality of groundwater resources and support infiltration where appropriate. In addition, future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU is not anticipated to include or require the extraction of groundwater and would, therefore, not deplete groundwater supplies. Thus, impacts would be less than significant.

## Issue 2 Drainage

*Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

- a) Result in substantial erosion or siltation on- or off-site?*
- b) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?*
- c) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?*
- d) Impede or redirect flood flows?*

### a. Erosion & Siltation

Future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would have the potential to result in increased erosion or siltation both on-site and off-site. The alteration of drainage patterns and increase in runoff associated with the addition of impervious surfaces and structures can increase the frequency and amount of flooding and potentially result in accelerating the rate of erosion and siltation throughout the watershed. All development projects are required to comply with the City's Stormwater Standards Manual, Drainage Design Manual, and JRMP. Generally, smaller infill projects would not

substantially increase impervious surface area and implementation of onsite stormwater construction BMPs in compliance with the City's JRMP would ~~suffice~~ minimize impacts. For larger projects involving substantial changes in drainage patterns, impervious surfaces, and resulting surface runoff, additional studies are required to determine compliance with the City's Stormwater Standards Manual as further detailed in Section 4.9.4, Issue 1.

A hydrology or drainage study would determine the pre- and post-construction peak runoff flow rates and velocities exiting the project site, as well as the potential for siltation and erosion for sites discharging to natural waterbodies. Erosion and siltation resulting from increased runoff can be generally avoided or reduced through site design, source control and structural pollutant control BMPs, and hydromodification management requirements, as required for certain types of projects in compliance with the City Stormwater Standards Manual and Drainage Design Manual. Future projects would be required to comply with the extensive regulatory framework in place that ensures development is designed to avoid drainage impacts due to erosion and siltation;- therefore, impacts would be less than significant.

## **b. Surface Run-off**

Future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would have the potential to increase surface runoff and change stream-flow velocities or quantities. The project areas are mostly developed with extensive impervious surfaces associated with existing buildings, roadways, and parking areas. Floodways are primarily limited to canyon areas and the San Diego River.

There may be significant impacts on downstream properties if drainage patterns are changed. Impacts would be determined on a case-by-case basis and would be affected by streambed characteristics. A project directly affecting a stream or river would be required to prepare a hydrology or drainage study for the hydraulic analyses.

Most rainfall becomes runoff because there are minimal opportunities for infiltration in developed areas. This results in high peak flow rates for short durations with the potential for flooding from runoff. Future development anticipated to be implemented under the project may result in an increase in impervious surfaces (outside of the City's MHPA) and has the potential to change runoff characteristics, including the volume of runoff, rate of runoff, and drainage patterns, which could result in flooding.

Future projects implemented under the project would be required to comply with the City's Stormwater Standards Manual. These regulations ensure the City's compliance with the NPDES permit requirements and San Diego Regional MS4 permit issued by the San Diego RWQCB. The Stormwater Standards Manual contains requirements that dictate design elements in development and redevelopment projects. Requirements pertaining to stormwater runoff include the implementation of on-site Low Impact Development (LID) BMPs, such as detention/retention basins, permeable pavement, cisterns, and rain barrels, to retain stormwater on-site and limit runoff. The Stormwater Standards Manual also includes the applicable requirements of the Final Hydromodification Management Plan prepared by the County of San Diego and implemented by the MS4 Permit Co-permittees of the San Diego Region. These requirements include design elements to

limit stormwater runoff discharge rates and durations, specifically in locations where downstream channels are susceptible to erosion.

All development in the City is subject to the drainage regulations contained in the SDMC Chapter 14, Article 2, Division 2, Stormwater Runoff and Drainage Regulations and the JRMP, which require that all development be conducted to prevent erosion and stop sediment and pollutants from leaving the property to the maximum extent practicable. Since future development under the proposed project would be required to adhere to applicable drainage regulations, development would not result in alterations to existing drainage patterns in a manner that would result in flooding on- or off-site. In addition, the majority of the City's open space areas, including canyons and natural slopes, are located within the MHPA, the City's planned habitat preserve within its Multiple Species Conservation Program Subarea Plan (City of San Diego 1997). Development is limited within the MHPA to ensure the long-term viability and recovery of protected or special status species. Future development in accordance with the Blueprint SD Initiative, Hillcrest FPA, and University CPU would be focused in previously disturbed and developed urban areas. Further, the Blueprint SD Initiative, University CPU and Hillcrest FPA include policies that support open space preservation, drainage management, and stormwater infrastructure improvements. These policies also support urban greening, consistent with the City's Climate Action Plan CAP. Such design elements would help create "green streets" that incorporate vegetation, trees, soil, and engineered systems (such as permeable pavement, bioswales, etc.) to slow, filter, and cleanse stormwater runoff from impervious surfaces (e.g. concrete and asphalt). As such, implementation of the ~~proposed~~ project would not result in flooding due to an increase in impervious surfaces, changes in absorption rates, drainage patterns, or the rate of surface runoff; therefore, impacts would be less than significant.

### **c. Stormwater Drainage Systems**

Future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would have the potential to exceed the capacity of existing or planned stormwater drainage facilities. Stormwater drainage facilities are designed to prevent flooding by collecting stormwater runoff and directing flows to the nearest downstream waterbody and/or away from urban development. If drainage facilities are not adequately designed, built, or properly maintained, the capacity of the existing facilities can be exceeded, resulting in flooding and increased sources of polluted runoff. The capacity of a drainage structure can typically be adequately determined by a hydrology and drainage study. Required compliance with the City's Stormwater Standards Manual and Drainage Design Manual, which are elements of the Land Development Manual, would ensure that future development would not contribute runoff that exceeds the capacity of stormwater drainage systems and that drainage from an existing site is treated to remove pollutants. The requirements for onsite LID BMPs, such as stormwater detention/retention BMPs set forth in the City's Stormwater Standards Manual, minimize impervious areas and, as a result, simultaneously reduce project runoff and the potential transport of pollutants to the City's stormwater drainage systems. Furthermore, the City's Stormwater Department actively maintains and repairs the City's existing stormwater infrastructure to ensure adequate stormwater conveyance through implementation of the ~~MWMP~~ Municipal Waterways Maintenance Plan. Therefore, impacts would be less than significant.



## d. Flood Flows

Future development under the project would be required to adhere to applicable regulations regarding flood protection; thus, it is not anticipated that the development or redevelopment of properties that would impede or redirect flood flows. Development within floodways must be consistent with the uses allowed by the SDMC (Table 131-02B). Development in floodways would also need to be offset by improvements or modifications to enable the passage of a base flood, in accordance with the FEMA standards and regulations provided in SDMC Section 143.0146, and demonstrate compliance with the City's Flood Mitigation Plan and development regulations for SFHAs (SDMC Section 143.0145 and 143.0146).

All development occurring within the project areas would be subject to the drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual, ESL Regulations protecting floodplains, FEMA standards, and the City's Stormwater Standards Manual. Impacts related to changes in drainage patterns affecting flood flows would be avoided through site specific evaluation of local hydrology and preparation of design plans approved by the City Engineer. Hydrological and drainage studies must analyze erosional characteristics, flow velocities, volume, sediment transport, and maintenance of hydrology, which would ensure flood flows would not be redirected or impeded as a result of development. With implementation of the City's SDMC, Drainage Design Manual, ESL Regulations protecting floodplains, FEMA standards, and the City's Stormwater Standards Manual, impacts related to drainage changes affecting flood flows associated with implementation of Blueprint SD, the University CPU, and Hillcrest FPA would be less than significant.

## Issue 3 Inundation

*Would the project, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?*

Approximately 25,055 linear feet of the San Diego River runs through the Climate Smart Village Areas. Floodways and floodplains in relation to the project areas are depicted on Figures 4.9-2a through d and 4.9-3. As shown, the 100-year and 500-year floodways are primarily limited to canyon areas and the San Diego River. Portions of the mapped 100-year floodplain are also designated SFHAs, which are high risk areas defined as any land that would be inundated by the 100-year flood (the flood having a 1 percent chance of occurring in any given year). The Hillcrest FPA area is not located in a 100-year floodplain, 500-year floodplain, or 100-year floodway, as shown in Figure 4.9-2b. The University CPU area contains 100-year floodway, 100-year floodplains, and 500-year floodplains, which are areas subject to major flooding (see Figure 4.9-3).

Within the City, most of the floodplain areas are located within the MHPA, which would be retained as Open Space with the project. However, future development within the Climate Smart Village Areas may be affected by flood zones. Future development under the project could potentially encroach into mapped floodplains, including SFHAs. However, future development would be subject to applicable City SDMC requirements in the ESL regulations related to SFHA and federal requirements, including City requirements for protection from flooding, including elevating the lowest floor of a structure at least 2 feet above the base flood elevation (SDMC 143.0146(b)(2)). Fully

enclosed areas below the lowest floor that are subject to flooding are required to comply with FEMA requirements for flood proofing. Pursuant to SDMC Sections 143.0145 and 143.0146, future development projects within SFHAs must also undergo a project-level analysis to determine the effects of the project to base flood elevations and ensure that no flooding, erosion, or sedimentation impacts occur on or offsite.

As described in Section 4.9.1, the project areas are subject to inundation from floods, tsunami and dam inundation. Approximately 10,454.8 acres of the Climate Smart Village Areas are located within dam inundation areas and approximately 21.5 acres of the University CPU area are located in dam inundation areas. The Hillcrest FPA area is not located in a dam inundation area. The "inundation zone" is the area downstream of the dam that would be flooded in the event of a failure or uncontrolled release of water. Dam failure is considered a low-probability event because dams are inspected annually by the California Division of Safety of Dams to ensure they are in good operating condition. With continued evaluation of dam stability, continued compliance with State regulations would ensure risk associated with flooding due to dam failure is considered minimal, and therefore, impacts associated with risk of pollutant release in the event of dam failure would be less than significant. Additionally, seiches pose a minimal threat because there are no large, confined bodies of water in the City.

The project would result in additional multi-family and mixed-use development capacity within the project areas. Residential and commercial land uses anticipated by the project would generally be associated with less potential for release of pollutants than other uses such as industrial land uses. However, in the event of inundation due to flooding, pollutants could be released.

While compliance with SDMC and FEMA regulations pertaining to flood zones would generally be adequate to ensure risk of release of pollutants due to project inundation could be avoided; however, a portion of the Climate Smart Village Areas are located within the Mission Valley Community Plan area which is designated Zone X with a PAL note. While Zone X is not typically subject to regulations for the flood fringe, the Mission Valley Community Plan contains policies recommending that development located behind the PAL consider designs to meet the City's regulations regarding buildings within SFHA Zone AE. Designing projects to meet the flood protection requirements of Zone AE is encouraged as it would ensure protection up to the 100-year flood in the event levees were removed on the next FIRM revision. Consistent with the findings in the Mission Valley CPU FEIR, impacts related to development behind the PAL area are considered significant due to the level of uncertainty regarding this potential flooding impact. Within the University CPU area, while there are no PALs, there are areas subject to existing flooding; therefore, at a program level of review impacts related to flooding in University CPU area are considered significant. Impacts related to flooding in the Hillcrest FPA area would be less than significant due to no flood hazard zones being present.

Impacts related to pollutant release resulting from inundation within the project areas are anticipated to be less than significant for most areas due to required compliance with applicable SDMC and FEMA regulations that require protection from flooding. Future development would be required to conform to the City's Flood Mitigation Plan and the SDMC for Development Regulations for SFHAs (Section 143.0145 and 143.0146) which would ensure flood hazards and the corresponding risk of release of pollutants due to inundation are minimized. However, due to

portions of the Climate Smart Village Areas being located within the Mission Valley Community Plan area which is designated Zone X with a PAL note and portions of University being subject to flooding, impacts related to the potential for pollutant release due to inundation within the Blueprint SD Initiative project areas ~~Climate Smart Village Areas~~ and University CPU areas ~~area~~ are considered significant. Impacts related to the potential for pollutant release due to inundation would be less than significant for the Hillcrest FPA area.

## Cumulative Impacts

Future development resulting from implementation of the proposed project could contribute to cumulative impacts related to hydrology, including downstream flooding, flood hazards from tsunami and mudflow, and erosion and sedimentation. However, all future development within the project areas would be required to comply with all NPDES permit requirements, and the City's Stormwater Standards Manual and Drainage Design Manual. Cumulative downstream flooding impacts would be avoided through regulatory compliance, including the City's ESL Regulations and stormwater regulations contained in the SDMC. While development downstream of the PAL in Mission Valley would be a significant impact, it is a localized impact and would not contribute to a cumulative flooding impact. Thus, cumulative impacts would be less than significant.

## 4.9.5 Significance of Impacts

### 4.9.5.1 Groundwater

New development occurring within the project areas would be required to implement onsite LID BMPs into the design of future projects within the project areas to address the potential for transport of pollutants of concern through either detention/retention or infiltration, consistent with the requirements of the MS4 Permit issued by the San Diego RWQCB, and the City's Stormwater Standards Manual and Drainage Design Manual. Implementation of LID BMP design elements would reduce the amount of pollutants transported from the project areas to receiving waters. Thus, through compliance with the existing regulatory framework addressing protection of water quality, impacts would be less than significant.

### 4.9.5.2 Drainage

Future projects would be required to comply with the City's drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual, ESL Regulations protecting floodplains, FEMA standards, and the City's Stormwater Standards Manual which would ensure development is designed to avoid drainage impacts due to erosion and siltation, surface runoff, stormwater drainage systems, and flood flows; therefore, impacts would be less than significant.

### 4.9.5.3 Inundation

Impacts related to pollutant release resulting from inundation within the project areas are anticipated to be less than significant for most areas due to required compliance with applicable

SDMC and FEMA regulations that require protection from flooding. Future development would be required to conform to the City's Flood Mitigation Plan and the SDMC for Development Regulations for SFHAs (Section 143.0145 and 143.0146) which would ensure flood hazards and the corresponding risk of release of pollutants due to inundation are minimized. However, due to portions of the Climate Smart Village Areas being located within the Mission Valley Community Plan area which is designated Zone X with a PAL note, impacts related to development behind the PAL area are considered significant due to the level of uncertainty regarding this potential flooding impact. Within the University CPU area, while there are no PALs, there are areas subject to existing flooding; therefore, at a program level of review impacts related to flooding in University CPU and Blueprint SD Initiative project areas are considered significant. Impacts related to flooding in the Hillcrest FPA area would be less than significant due to no flood hazard zones being present.

### 4.9.6 Mitigation, Monitoring and Reporting

As detailed in the preceding analysis, all impacts would be less than significant except impacts related to inundation (Issue 3) within the Climate Smart Village Areas and within the University CPU area would be considered a significant impact due to existing flood risks being present that could affect pollutant release. As future development occurs, project level evaluation would occur to ensure development does not exacerbate flood conditions. Implementation of the City's drainage and floodplain regulations in the SDMC, the City's Drainage Design Manual, ESL Regulations protecting floodplains, FEMA standards, would be sufficient to reduce impacts to less than significant for most areas of the City. However, due to the level of uncertainty regarding the potential flooding impact associated with potential future development located behind the PAL in Mission Valley, in addition to other areas of flooding concern, impacts would be significant. At a program level of review, no feasible mitigation measures are available.

## 4.10 Land Use and Planning

This section analyzes the potential for significant impacts related to land use to occur due to implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes the adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update ~~(CPU)~~ (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

Issues addressed in this section include potential conflicts with the environmental goals of the City’s General Plan, Local Coastal Program (LCP), and Environmentally Sensitive Lands (ESL) Regulations; the San Diego Municipal Code (SDMC); the San Diego Association of Governments’ (SANDAG’s) San Diego Forward: The Regional Plan (Regional Plan); and the Airport Land Use Compatibility Plans (ALUCPs) for San Diego International Airport (SDIA), Brown Field, Marine Corps Air Station (MCAS) Miramar, Naval Outlying Landing Field (NOLF) Imperial Beach, and Montgomery Field. Consistency with the City’s adopted Multiple Species Conservation Program (MSCP) Subarea Plan (SAP), Vernal Pool Habitat Conservation Plan (VPHCP), the City’s 2022 Climate Action Plan (CAP), and the Historical Resources Regulations (HRR) are also addressed in this section.

### 4.10.1 Existing Conditions

Existing land use conditions for each of the project components are described below.

#### 4.10.1.1 Land Use

##### a. Blueprint SD Initiative

As described in Chapter 3.0, Project Description, the Blueprint SD Initiative anticipates land use changes throughout the City, with a focus on land use change within Climate Smart Village Areas, which include areas with a village propensity value of 7 through 14 (see Figure 3-1). These areas are defined by an existing or future propensity to support alternative transportation modes including walking/rolling, bicycling, and transit. These are generally located in developed, urban lands with proximity to major transit corridors. The Climate Smart Village Areas include approximately 2,859 acres within the Coastal Zone. The Blueprint SD Initiative’s policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, impacts associated with future development are more likely to be concentrated in these areas.

## **b. Hillcrest Focused Plan Amendment**

The Hillcrest FPA area is located at the center of the Uptown Community Plan area. Existing land use in Hillcrest includes residential, commercial, schools, open space, and public facilities/institutions. Hillcrest is characterized by a commercial core, older mixed-use housing, and a large institutional employment center. Residential-only uses account for approximately 79 acres or approximately 21 percent of the land within the Hillcrest FPA area, with multi-family housing comprising approximately 29 percent and single-family at approximately 10 percent. Residential uses are generally located along the perimeter of the Hillcrest FPA area, away from major commercial streets like University, Washington, and Fifth Avenue. Three primarily residential neighborhoods exist within the Hillcrest FPA area, including a largely multi-family residential area between the University of California, San Diego (UCSD) Medical Center and Scripps Mercy Hospital. A mixture of single-family and multi-family units are located east of State Route (SR) 163 along Essex Street and the Cleveland and Normal Street area. A mixture of single-family, multi-family, and commercial uses are located in the core of the Hillcrest FPA area west of SR-163 and south of Washington Street. Mixed-use developments are concentrated along major commercial corridors. Commercial land uses, including office, retail, and visitor uses, account for approximately 112 acres or approximately 29 percent of the land in the Hillcrest FPA area. Primary east-west commercial corridors include Washington Street and University Avenue. Primary north-south commercial corridors include Fourth, Fifth, and Sixth avenues. Public and community facilities, including education and institutional uses, account for approximately 52 acres or approximately 29 percent of the land in the Hillcrest FPA area. The two major hospitals, UCSD Medical Center and Scripps Mercy Hospital, account for a significant portion of this acreage. Other land uses include parking, transportation and utilities, and vacant parcels (City of San Diego 2020).

## **c. University Community Plan Update**

The University Community Plan, last amended in 2019, provides the policy framework that guides the future physical development of the community. The Community Plan is a component of the General Plan, and both provide land use planning direction for focused planning and implementation efforts. The update as part of this project plans more opportunities for homes, jobs and mixed-use development connected to UCSD, retail and employment centers, hospitals, health care facilities, residential areas, public spaces, and bus rapid and light rail stations. The University CPU encourages a variety of uses and building typologies to encourage the economic development of University into a robust, transit-oriented neighborhood. Detailed in the Urban Design chapter of the CPU are the six village areas, with strategies to concentrate density near transit stops while supporting an active public realm. Improved infrastructure and transit connections between these villages lays the groundwork for low-emissions trips while mitigating car traffic. Redevelopment within these focus areas will provide key community amenities, increase the local supply of housing, and accommodate job and employment growth in healthcare and tech-sector industries.

The University CPU area includes approximately 2,596 acres within the Coastal Zone and those areas are subject to the California Coastal Act. The Coastal Act requires all jurisdictions within the Coastal Zone to prepare a LCP, which includes issue identification, a land use plan, and implementation (zoning) Ordinances. Actions associated with this CPU would be integrated into the LCP upon Coastal

Commission approval. The Land Use Framework also includes additional regulations associated with the Airport Land Use Compatibility Overlay Zone for MCAS Miramar.

### ***Nexus Technology Centre Specific Plan***

The Nexus Technology Centre Specific Plan area is located within the University CPU area, on the south side of Eastgate Mall between Interstate (I) 5 and I-805 (Figure 4.10-1). As part of this project, the Nexus Technology Centre Specific Plan would be rescinded and would be replaced with the land use designations proposed by the CPU. Adjacent uses are generally described as office, hotel, and retail to the south with residential to the northwest across Eastgate Mall and industrial/scientific research to the west and northeast.

The plan incorporates industrial and scientific research uses in a campus environment. The buildings are low scale, similar in style, and symmetrically arranged around a formal plaza. The area represents a transition between the dense high-rise office towers, hotel, and regional commercial uses to the south and southeast, and the lower scale residential, industrial, and scientific research uses to the north and northeast.








### ***Costa Verde Specific Plan***

An amendment to the Costa Verde Specific Plan was approved on November 10, 2020. The revised Specific Plan envisioned the reconfiguration, revitalization, and expansion of the existing Costa Verde Center to create a local, walkable hub that provides neighborhood services, retail shops, restaurants, office/research and development uses, a hotel, and community gathering spaces. The existing approximately 178,000 square feet) of commercial/retail uses would be retained and new uses would be added including approximately 360,000 square feet of research and development and 40,000 square feet of office uses. A one-acre portion of the Specific Plan was designated Visitor Commercial to reintroduce a 200-room hotel, up to 10 stories in height and approximately 125,000 square feet. The maximum building heights would be 45 feet for commercial/retail structures, and 135 feet for commercial/office/research and development and hotel uses.

The Costa Verde Specific Plan area is bounded on the north and east by existing arterial roads (La Jolla Village and Genesee); on the south by Nobel Drive; and on the west by Regents Road (see Figure 4.10-1). The Specific Plan area consists of approximately 58 acres (53 net buildable acres after dedication of major perimeter roads), bounded by a mixture of existing residential, commercial and office land uses.





- |   |                           |   |                         |
|---|---------------------------|---|-------------------------|
|  | Nexus Specific Plan       |  | Freeway                 |
|  | Costa Verde Specific Plan |  | Railroad                |
|  | UCSD Campus               |  | Community Plan Boundary |
|  | City Parks and Open Space |   |                         |

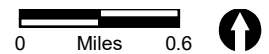


FIGURE 4.10-1

University Community Plan Update Area - Specific and Master Plans

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## ***University of California, San Diego La Jolla Campus 2018 Long Range Development Plan***

The UCSD La Jolla Campus 2018 Long-Range Development Plan (LRDP) is a general land use plan that guides the physical development of the campus (see Figure 4.10-1). The LRDP outlines the possibilities for growth in a way that acknowledges the campus's historic foundations, natural beauty and unique character while ensuring that UCSD can continue to advance its mission: To transform California and a diverse global society by educating, by generating and disseminating knowledge and creative works, and by engaging in public service. The LRDP aligns with the goals of UCSD's Strategic Plan while adhering to urban planning principles established by previous LRDPs and the University's 1989 Master Plan study. The UC Regents approved the LRDP in November 2018. The 2018 LRDP is the sixth comprehensive long-range plan for the physical development of the campus and will guide development through 2035. UCSD produced previous plans in 1963, 1966, 1981, 1989, and 2004.

### **4.10.1.2 Airports**

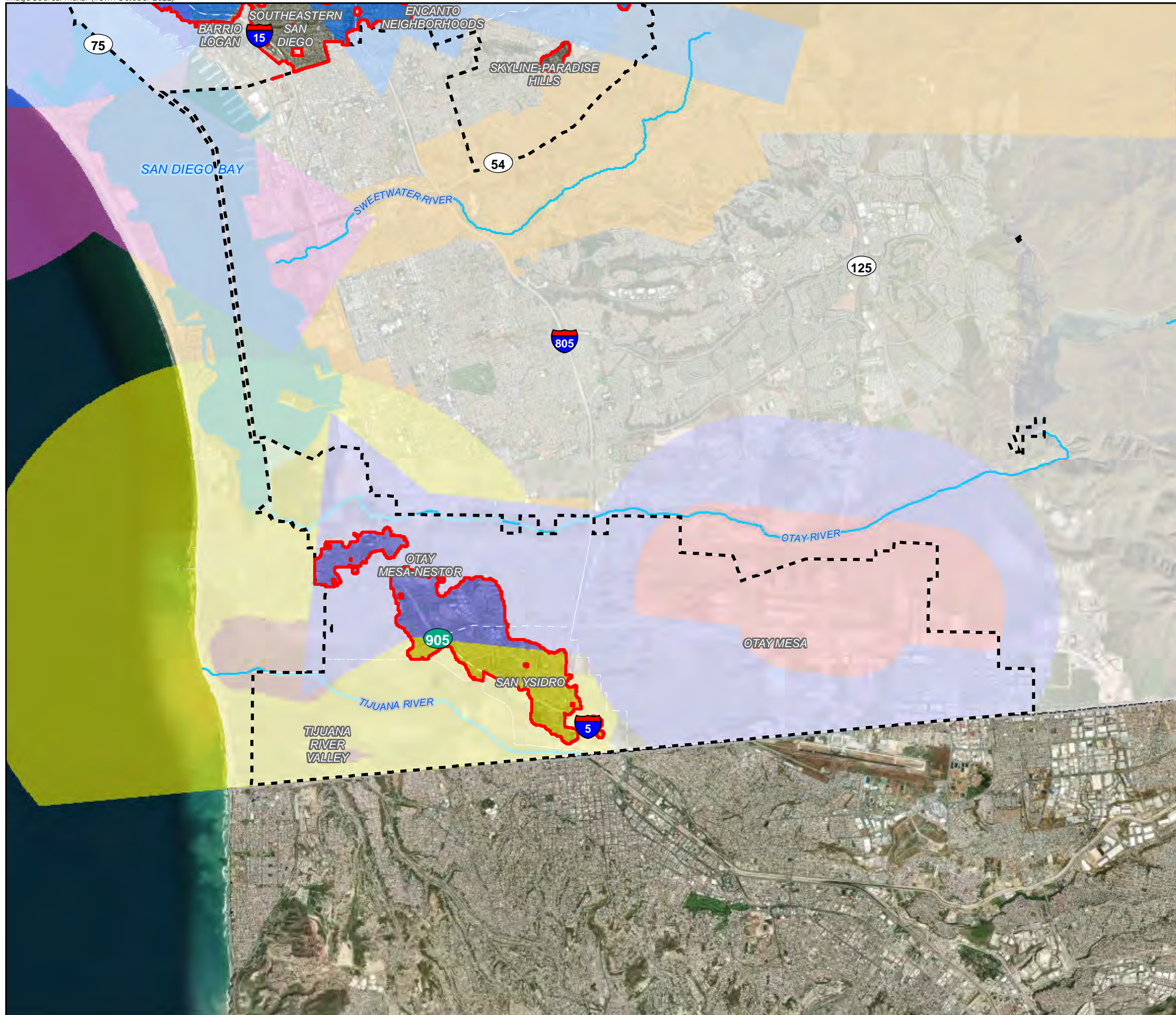
Risks associated with airport operations include risks to people and property located in the vicinity of an airport in the event of an accident, and risks to the safety of persons aboard an aircraft. Airspace protection policies may address the height of objects on the ground and activities that can cause electronic or visual impairment to navigation or attract large numbers of birds (California Department of Transportation [Caltrans] 2011).

Portions of the project areas are located within the Airport Influence Areas (AIAs) of five airports including the SDIA, Montgomery-Gibbs Executive Airport, MCAS Miramar, NOLF Imperial Beach, and Brown Field Municipal Airport (Brown Field). AIAs in relation to the Climate Smart Village Areas are depicted in Figure 4.10-2a through 4.10-2e. AIAs in relation to the Hillcrest FPA area and the University CPU area are shown on Figures 4.10-3 and 4.10-4, respectively.

#### **a. San Diego International Airport**

SDIA at Lindbergh Field is the commercial air carrier airport serving the region located in the City's urban center and is adjacent to downtown. Aircraft operations averaged 543 trips per day over a 12-month period ending May 2018. Ninety percent of operations were commercial, and the remainder were air taxi, transient general aviation, and military. Although various industrial, commercial, and residential uses surround the airport, residential is the primary use and the most affected by the airport. Primarily commercial air carrier aircraft with a limited number of general aviation corporate jet aircraft use SDIA. The airport has one runway with approaches from the east and west. Normally, aircraft arrive from the east and depart to the west. Noise from aircraft taking off and climbing affects more areas west or adjacent to SDIA, whereas noise from aircraft approaching and landing affects fewer areas east of the airport. Commercial aircraft noise has been declining due to advances in engine technology. However, noise will affect more areas as operations at SDIA increase in the future.





- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Airport Influence Area (AIA)**
  - Brown Field Review Area 1
  - Brown Field Review Area 2
  - NOLF Imperial Beach Review Area 1
  - NOLF Imperial Beach Review Area 2
  - North Island NAS Review Area 1
  - North Island NAS Review Area 2
  - San Diego International Airport (Lindbergh Field) Review Area 2

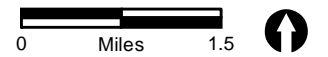
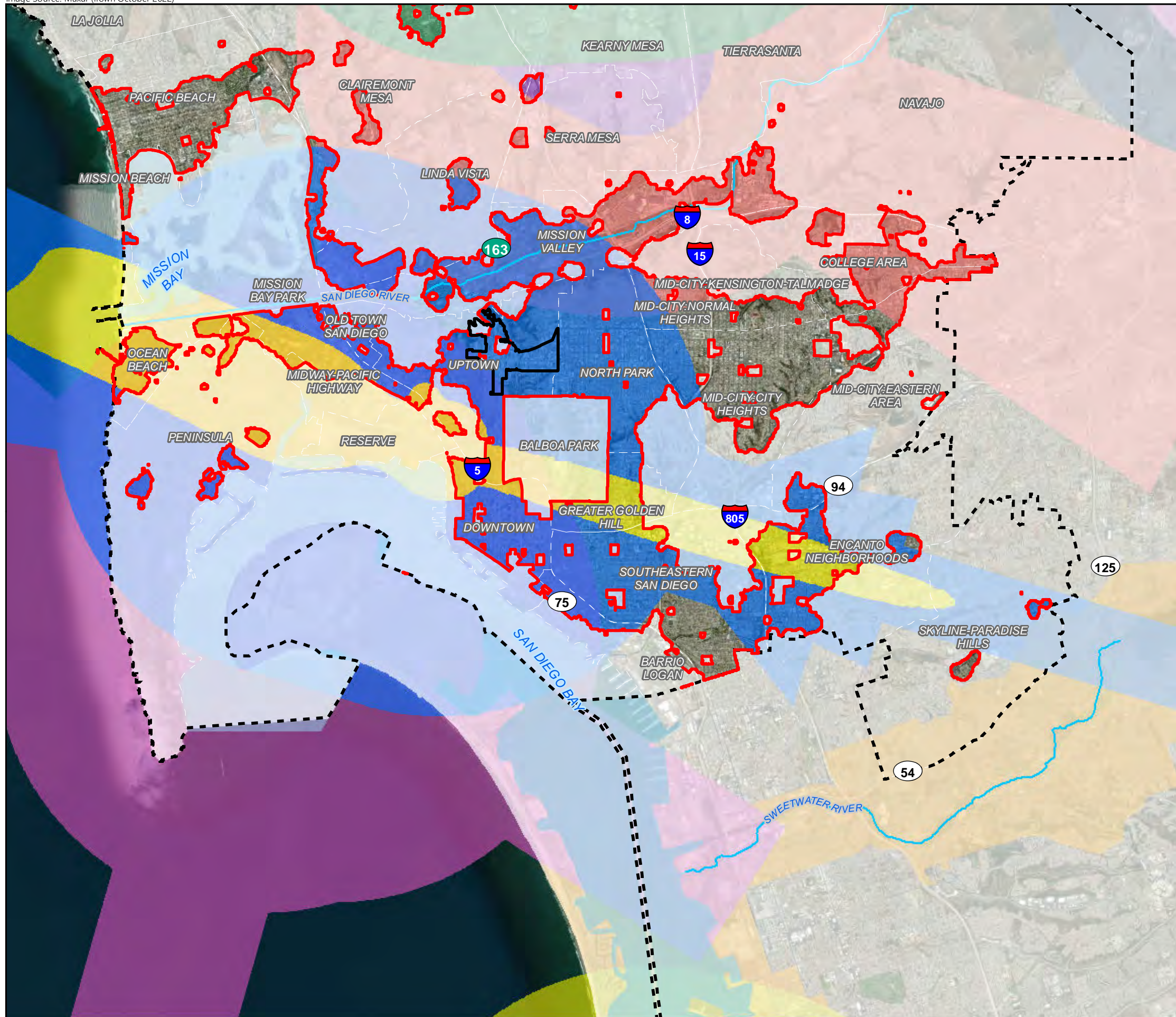


FIGURE 4.10-2a  
Airport Influence Areas (AIAs)  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South





- Hillcrest Focused Plan Amendment Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Airport Influence Area (AIA)**
- Gillespie Field Review Area 1
- Gillespie Field Review Area 2
- Miramar Review Area 2
- Montgomery Field Review Area 1
- Montgomery Field Review Area 2
- NOLF Imperial Beach Review Area 2
- North Island NAS Review Area 1
- North Island NAS Review Area 2
- San Diego International Airport (Lindbergh Field) Review Area 1
- San Diego International Airport (Lindbergh Field) Review Area 2

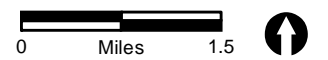
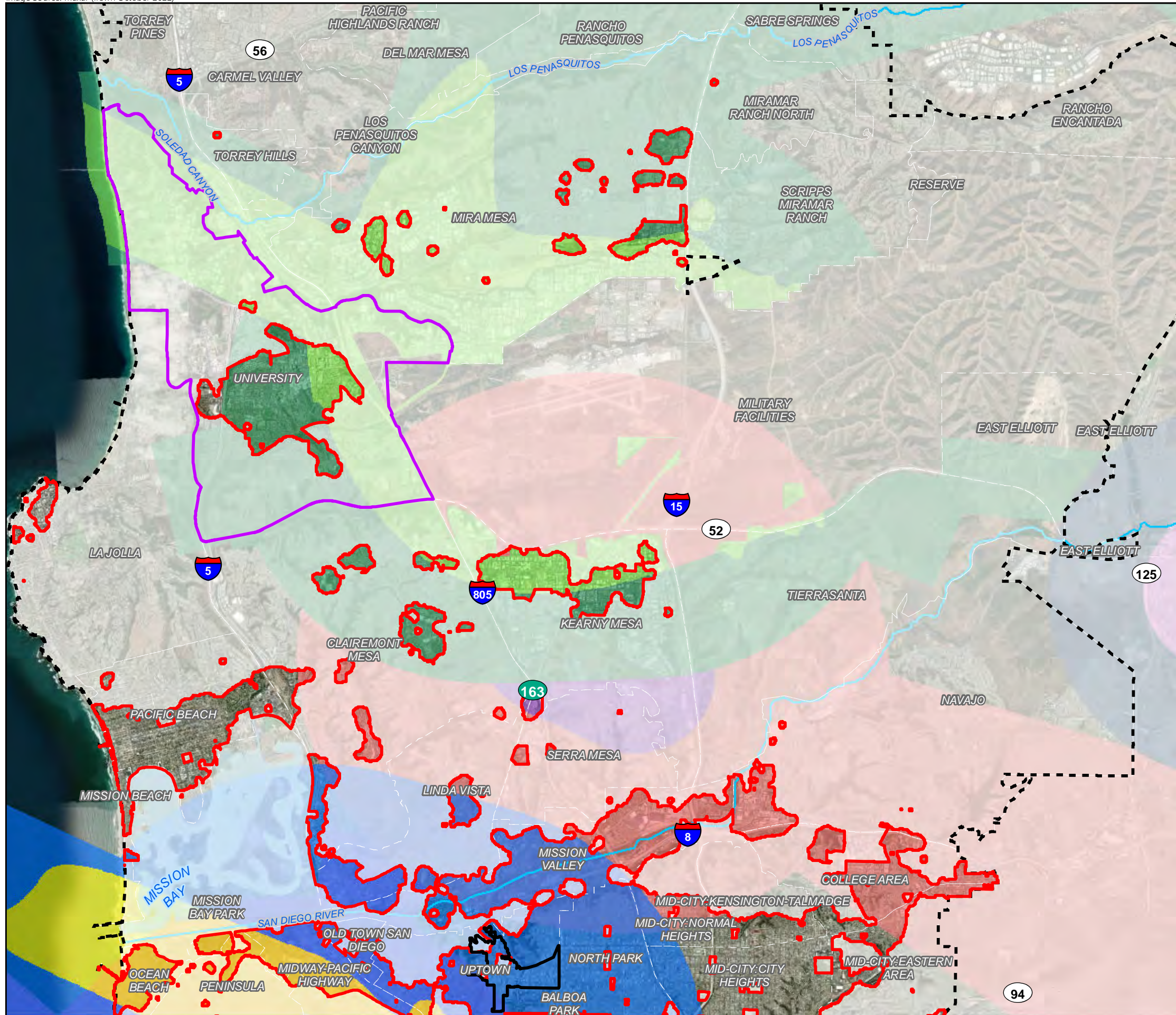


FIGURE 4.10-2b  
Airport Influence Areas (AIAs)  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South Central





- Hillcrest Focused Plan Amendment Area
  - University Community Plan Update Area
  - Blueprint SD Initiative Climate Smart Village Areas
  - San Diego City Limits
- Airport Influence Area (AIA)**
- Gillespie Field Review Area 1
  - Gillespie Field Review Area 2
  - Miramar Review Area 1
  - Miramar Review Area 2
  - Montgomery Field Review Area 1
  - Montgomery Field Review Area 2
  - North Island NAS Review Area 1
  - North Island NAS Review Area 2
  - San Diego International Airport (Lindbergh Field) Review Area 1
  - San Diego International Airport (Lindbergh Field) Review Area 2

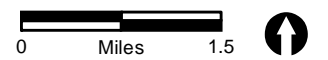
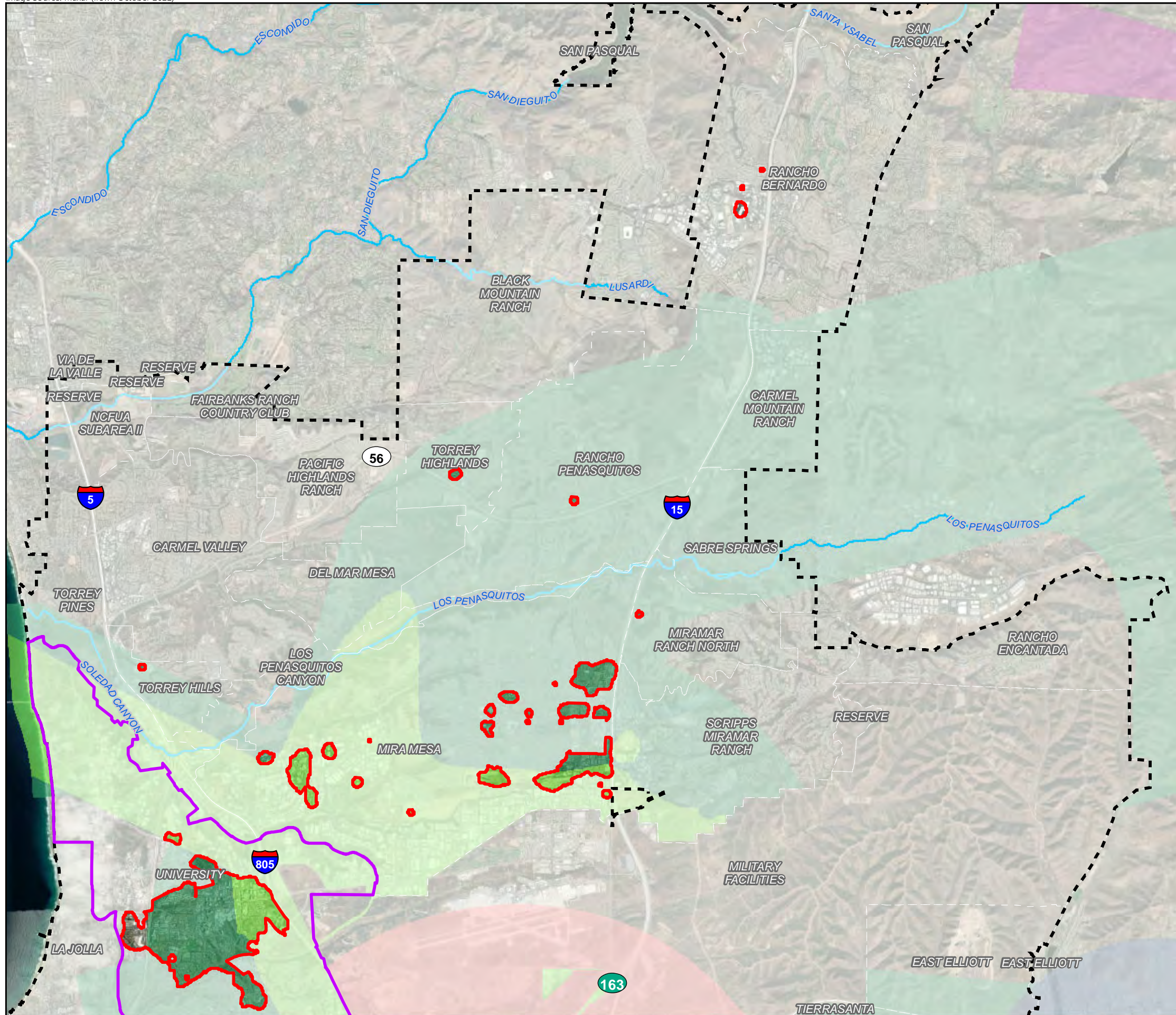


FIGURE 4.10-2c  
 Airport Influence Areas (AIAs)  
 in Relation to Blueprint SD Initiative  
 Climate Smart Village Areas - North Central





- University Community Plan Update Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Airport Influence Area (AIA)**
- Gillespie Field Review Area 2
- Miramar Review Area 1
- Miramar Review Area 2
- Montgomery Field Review Area 2
- Ramona Review Area 2

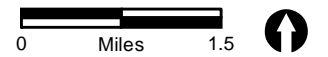
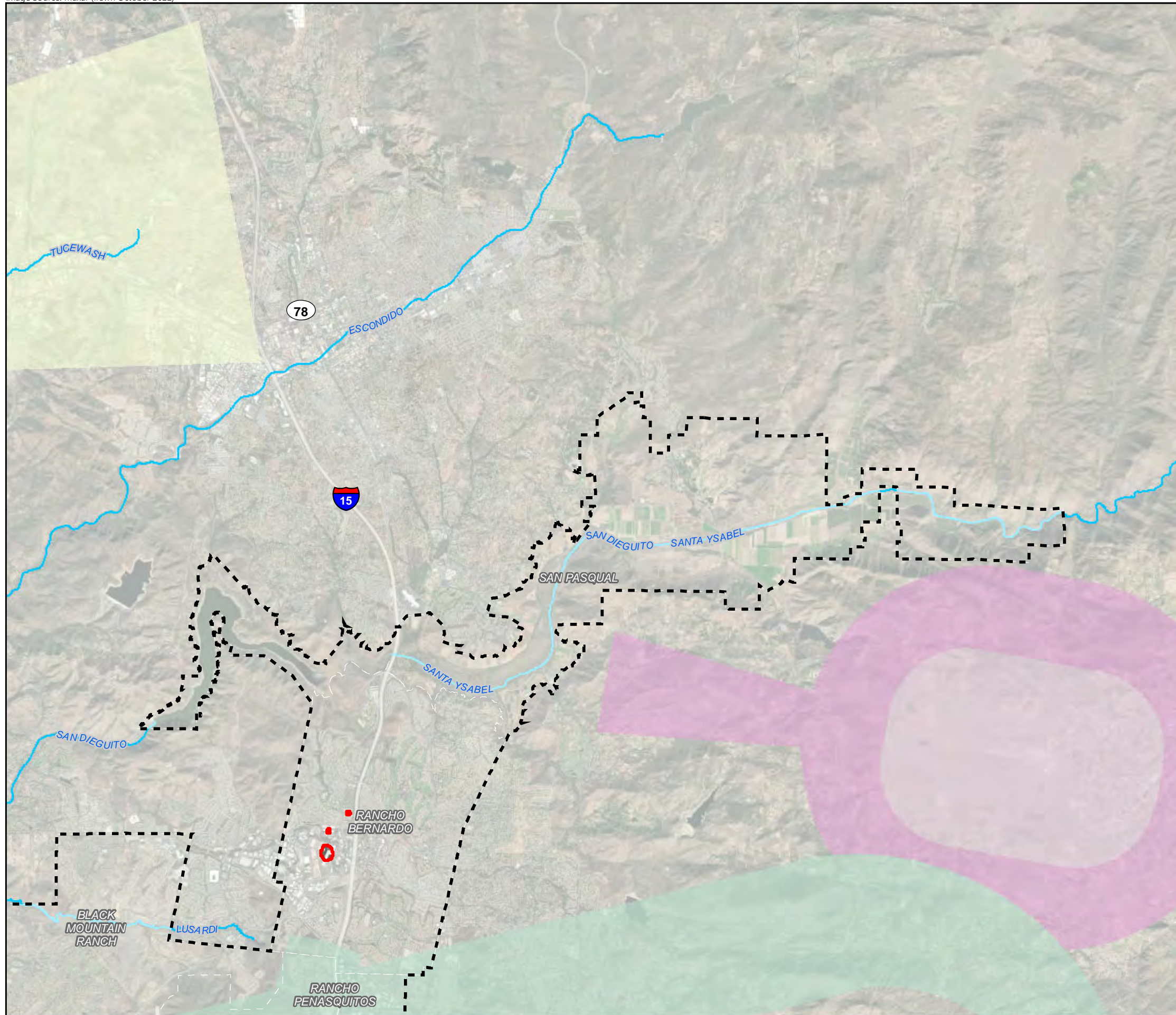








FIGURE 4.10-2d  
Airport Influence Areas (AIAs)  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
- Airport Influence Area (AIA)**
-  McClellan-Palomar Review Area 2
-  Miramar Review Area 2
-  Ramona Review Area 1
-  Ramona Review Area 2

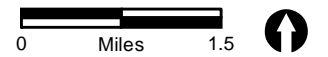
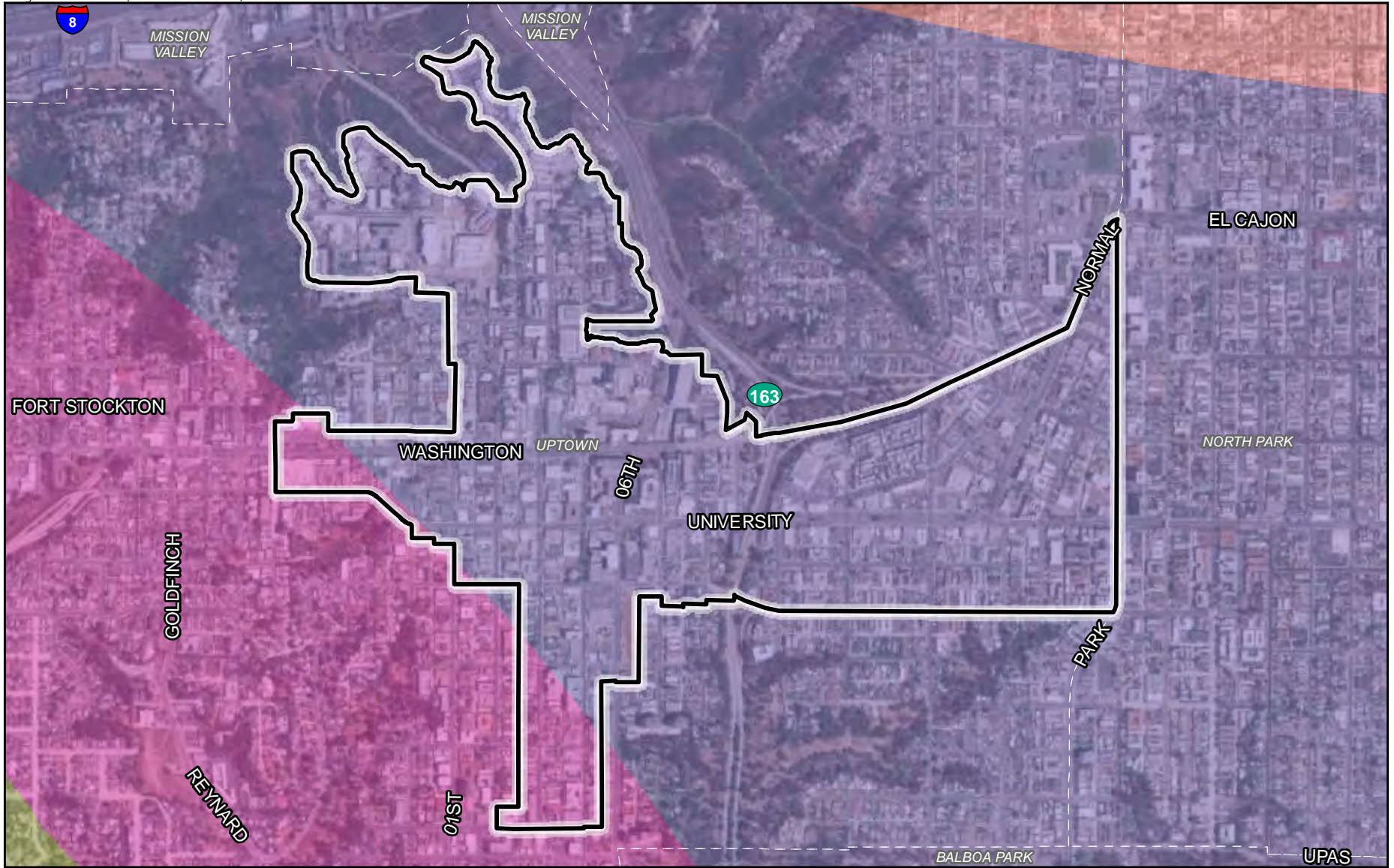






FIGURE 4.10-2e  
Airport Influence Areas (AIAs)  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - Northeast





 Hillcrest Focused Plan Amendment Area

**Airport Influence Area (AIA)**

-  Lindbergh Field Review Area 1
-  Lindbergh Field Review Area 2
-  Montgomery Field Review Area 2
-  North Island NAS Review Area 1

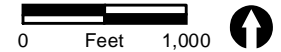
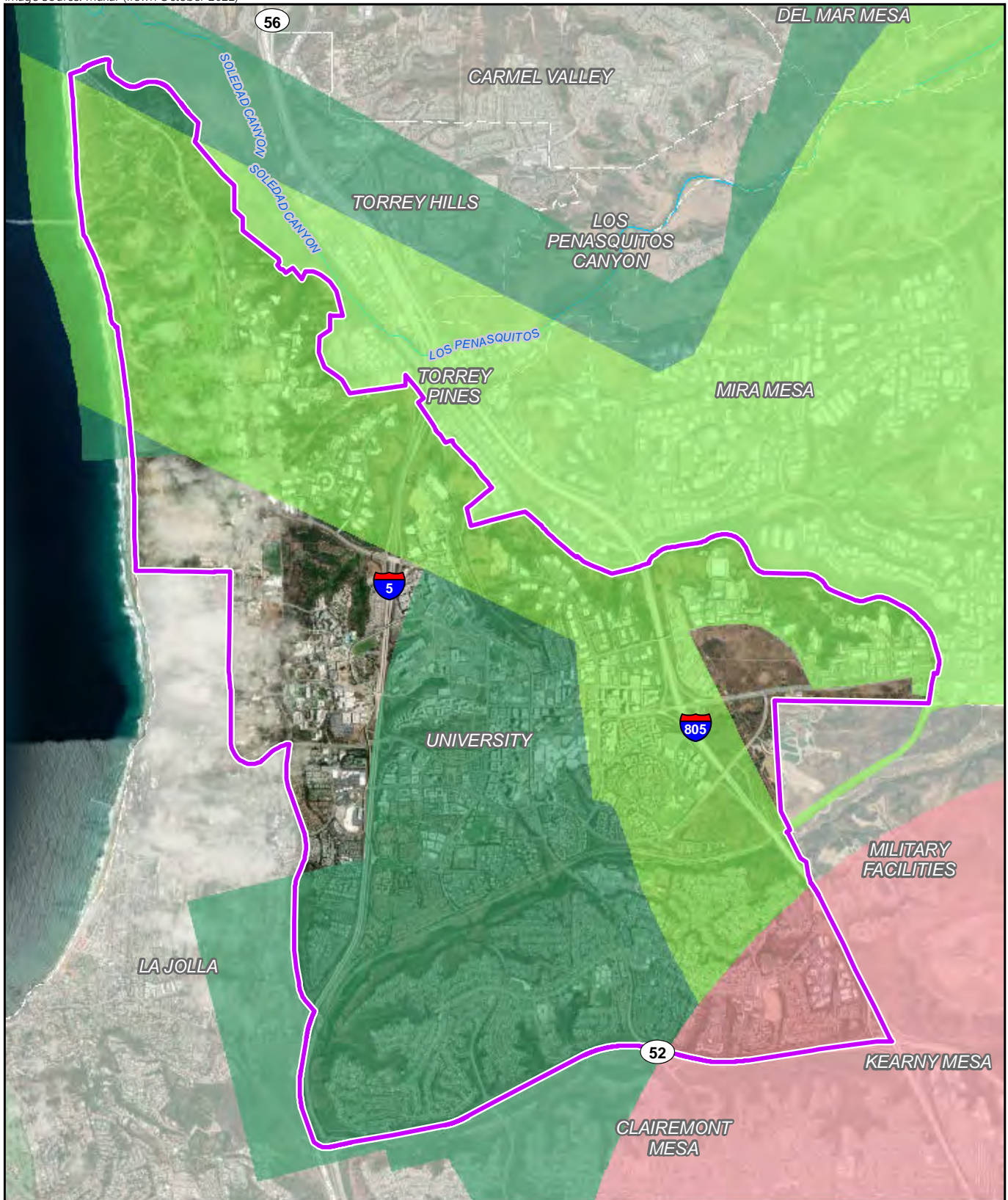






FIGURE 4.10-3  
Airport Influence Areas (AIAs) in Relation to  
Hillcrest Focused Plan Amendment Area





-  University Community Plan Update Area
- Airport Influence Area (AIA)**
-  Miramar Review Area 1
-  Miramar Review Area 2
-  Montgomery Field Review Area 2

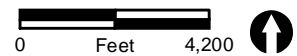


FIGURE 4.10-4  
Airport Influence Areas (AIAs) in Relation to  
University Community Plan Update Area

The SDIA requires a variance from the California Airport Noise Standards in order to operate with noise in excess of the 65 A-weighted decibels [dB(A)] Community Noise Equivalent Level (CNEL) affecting residential uses. As the airport operator, the San Diego County Regional Airport Authority (SDCRAA) has implemented monitoring and mitigation measures to minimize aircraft noise affecting residential areas. The SDIA prohibits most late-night takeoffs to help limit noise impacts. As a mitigation measure, the Quieter Home Program retrofits affected homes to reduce interior noise levels to an acceptable level. The variance requires that the SDCRAA obtain aviation easements for new residential uses and other noise sensitive uses above the 60 dB(A) CNEL and for participating homes in the Quieter Home Program.

Communities surrounding SDIA contain existing and planned areas for residential uses including higher-density residential uses. Higher-density residential structures use construction materials that can mitigate higher exterior noise levels to acceptable levels. Higher-density residential uses also contain limited outdoor areas, which limit the length of outdoor exposure to higher noise levels. Given the geographic extent of the areas above the 65 dB(A) CNEL within the SDIA airport influence area and the desire to maintain and enhance the character of these neighborhoods, the City conditionally allows future single home, multiple home, and mixed-use residential uses in the areas above the 65 dB(A) CNEL.

Although not generally considered compatible with aircraft noise, the City conditionally allows multiple home development and mixed-use residential uses above the 65 dB(A) CNEL only in areas with existing residential uses, and single unit home residential uses only on existing single unit home lots. Any future residential use above the 65 dB(A) CNEL must include noise attenuation measures to ensure an interior noise level of 45 dB(A) CNEL, provision of an aviation easement, and be located in an area where a community plan and the ALUCP allow residential uses.

## **b. Montgomery-Gibbs Executive Airport**

Montgomery-Gibbs Executive Airport (formerly known as Montgomery Field) is a general aviation airport and is classified by the Federal Aviation Administration (FAA) as a reliever airport for SDIA. A reliever airport is an airport that serves general aviation aircrafts that might otherwise use a congested air carrier airport. The airport has three runways and a helipad. Aircraft operations averaged 567 trips per day over a 12-month period ending in April 2017. Fifty-one percent of operations were local general aviation, 46 percent were transient general aviation, and the remainder were air taxi, military, or commercial operations (Airnav 2018).

Due to the length of its runways, Montgomery-Gibbs Executive Airport Field cannot accommodate all types of general aviation aircraft. Noise-compatible commercial and industrial uses are adjacent to the airport. Aircraft noise affects residential areas in surrounding communities. To minimize the impact on surrounding residential areas, Montgomery-Gibbs Executive Airport Field has a noise monitoring program to assess aircraft noise and regulations, including nighttime noise limits and a weight limit for aircraft using the airport.

## **c. Marine Corps Air Station Miramar**

MCAS Miramar operates a mixture of jet fighter, transport, and helicopter aircrafts. MCAS Miramar serves as home to the 3<sup>rd</sup> Marine Aircraft Wing, including MAG-11's fixed-wing F/A-18 and KC-130

Hercules squadrons and MAG-16's MV-22 Osprey tiltrotors and CH-53E Super Stallion helicopters. The support command Marine Air Control Group 38, the 3<sup>rd</sup> MAW Band, the 4<sup>th</sup> Marine Air Wing, an MV-22 Osprey squadron, the H&HS Marine Flight Division's UC-12, and UC-38 squadrons are also located at MCAS Miramar (MCAS Miramar 2019). Noise from military air installations presents different noise issues compared to civilian airports. Military readiness requires constant training. Aircraft training includes touch and goes (takeoffs and landings with a close-in circuit around the airport), aircraft carrier simulated landings, practice instrument approaches, and normal departures to and arrivals from other installations or training areas. As a result, noise can affect more areas than from civilian airports. Helicopter noise can be an annoyance since helicopter noise events last longer and pulsate.

As indicated by the Air Installations Compatibility Use Zones (AICUZ) study, adjacent industrial and commercial uses are compatible with MCAS Miramar's noise levels. Noise from MCAS Miramar affects residential areas in surrounding communities. To minimize aircraft noise impact on residential areas, the Marine Corps implements noise abatement and monitoring programs as described in the AICUZ study.

#### **d. Brown Field**

Brown Field is a port of entry for private aircrafts coming from Mexico. Brown Field is a busy general aviation airport. General aviation encompasses all aviation except air carrier and military, although the military continues to maintain a strong presence. The types of general aviation aircrafts that operate at Brown Field include private, corporate, charter, air ambulance, law enforcement, fire rescue, flight training, cargo, skydiving, banner towing, and airships (City of San Diego 2019a).

General aviation propeller and jet aircraft, as well as law enforcement and military aircraft, use Brown Field. Noise-compatible open space and industrial uses are primarily adjacent to Brown Field. Aircraft noise affects residential uses to the west of the airport.

#### **e. NOLF Imperial Beach**

NOLF Imperial Beach is a part of the South Bay community, between Imperial Beach and the United States-Mexico border. It is nine miles south of the City and is connected to Coronado by the Silver Strand Beach and Causeway. Almost half of NOLF's 1,100 acres are a part of the Tijuana River National Estuarine Research Reserve. It is the only exclusive-use Naval helicopter airfield on the West Coast (Millie 2019).

#### **f. Airports Outside of the City**

Aircraft noise from airports outside of the City is also less extensive than noise from SDIA and MCAS Miramar. Military aircraft operations at Naval Air Station (NAS) North Island and NOLF Imperial Beach primarily use the airspace over the Pacific Ocean and the San Diego Bay. The primary traffic pattern for helicopters training at NOLF Imperial Beach is along the Tijuana River Valley and then offshore. Overflight noise from general aviation aircraft operating at Gillespie Field has the potential to affect residential areas in the City west of the airport. Aircraft noise from commercial air carrier

operations at the Tijuana International Airport in Mexico primarily affect open space and industrial uses adjacent to the international border in the Otay Mesa area.

## 4.10.2 Regulatory Setting

### 4.10.2.1 State Regulations

#### a. State Airport Land Use Commission Statute

Public Utilities Code Section 21675 requires each airport land use commission (ALUC) to formulate an ALUCP for each public-use and military airport within the ALUC's oversight. The State Legislature assigned the ALUC function in San Diego County to the SDCRAA. After the ALUC adopts an ALUCP, local agencies with jurisdiction within the AIA covered by the ALUCP must either amend their land use plans and regulations to be consistent with the ALUCP or overrule the ALUCP. A local agency can overrule the ALUCP (or a part of the ALUCP) with a two-thirds majority vote of its governing body. The overrule resolution must include findings describing how the local agency's current land use plans and regulations achieve the objectives of the State ALUC statute.

#### b. Sustainable Communities and Climate Protection Act of 2008

The Sustainable Communities and Climate Protection Act of 2008 (Chapter 728, Statutes of 2008), otherwise known as Senate Bill (SB) 375, requires the integration of land use, housing, and transportation planning to achieve regional greenhouse gas (GHG) emission reductions, adopted by the California Air Resources Board. SB 375 requires Metropolitan Planning Organization (MPOs) to develop a Sustainable Communities Strategy—a new element of the regional transportation plan—to plan for achieving these GHG reduction targets. The Sustainable Communities Strategy must demonstrate the attainment of the regional GHG emissions reduction targets while accommodating the full projected population of the region.

#### c. California Coastal Act of 1976

The California Coastal Act applies to all Coastal Zone areas in the state. Coastal Act policies are carried out on a local level through LCPs, which implement the Coastal Act taking local conditions into consideration. LCPs consist of land use plans that govern the types and intensities of allowable uses, as well as the applicable parts of the zoning code that carry out the land use plan, consistent with the Coastal Act. Section 30253 of the Coastal Act requires new development to assure stability and structural integrity, and to not require shoreline protective devices that would alter natural landforms along bluffs and cliffs. In other words, new development must be safe from coastal hazards.

#### d. State Aeronautics Act

Through the State Aeronautics Act, every county that contains a public airport must develop and comply with an ALUCP with a 20-year planning horizon. The purpose of an ALUCP is to protect public health, safety, and welfare by providing for the orderly growth and land use development of the

area surrounding the airport. ALUCP policies generally set controls on land use and development standards that ensure safe and efficient airport and flight operations and minimize the public's exposure to excessive noise and safety hazards within the airport's vicinity. An ALUCP does not designate land uses, but instead establishes criteria to encourage the development of compatible land uses. It also has no ability to alter existing non-conforming uses; the focus is on future development. The body responsible for creating and carrying out the ALUCP is each respective county's ALUC or other designated agency. The SDCRAA serves as the ALUC for San Diego County.

## 4.10.2.2 Local Plans and Regulations

### a. San Diego Forward: The 2021 Regional Plan

SANDAG is the regional authority that creates regional -specific documents to provide guidance to local agencies, as SANDAG does not have land use authority. The 2021 Regional Plan (Regional Plan) was adopted by the SANDAG Board of Directors on December 10, 2021 (SANDAG 2021). The Regional Plan provides a long-term blueprint for the San Diego region that seeks to meet regulatory requirements, address traffic congestion, and create equal access to jobs, education, healthcare, and other community resources.

The Regional Plan is intended to provide a plan for future growth through the year 2050 based on principles of sustainability and smart growth. It is intended to result in more compact development patterns with greater emphasis on use of transit and less need to rely on private vehicle travel; it is to be updated every four years to monitor its progress. The Regional Plan contains the following required elements: Policy Element; Sustainable Communities Strategy; Financial Element; and Action Element.

Relevant objectives of the Regional Plan include the following:

- Healthy and complete communities.
- Create great places for everyone to live, work, and play.
- Connect communities through a variety of transportation choices that promote healthy lifestyles, including walking and biking.
- Increase the supply and variety of housing types—affordable for people of all ages and income levels in areas with frequent transit service and with access to a variety of services.

### b. Airport Land Use Compatibility Plans

The SDCRAA serves as the ALUC for San Diego County. The ALUC is responsible for adopting ALUCPs for 16 public use and military airports in San Diego County. ALUCPs provide guidance on appropriate land uses surrounding airports to protect the health and safety of people and property within the vicinity of an airport, as well as the public in general. An ALUCP contains policies and criteria that address compatibility between airports and the future land uses that surround them in the areas of noise, overflight, safety, and airspace protection, in order to minimize the public's exposure to hazards within the AIA for each airport. Each AIA is divided into two review areas. Review Area 1 is defined by the combination of the 60 decibel (dB) CNEL noise contour, the outer boundary of all safety zones, and the airspace Threshold Siting Surfaces. Review Area 1 consists of

locations where noise or safety concerns may necessitate limitations on the types of land use actions. All compatibility policies and standards in the ALUCP apply within Review Area 1. Review Area 2 is defined by the combination of the airspace protection and overflight boundaries beyond Review Area 1. Only airspace protection and overflight policies and standards apply within Review Area 2. The ALUC has no jurisdiction over the operation of airports or over existing land uses, regardless of whether or not such uses are incompatible with airport activities. Once ALUCPs have been adopted by the ALUC, local agencies with land located within the AIA boundary for any of the airports must, by law, amend their planning documents to conform to the applicable ALUCP. However, if a local agency makes special findings in accordance with state law, it can override the ALUCPs with a two-thirds vote of its governing body. Since the ALUC does not have land use authority, the City implements the compatibility plans through land use plans and zoning regulations (specifically, the Airport Approach Overlay Zone, Airport Environs Overlay Zone, and Airport Land Use Compatibility Overlay Zone. Until the policies of an ALUCP have been adopted by a local jurisdiction, ALUC consistency review for all development projects within AIA Review Area 1 is required. After the policies of an ALUCP have been implemented by a local jurisdiction, only land use plan adoptions or amendments, rezonings, and regulatory amendments require ALUC consistency review.

The objective of the airspace protection policies and standards is to ensure new development around airports does not interfere with safe and efficient air navigation. Policies include requirements limiting construction or objects exceeding 200 feet in height; sources of glare or lighting systems that can distract pilots; sources of dust, vapor, smoke, and thermal plumes; electromagnetic interference; and bird attractants. Overflight compatibility policies require an overflight notification agreement to be recorded for any new dwelling unit within the overflight area. In Review Area 2, ALUC review is required for land use plans and regulations proposing increases in height limits and for land use projects that have received from the FAA a Notice of Presumed Hazard, a Determination of Hazard, or a Determination of No Hazard subject to conditions, limitations, or marking and lighting requirements; and/or would create any of the following hazards: glare, lighting, electromagnetic interference, dust, water vapor, smoke, thermal plumes, and bird attractants.

The purpose of the noise compatibility policies within the ALUCPs is to minimize the exposure of sensitive receptors to levels of aircraft noise that can disrupt the activities involved. The characteristics of the airport and the surrounding community are taken into account in determining the level of noise deemed acceptable for each type of land use.

### ***San Diego International Airport ALUCP***

The SDIA is located in central San Diego between the Peninsula, Midway-Pacific Highway, and the Downtown Community Planning Areas, adjacent to the San Diego Bay. The SDIA ALUCP was adopted on April 3, 2014, and amended May 1, 2014. Each compatibility factor is included in the AIA maps of the ALUCP as Exhibits 1-1, 2-1, 3-1, 4-1, and 5-1. Noise contours and Safety Zones in relation to the project areas are shown on Figures 4.10-5a and 4.10-5b, respectively. As detailed in Table 4.10-1, SDIA noise contours ranging from 60 CNEL to 80 CNEL affect the Climate Smart Village Areas. The



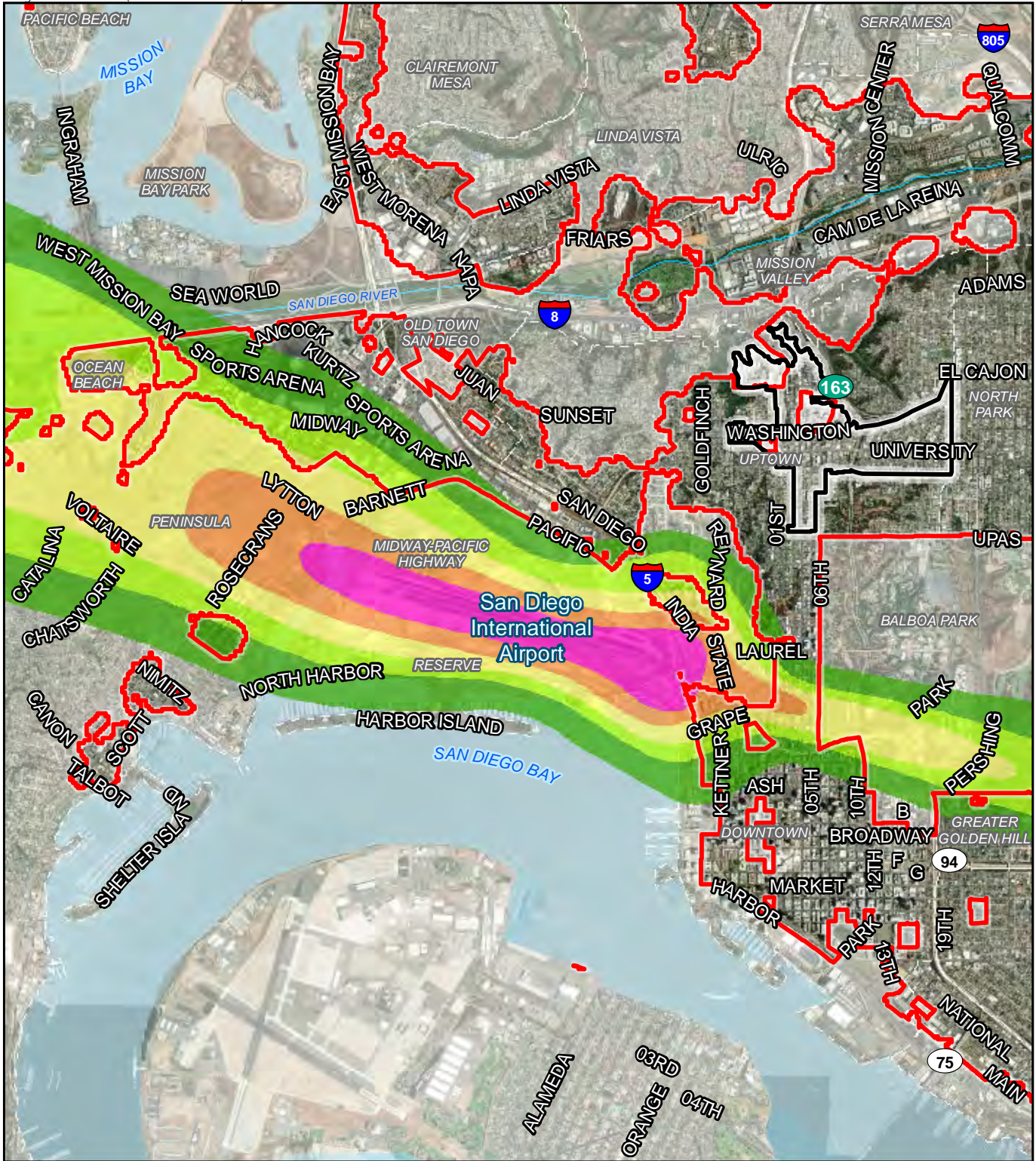
SDIA ALUCP contains the following noise compatibility policies regarding future development associated with the project.

- a) Policy N.1: The ALUCP establishes the 60 dB CNEL contour as the threshold above which noise compatibility standards apply.
- b) Policy N.3: When a land use project involves a combination of different land uses as listed in the ALUCP, each component use must comply with the applicable noise standards.
- c) Policy N.4: New residential development is allowed at or above the 70 dB CNEL contour only if the affected property is currently designated to allow for residential use in the applicable general or community plan and it complies with the conditions described in the ALUCP. In areas exposed to airport noise at or above 70 dB CNEL, general and community plan amendments from non-residential to residential designations are not allowed.

Airport	60 CNEL	65 CNEL	70 CNEL	75 CNEL	80 CNEL
MCAS Miramar	1156	124			
Montgomery-Gibbs Executive Airport	2.3				
San Diego International Airport	851.5	700.8	239.8	49.9	3.04
CNEL = community noise equivalent level					

As detailed in Table 4.10-2, land within the Climate Smart Village areas are located within Safety Zones 2, 3, and 4. In these safety zones, the SDIA ALUCP identifies single and multi-family residential as allowed uses in areas designated for residential in the applicable Community Plan, subject to dwelling unit limitations defined in Table 3-1 of the SDIA ALUCP (SDCRAA 2014).

Airport	San Diego International			Montgomery-Gibbs	MCAS Miramar		
	Zone 2	Zone 3	Zone 4	Zone 6	Transition Zone	Accident Potential Zone 1	Accident Potential Zone 2
Blueprint SD Initiative Climate Smart Village Areas	77.39	101.27	38.87	625.93	174.21		
University CPU Area	-	-	-	-	1,133.3	124.7	2,028.60
SOURCE: SDCRAA 2014, 2010, and 2015							
NOTE: No airport safety zones overlap with the Hillcrest FPA area.							



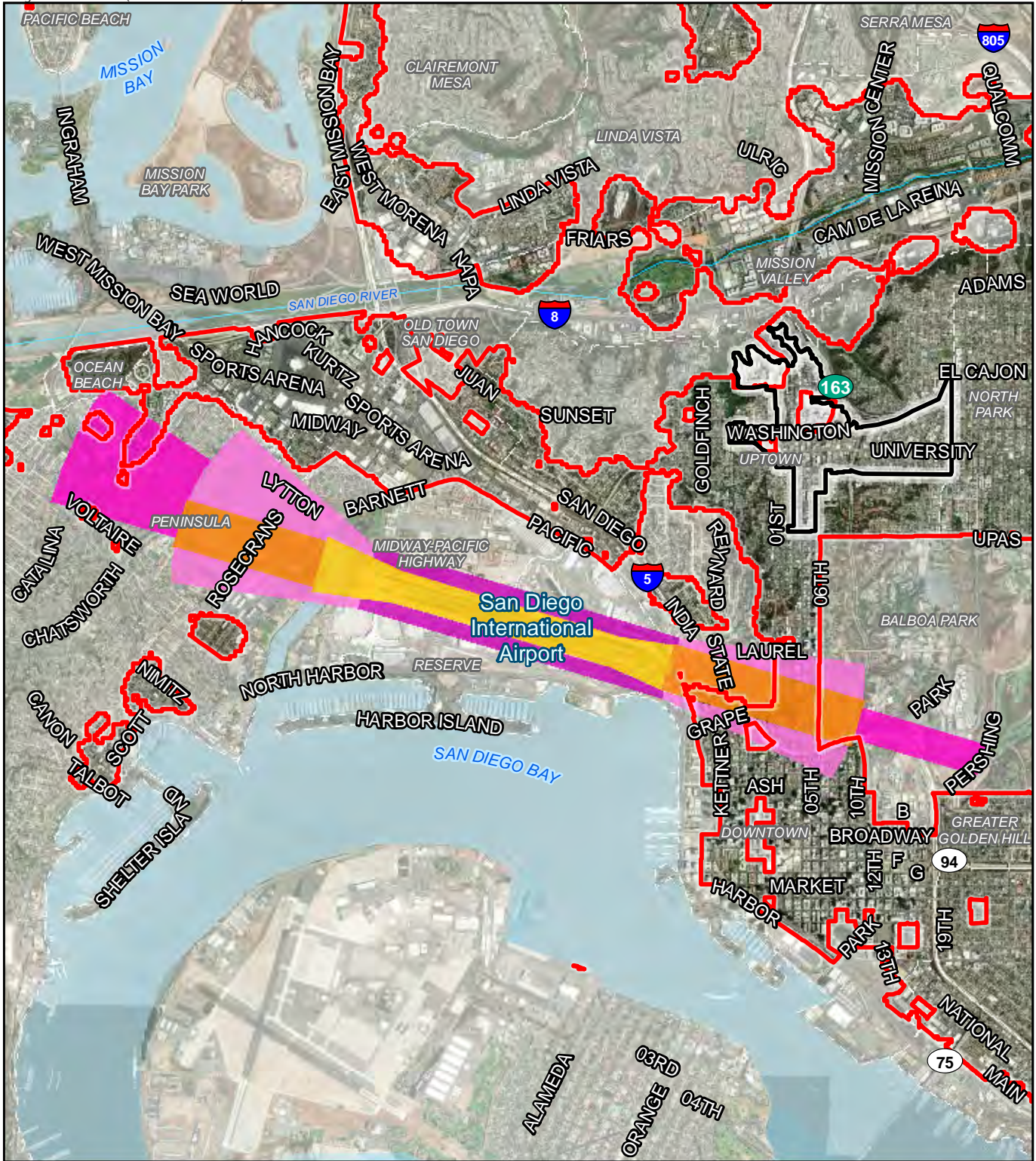
- Hillcrest Focused Plan Amendment Area
- Blueprint SD Initiative Climate Smart Village Areas

- ALUCP Noise**
- 60 CNEL
  - 65 CNEL
  - 70 CNEL
  - 75 CNEL
  - 80 CNEL



FIGURE 4.10-5a  
San Diego International Airport Noise Contours





- Hillcrest Focused Plan Amendment Area
- Blueprint SD Initiative Climate Smart Village Areas

- Airport Safety**
- Zone 1
  - Zone 2
  - Zone 3
  - Zone 4
  - Zone 5



FIGURE 4.10-5b  
San Diego International Airport Safety Zones

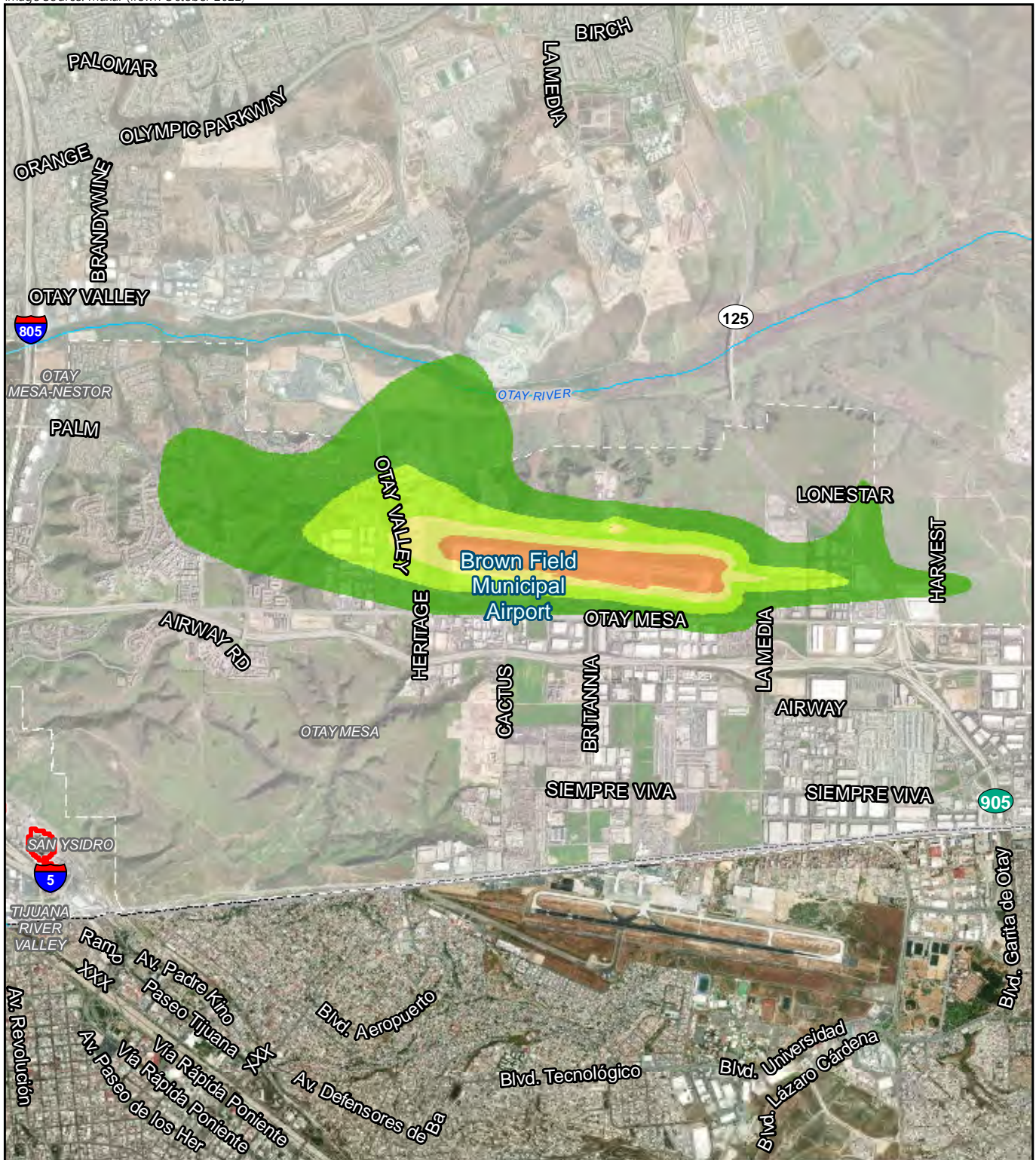
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### ***Brown Field Municipal Airport ALUCP***

Brown Field is located within the Otay Mesa Community Planning area. The Brown Field ALUCP was adopted on January 25, 2010, and amended on December 20, 2010. Each compatibility factor is included in the AIA maps of the ALUCP as Exhibits III-1 through III-6. As shown in Figure 4.10-2a, portions of the project areas are within both AIA Review Areas for Brown Field Airport. No noise contours or safety zones affect the project areas as shown on Figures 4.10-6a and 4.10-6b (SDCRAA 2010a). For development affected by noise contours for Brown Field the following noise compatibility policies would apply:

- a) **Policy 3.3.2: Measures of Noise Compatibility:** The criteria in the ALUCP indicate the maximum acceptable airport-related noise levels, measured in terms of CNEL, for residential and a range of nonresidential land uses. Factors considered in setting the criteria include the following:
  - Established federal and state regulations and guidelines
  - The ambient noise levels in the community. Ambient noise levels influence the potential intrusiveness of aircraft noise upon a particular land use and vary greatly between rural, suburban, and urban communities.
  - The extent to which noise would intrude upon and interrupt the activity associated with a particular use.
  - The extent to which the activity itself generates noise.
  - The extent of outdoor activity associated with a particular land use.
- b) **Policy 3.3.3: Acceptable Noise Levels for Specific Types of Land Use Actions:**
  - The threshold for evaluation is the projected 60 dB CNEL contour. This contour defines the noise impact area of the airport. All land uses located outside this noise contour are consistent with the noise compatibility policies.
  - The maximum airport-related noise level considered compatible for new residential development in the environs of the airport is 65 dB CNEL.
- c) **Policy 3.3.4: Application of Noise Contours to Individual Project Sites to Determine Compatibility:** Projected noise contours are inherently imprecise because, especially at general aviation airports, flight paths and other factors that influence noise emissions are variable and activity projections are always uncertain. Given this imprecision, noise contours shall be utilized, as follows, in assessing the compatibility of a proposed use at a specific development site.
  - In general, the highest CNEL to which a project site is anticipated to be exposed to shall be used in evaluating the compatibility of development over the entire site.
  - An exception to this policy is where no part of the building(s) or residential unit(s) proposed on the site fall within the higher CNEL range; the criteria for the CNEL range where the buildings are located shall apply.





Blueprint SD Initiative Climate Smart Village Areas

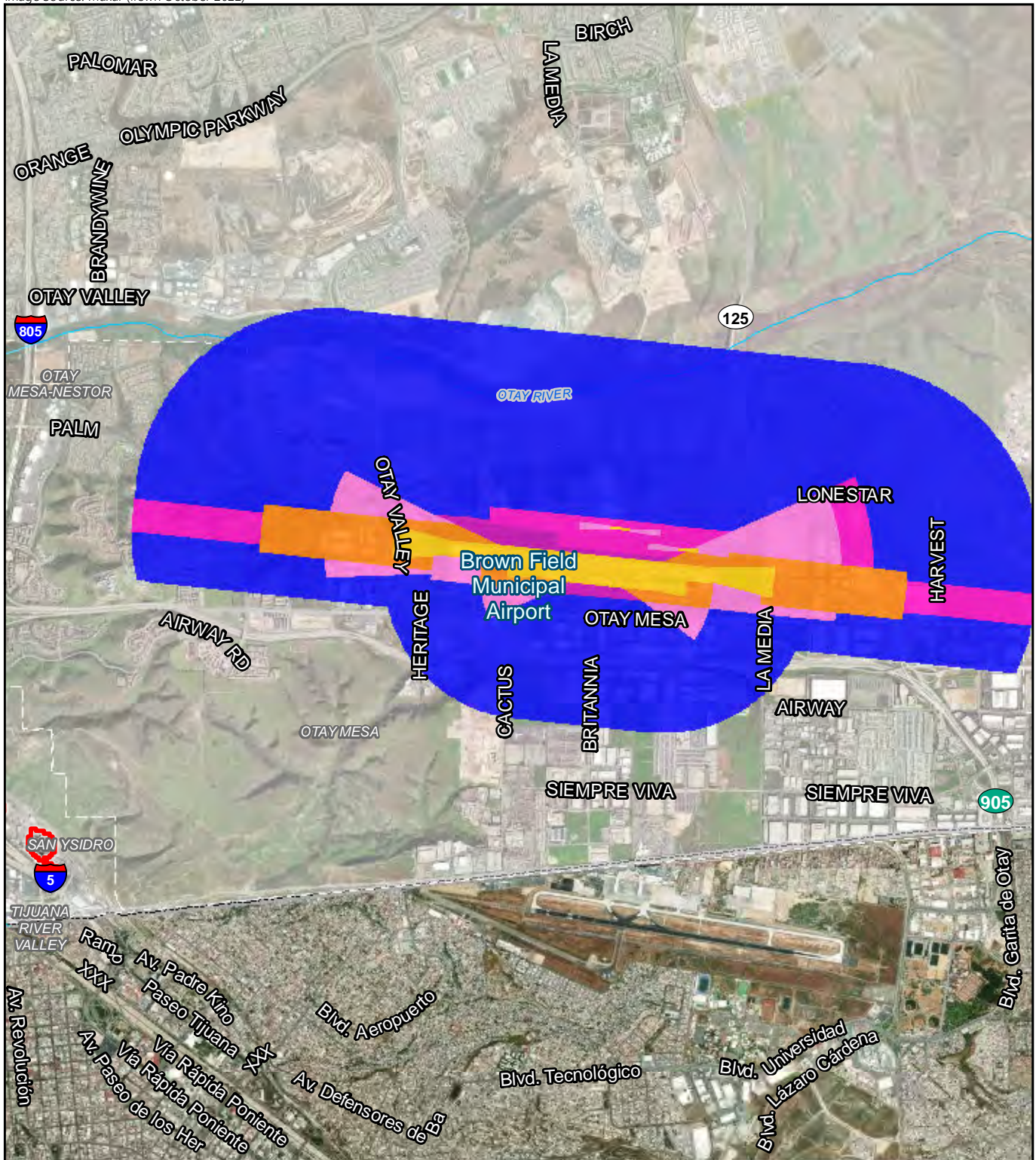
**ALUCP Noise**

- 60 CNEL
- 65 CNEL
- 70 CNEL
- 75 CNEL



FIGURE 4.10-6a  
Brown Field Municipal Airport Noise Contours





Blueprint SD Initiative Climate Smart Village Areas

**Airport Safety**

- Zone 1
- Zone 2
- Zone 3
- Zone 4
- Zone 5
- Zone 6



**FIGURE 4.10-6b**  
Brown Field Municipal Airport Safety Zones

### **Marine Corps Air Station Miramar ALUCP**

The MCAS Miramar ALUCP was adopted on October 2, 2008, and amended on December 20, 2010, and November 3, 2011. MCAS Miramar is located north of State Route 52 and south of the Mira Mesa Community Planning Area. Each compatibility factor is included in the AIA maps of the ALUCP as Exhibits MIR-9, MIR-10, MIR-11, and MIR-12-. The AIA of MCAS Miramar includes lands within four general land use jurisdictions: the County of San Diego and the cities of Poway, San Diego, and Santee. The complete boundaries that comprise the airport's AIA are shown in Figure 4.10-2b through 4.10-2e. As shown, portions of the project areas are located within the MCAS Miramar AIA Review Areas 1 and 2. Figure 4.10-7a shows MCAS Miramar ALUCP airport noise contours in relation to the project areas. Figure 4.10-7b shows the MCAS Miramar ALUCP airport safety zones in relation to the project areas. As detailed in Tables 4.10-1 and 4.10-2, approximately 1,156 acres of land within the Climate Smart Village Areas, largely within the University CPU area are located within the 60 CNEL airport noise contour. An additional 124 acres of Climate Smart Village areas are located within the 65 CNEL airport noise contour. Within the University CPU area, additional land area is located within the 65, 70, and 75 CNEL airport noise contours, as detailed in Table 4.10-3. As detailed in Table 4.10-2, approximately 174 acres of Climate Smart Village areas are located within the Transition Zone for MCAS Miramar. The Transition Zone is the outermost safety zone that was created for the MCAS Miramar ALUCP for low-altitude fixed-wing aircraft. Within the Transition Zone, the ALUCP identifies residential land use of less than or equal to 20 dwelling units per acre as either compatible or conditionally compatible. Within the transition zone, the ALUCP identifies residential density greater than 20 dwelling units per acre as incompatible. Within the University CPU area, additional land is located within the Transition Zone, Accident Potential Zone 1 and Accident Potential Zone 2 (see Table 4.10-2; SDCRAA 2011).

<b>Airport</b>	<b>60 CNEL</b>	<b>65 CNEL</b>	<b>70 CNEL</b>	<b>75 CNEL</b>
MCAS Miramar	1,134	777	289	117

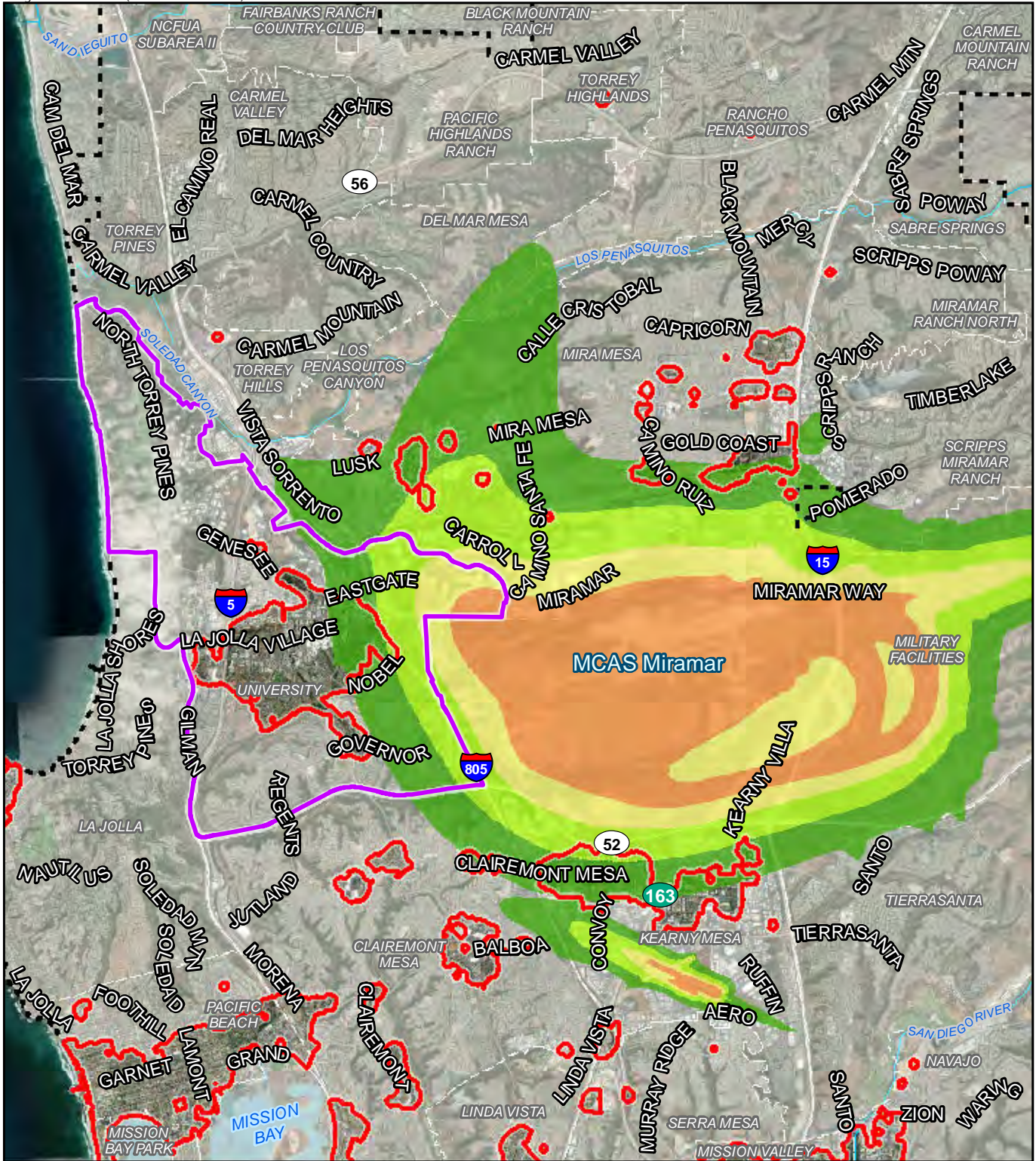
The MCAS Miramar ALUCP contains the following noise compatibility policies regarding future development associated with the project.

- a) Policy 3.3.1: Evaluating Acceptable Noise Levels for New Development: The noise compatibility of proposed land uses within the AIA of MCAS Miramar shall be evaluated in accordance with the policies set forth in the ALUCP.
- b) Policy 3.3.2: Noise Exposure Levels: For noise compatibility planning purposes around MCAS Miramar, the ALUC shall use the projected noise contours as calculated by the U.S. Marine Corps.
- c) Policy 3.3.3: Measures of Noise Compatibility: The criteria in the ALUCP indicate the maximum acceptable airport-related noise levels, measured in terms of CNEL, for residential and various nonresidential land uses.



- d) Policy 3.3.4: Factors Considered in Setting Noise Compatibility Criteria: The principal factors considered in setting noise compatibility criteria for MCAS Miramar are:
- The noise compatibility recommendations set forth in the Air Installations Compatible Use Zone. The California state law (Pub. Util. Code, §21675) requirement that compatibility plans for military airports "shall be consistent with the safety and noise standards in the Air Installation Compatible Use Zone prepared for that military airport."
  - The ambient noise levels in the community. Ambient noise levels influence the potential intrusiveness of aircraft noise upon a particular land use and vary greatly between rural, suburban, and urban communities. For the purposes of this Compatibility Plan, the communities within the MCAS Miramar AIA are considered urban communities.
  - The extent to which noise would intrude upon and interrupt the activity associated with a particular use.
  - The extent to which the activity itself generates noise.
  - The extent of outdoor activity associated with a particular land use.
- e) Policy 3.3.5: Acceptable Noise Levels for Specific Types of Land Use Development: The threshold for MCAS Miramar noise impact evaluation is the projected CNEL 60 dB contour. This contour defines the noise impact area of MCAS Miramar. The majority of land uses located outside this noise contour are consistent with the noise compatibility policies of this section. The federal property that comprises MCAS Miramar is not part of the noise impact area subject to the policies of this Compatibility Plan. The maximum airport-related noise level considered compatible for new residential development in the environs of MCAS Miramar is 65 dB CNEL.
- f) Policy 3.3.6: Parcels Located Within 2 or More Noise Exposure Contours: Noise contours shall be utilized as follows in assessing the proposed use of a specific development site.
- Where no part of the building(s) proposed on the site fall within the higher CNEL range, the criteria for the CNEL range where the proposed building(s) are located shall apply for the purposes of evaluating the compatibility of the proposed uses and for determining sound attenuation and other requirements.
  - Where the proposed building(s) fall within multiple CNEL ranges, the criteria for the highest CNEL range where the proposed building(s) are located shall apply for purposes of evaluating the compatibility of the proposed use and for the purposes of determining sound attenuation and other requirements.

The airspace protection zones established for the purpose of evaluating the airspace compatibility of land use development in the AIA of MCAS Miramar represent the imaginary surfaces defined for the airport in accordance with the Federal Aviation Regulations Part 77 height notification area and airspace protection surfaces and are areas intended for the safe use of the airport airspace.

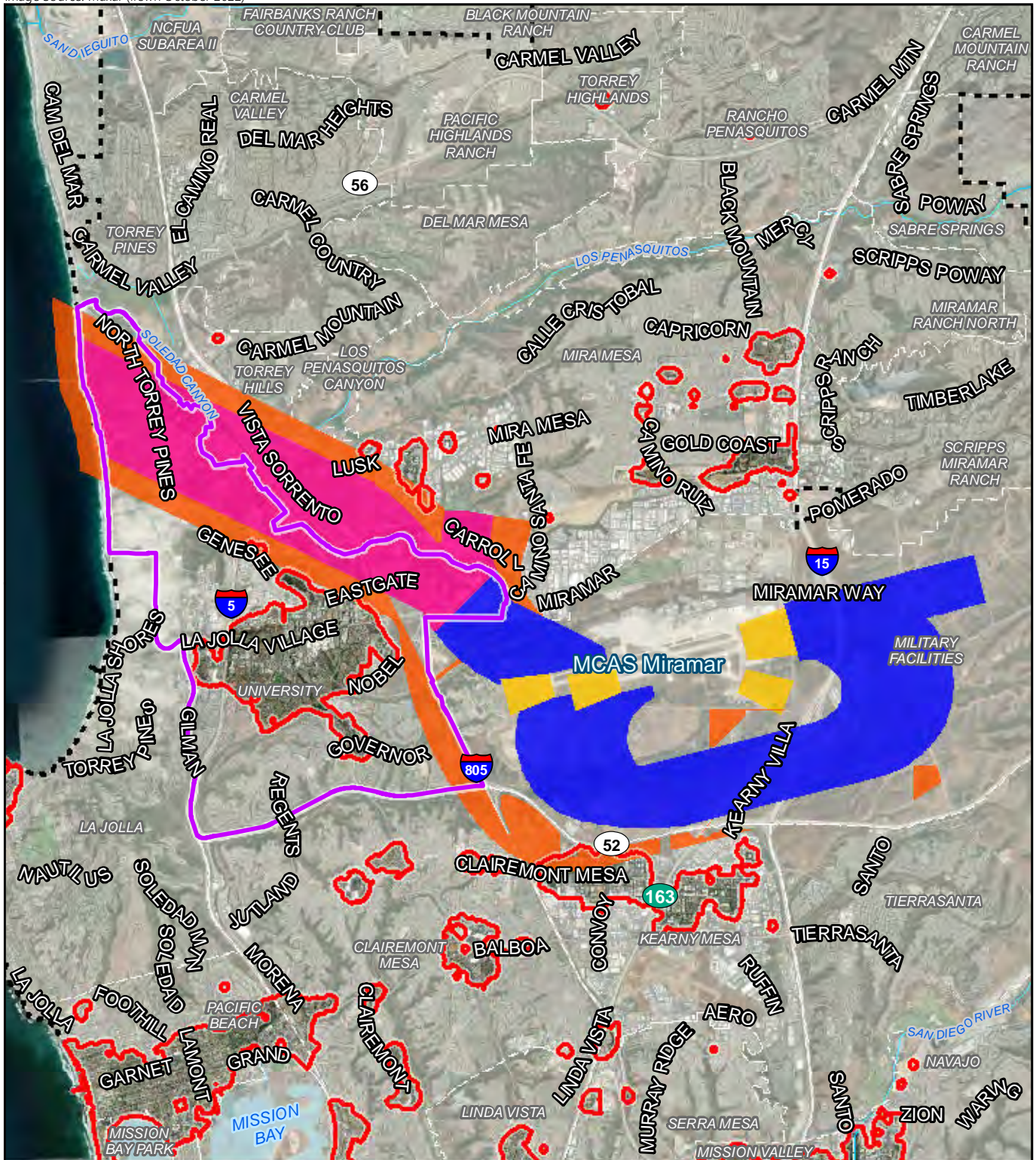


- University Community Plan Update Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- ALUCP Noise**
- 60 CNEL
- 65 CNEL
- 70 CNEL
- 75 CNEL



FIGURE 4.10-7a  
Marine Corps Air Station (MCAS)  
Miramar Airport Noise Contours





- University Community Plan Update Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Airport Safety**
- Accident Potential Zone 1
- Accident Potential Zone 2
- Clear Zone
- Transition Zone

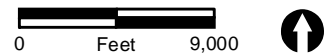


FIGURE 4.10-7b  
 Marine Corps Air Station (MCAS)  
 Miramar Airport Safety Zones

### **Montgomery-Gibbs Executive Airport ALUCP**

The ALUCP for the Montgomery-Gibbs Executive Airport, also known as Montgomery Field was adopted on January 25, 2010, and amended December 20, 2010. Montgomery Field has since been renamed to Montgomery-Gibbs Executive Airport. Each compatibility factor is included in the AIA maps included as Exhibits III-1 through III-5 of the ALUCP. The complete boundaries that comprise the airport's AIA are shown in Figures 4.10-2b through 4.10-2d. Airport noise contours and safety zones in relation to the Climate Smart Village Areas are shown on Figures 4.10-8a and 4.10-8b. As detailed in Table 4.10-1, approximately 2.3 acres of the Climate Smart Village areas are located within the 60 CNEL noise contour for the Montgomery-Gibbs Executive Airport. As detailed in Table 4.10-2, approximately 626 acres of the Climate Smart Village Areas are located within airport safety zone 6. As detailed in the ALUCP for Montgomery-Gibbs Executive Airport, in Safety Zone 6, new residential development is "compatible" and there are no limits on the intensity of people per acre within this zone (SDCRAA 2010b).

The Montgomery Field ALUCP contains the following noise compatibility policies regarding future development associated with the project.

- a) Policy 3.3.1: Evaluating Acceptable Noise Levels for New Development: The noise compatibility of proposed land use actions within the AIA of the Airport shall be evaluated in accordance with the policies set forth in the ALUCP.
- b) Policy 3.3.2: Measures of Noise Compatibility: The criteria in the ALUCP indicate the maximum acceptable airport-related noise levels, measured in terms of CNEL, for residential and a range of nonresidential land uses. Factors considered in setting the criteria include the following:
  - Established federal and state regulations and guidelines.
  - The ambient noise levels in the community. Ambient noise levels influence the potential intrusiveness of aircraft noise upon a particular land use and vary greatly between rural, suburban, and urban communities. For the purposes of this Compatibility Plan, the Airport vicinity is considered an urban community.
  - The extent to which noise would intrude upon and interrupt the activity associated with a particular use.
  - The extent to which the activity itself generates noise.
  - The extent of outdoor activity associated with a particular land use.
- d) Policy 3.3.3: Acceptable Noise Levels for Specific Types of Land Use Actions:
  - The threshold for evaluation is the projected 60 dB CNEL contour. This contour defines the noise impact area of the Airport. All land uses located outside this noise contour are consistent with the noise compatibility policies.
  - The maximum airport-related noise level considered compatible for new residential development in the environs of the Airport is 65 dB CNEL.

- e) Policy 3.3.4: Application of Noise Contours to Individual Project Sites to Determine Compatibility: Projected noise contours are inherently imprecise because, especially at general aviation airports, flight paths and other factors that influence noise emissions are variable and activity projections are always uncertain. Given this imprecision, noise contours shall be utilized, as follows, in assessing the compatibility of a proposed use at a specific development site.
- In general, the highest CNEL to which a project site is anticipated to be exposed shall be used in evaluating the compatibility of development over the entire site.
  - An exception to this policy is where no part of the building(s) or residential unit(s) proposed on the site fall within the higher CNEL range; the criteria for the CNEL range where the buildings are located shall apply.

### ***NOLF Imperial Beach ALUCP***

The NOLF Imperial Beach ALUCP was adopted on October 15, 2015. As required by State law, this ALUCP is consistent with the safety and noise standards in the AICUZ Update prepared by the U.S. Department of Defense, Naval Facilities Command Southwest for NOLF Imperial Beach. The primary goal of the U.S. ~~United States~~ Department of Defense AICUZ Program is to protect the health, safety, and welfare of those living on and near a military airfield while preserving the operational capability of the airfield. Each compatibility factor is included in the AIA maps of the ALUCP included as Exhibits 1-1, 2-1, 3-1, 4-1, and 5-1. The complete boundaries that comprise the airport's AIA are shown in Figure 4.10-2a. As shown, portions of the Climate Smart Village Areas are located within the NOLF Imperial Beach AIA Review Area 2. As shown in Figures 4.10-9a and 4.10-9b, none of the NOLF Imperial Beach ALUCP airport noise contours or safety zones intersect with the project areas (SDCRAA 2015).

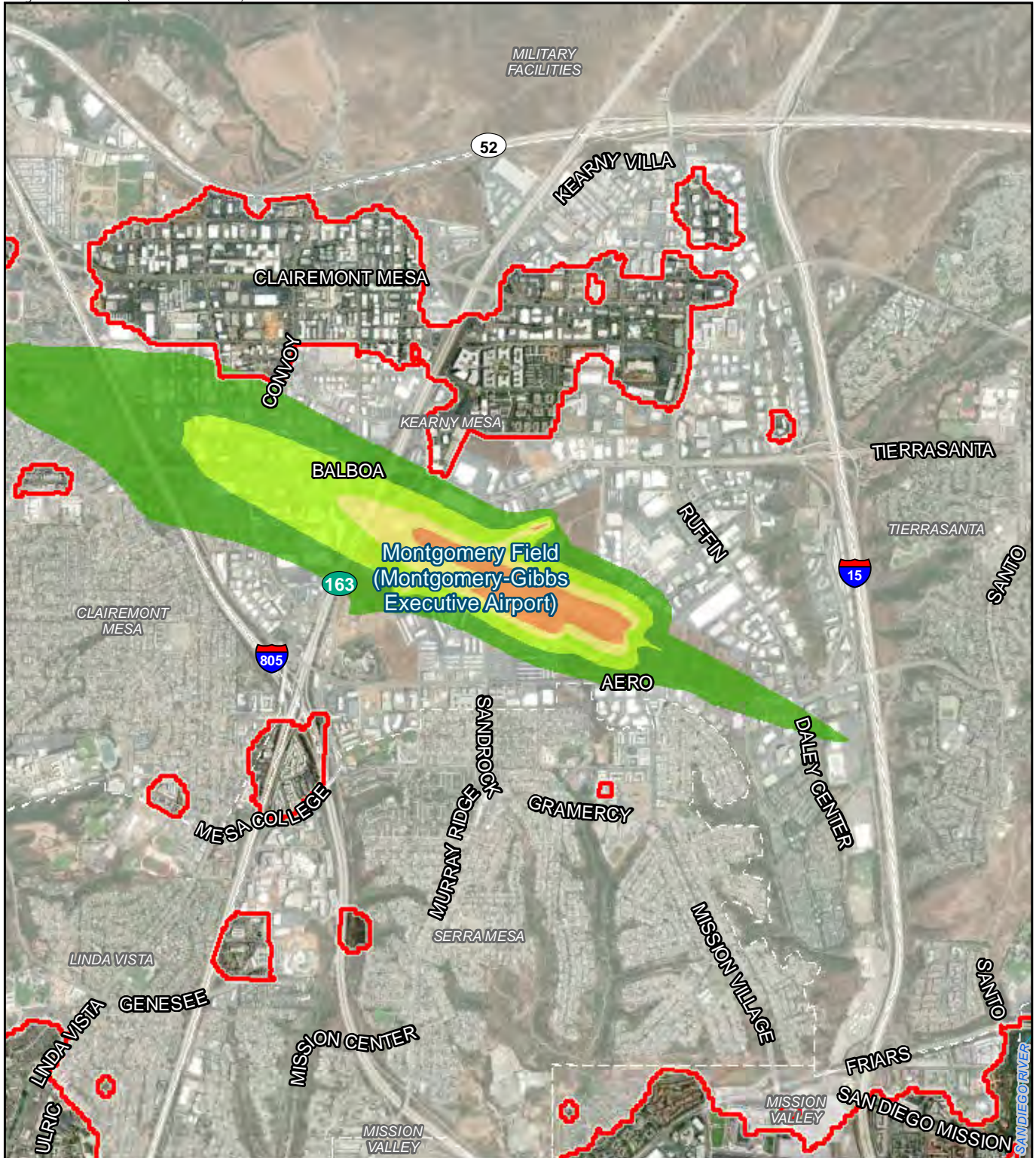
The NOLF Imperial Beach Airport ALUCP contains the following noise compatibility policies regarding future development associated with the project.

- a) Policy N.2: Sound Attenuation: Conditionally compatible land uses must incorporate sound attenuation to achieve noise levels as specified in Table 2-1 in the ALUCP.
- b) Policy N.3: Evaluation of Noise Compatibility for Development with a Mix of Uses: When a land use project involves a combination of different land uses listed in Table 2-1 in the ALUCP, each component use must comply with the applicable noise standards.

### **c. City of San Diego General Plan**

The citywide General Plan was adopted on March 10, 2008, and is the City's long-range vision and guide for future development. The City's growth strategy is referred to as the City of Villages and relies on infill development to accommodate growth while acknowledging the character of its communities, natural resources, and amenities. The General Plan provides the overall structure to guide CPUs and amendments, as well as the implementation of an action plan.



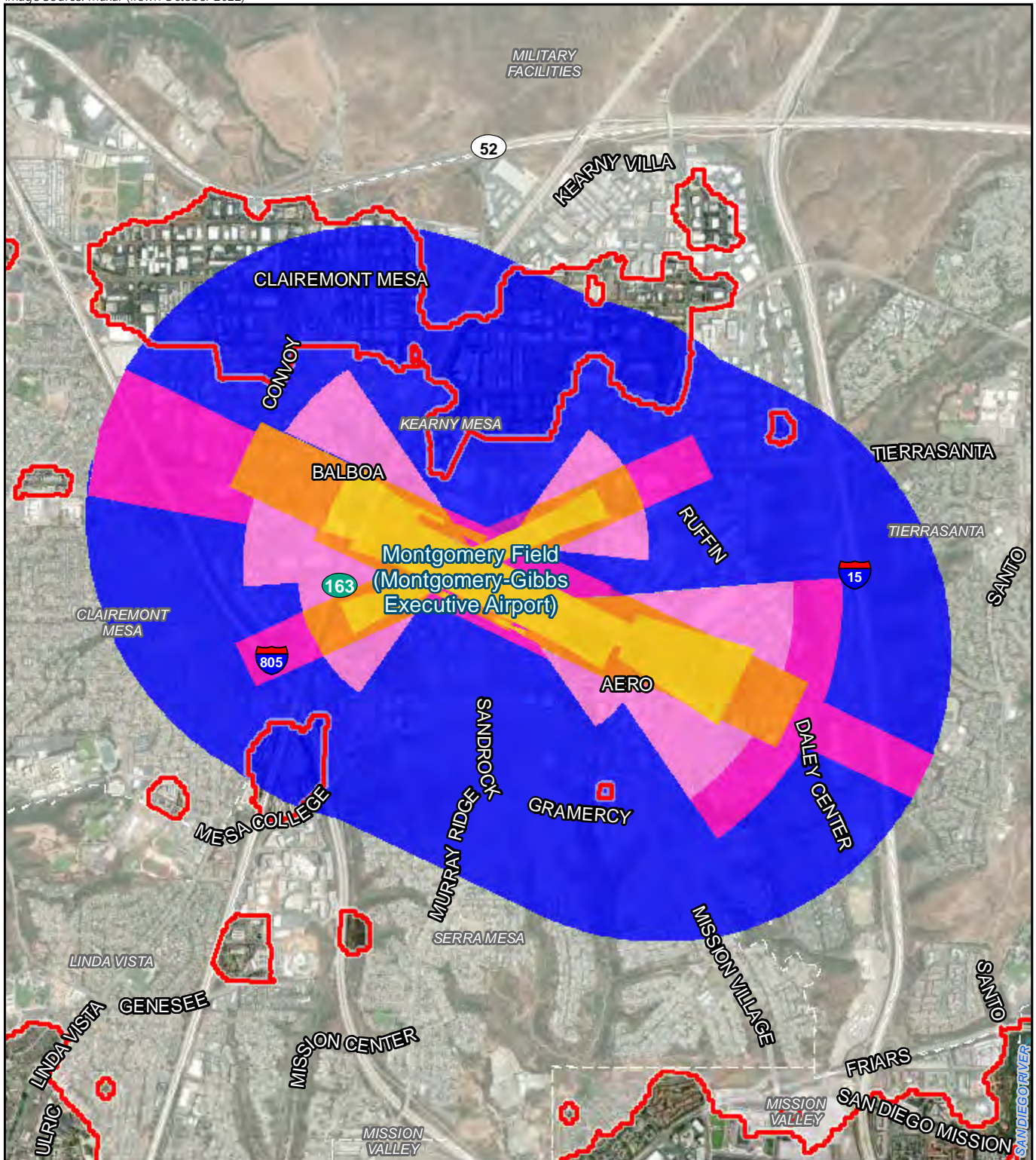


- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- ALUCP Noise**
- 60 CNEL
- 65 CNEL
- 70 CNEL
- 75 CNEL



FIGURE 4.10-8a  
Montgomery Field Airport Noise Contours





Blueprint SD Initiative Climate Smart Village Areas  
 San Diego City Limits

**Airport Safety**

- Zone 1
- Zone 2
- Zone 3
- Zone 4
- Zone 5
- Zone 6

0 Feet 3,000 ↑

**FIGURE 4.10-8b**  
 Montgomery Field Airport Safety Zones

















-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
- Noise Level**
-  60 CNEL
-  65 CNEL
-  70 CNEL
-  75 CNEL



FIGURE 4.10-9a  
NOLF Imperial Beach Airport Noise Contours





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
- Airport Safety**
-  Accident Potential Zone 1
-  Clear Zone
-  Runway
-  Primary Surface

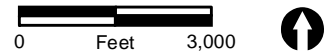


FIGURE 4.10-9b  
NOLF Imperial Beach Airport Safety Zones

Under the City of Villages strategy, the General Plan aims to direct new development projects away from natural undeveloped lands into already urbanized areas and/or areas where conditions allow the integration of housing, employment, civic, and transit uses, mirroring regional planning and smart growth principles. The City of Villages strategy intends to preserve remaining open space and natural habitat, and focus development in areas with available public infrastructure.

The General Plan includes 10 elements which provide guidance for future development and other City land use plans. These are listed here and discussed in more detail below: (1) Land Use and Community Planning Element; (2) Mobility Element; (3) Urban Design Element; (4) Economic Prosperity Element; (5) Public Facilities, Services, and Safety Element; (6) Recreation Element; (7) Conservation Element; (8) Noise Element; (9) Historic Preservation Element; and (10) Housing Element. The Housing Element is required to be consistent with the General Plan goals and City of Villages strategy and is required to be updated every eight years under state law. The last Housing Element update was in 2020 and revised in 2021 to incorporate updates required by the Department of Housing and Community Development. The Housing Element was certified by the Department of Housing and Community Development on September 10, 2021.

### ***Land Use and Community Planning Element***

The Land Use and Community Planning Element (Land Use Element) provides policies to guide the City's growth and implement the City of Villages strategy within the context of the City's community planning program. The City's General Plan does not designate land uses but guides the preparation of community plans (community-specific land use policy plans) and provides citywide land development goals and policies. The policy areas addressed in this Element include zoning and policy consistency, the plan amendment process, coastal planning, airport-land use compatibility planning, annexation policies, balanced communities, equitable development, and environmental justice.

The Land Use Element acknowledges that as the majority of the City is developed, infill development and redevelopment will play an increasingly significant role in providing needed housing, and guidance for infill development and redevelopment as provided by the City of Villages strategy. The City of Villages strategy calls for growth to be focused into mixed-use activity centers that are pedestrian-friendly, serve as the center of the community, and are linked to the regional transit system. The Land Use Element states that implementation of the City of Villages strategy is an important component of the City's strategy to reduce citywide GHG emissions, because the strategy makes it possible for larger numbers of people to make fewer and shorter vehicle trips, resulting in reduced vehicle miles traveled (VMT). Identified types of village areas include Downtown San Diego, Subregional Employment Areas, Urban Village Centers, Community and Neighborhood Village Centers, and Transit Corridors, all of which are defined to have transit connections and to support transit ridership. Figure LU-1 in the Land Use and Community Planning Element maps "village propensity" within the City, based on existing and community plan-designated land uses, community-plan identified capacity for growth, existing public facilities, or an identified funding source for facilities, existing or an identified funding source for transit service, community character, and environmental constraints.

The Land Use Element includes the following policy relating to airport land use compatibility: LU-G.6: Require that all proposed development projects (ministerial and discretionary actions) notify the FAA

in areas where the proposed development meets the notification criteria as defined by Code of Federal Regulation Title 14, Part 77.

### ***Mobility Element***

The Mobility Element contains policies that seek to promote a balanced, multi-modal transportation network while minimizing environmental and neighborhood impacts. In addition to addressing walking/rolling, streets, and transit, the Mobility Element also includes policies related to regional collaboration, bicycling, parking, the movement of goods, and other components of the transportation system.

### ***Urban Design Element***

The Urban Design Element implements “core values” related to urban form, including: the natural environment; the City’s extraordinary setting, defined by its open spaces, natural habitat, and unique topography; a compact, efficient, and environmentally sensitive pattern of development; and the physical, social, and cultural diversity of the City and its neighborhoods. The principles of the urban design strategy are to contribute to the qualities that distinguish San Diego as a unique living environment, enhancing the City’s existing communities, direct growth into transit-oriented mixed-use and commercial areas where a high level of activity already exists or can potentially be realized, create a sense of place, where community members can enjoy time outside their homes and jobs with each other. The policies in the Urban Design Element are aimed at respecting the natural environment, preserving open space systems, and targeting new growth into compact villages.

### ***Economic Prosperity Element***

The Economic Prosperity Element contains policies intended to ensure that the economy grows in ways that strengthens San Diego industries and creates jobs with self-sufficient wages, increases average income, and stimulates economic investment in the community. As stated in the Economic Prosperity Element, “The achievement of economic prosperity goals also relies on policies in the Land Use and Community Planning Element to appropriately designate land for economic development, the Housing Element to provide workforce housing accessible to employment areas, the Mobility Element to provide a critical link between housing and jobs, and the Public Facilities, Services and Safety Element to address the provision of regional facilities needed to reinforce the viability of our industrial areas.”

### ***Public Facilities, Services, and Safety Element***

The Public Facilities, Services, and Safety (Public Facilities) Element is intended to plan for adequate public facilities and services through policies that address public financing strategies, public and developer financing responsibilities, and prioritizing infrastructure and public spaces in areas with the greatest need. Policies in the Public Facilities Element also apply to fire-rescue, police, wastewater collection and treatment, stormwater infrastructure, water supply and distribution, waste management, libraries, schools, public utilities, and disaster preparedness.

***Recreation Element***

The goals and policies of the Recreation Element build on the City's natural environment and resources and existing recreational facilities and services, to help achieve an equitable balance of recreational resources, address historic disinvestment in areas with the greatest need due to racist and other exclusionary planning policies and development patterns, and to adapt to future recreation needs. The Recreation Element policies address the challenge of meeting the community's park and recreational needs; the inequitable distribution of parks citywide, especially in older, developed communities, in areas with the greatest need; and the need to achieve a sustainable, accessible, and diverse park and recreation system. Refer to Section 4.13.2.2b for a discussion of the Parks Master Plan.

***Conservation Element***

The Conservation Element's goals and policies guide the conservation of resources that are fundamental components of San Diego's environment, that help define the City's identity, and that are relied upon for continued economic prosperity. Resources addressed in the Conservation Element include, but are not limited to, water, land, air, biodiversity, minerals, natural materials, recyclables, topography, viewsheds, and energy.

***Noise Element***

The intent of the Noise Element is to minimize excessive noise effects and improve the quality of life of people working and living in the City. The Noise Element identifies goals and related policies with regards to noise and land use compatibility, motor vehicle traffic noise, and trolley and train noise.

The Noise Element (City of San Diego 2015) provides goals and policies to guide compatible land uses, and the incorporation of noise attenuation measures for new uses to protect people living and working in the City from exposure to excessive noise. To evaluate noise compatibility, the Noise Element establishes noise compatibility guidelines for uses affected by traffic noise, as detailed in Table 4.10-2. As shown in Table 4.10-2, the "compatible" noise level for noise sensitive receptors, such as single- and multi-family residential, is 60 CNEL. Compatibility indicates that standard construction methods would attenuate exterior noise to an acceptable indoor noise level and people can carry out outdoor activities with minimal noise interference.

Exterior noise levels ranging between 65 and 70 CNEL are considered "conditionally compatible" for multiple units, mixed-use commercial/residential, live work, and group living accommodations. The Noise Element (Section B, Motor Vehicle Traffic Noise) also states that although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses up to 75 dB(A) CNEL in areas affected primarily by motor vehicle traffic noise with existing residential uses, as long as any future residential use above the 70 dB(A) CNEL includes noise attenuation measures to ensure an interior noise level of 45 dB(A) CNEL and is located in an area where a community plan allows multi-family and mixed-use residential uses.

Park uses are considered compatible in areas up to 70 dB(A) CNEL and conditionally compatible in areas between 70 and 75 dB(A) CNEL.



***Interior Noise***

Noise-sensitive residential/habitable interior spaces are required to have an interior noise level no greater than 45 CNEL pursuant to the California Noise Insulation Standards of the California Building Code (CBC). Proposed new construction and major renovations must demonstrate compliance with the current interior noise standards through submission and approval of a Title 24 Compliance Report. Per the General Plan Land Use - Noise Compatibility Guidelines, building structures that contain retail sales and/or commercial services must attenuate exterior noise to achieve an interior noise level of 50 CNEL for occupied areas. Standard construction techniques would provide a 20-25 dB reduction of exterior noise levels to an interior receiver assuming windows remain closed (Federal Highway Administration 2011). Given this reduction, standard building construction would result in interior noise levels of 40 dB CNEL or less when exterior noise sources are 60 dB(A) CNEL or less.

***Applicable Noise Element Policies***

The General Plan contains policies applicable to the project which are intended to prevent and mitigate adverse impacts of excessive noise including, but not limited to, the following:

***Land Use***

- NE-A.1: Separate excessive noise-generating uses from residential and other noise-sensitive land uses with a sufficient spatial buffer of less sensitive uses.
- NE-A.2: Assure the appropriateness of proposed developments relative to existing and future noise levels by consulting the guidelines for noise-compatible use (shown on Table NE-3) to minimize the effects on noise-sensitive land uses.
- NE-A.3: Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.
- NE-A.4: Require an acoustical study consistent with Acoustical Study Guidelines (Table NE-4) for proposed developments in areas where the existing or future noise level exceeds or would exceed the “compatible” noise level thresholds as indicated on the Land Use – Noise Compatibility Guidelines (Table NE-3 of the General Plan; Table 4.10-4 below), so that noise mitigation measures can be included in the proposed project design to meet those noise guidelines.
- NE-A.5: Prepare noise studies to address existing and future noise levels from noise sources that are specific to a community when updating community plans.
- NE-A.6: Consider the new construction projects for land uses indicated as incompatible if noise mitigation measures are included in the project that would make the indoor noise environment acceptable.

Table 4.10-4 City of San Diego Land Use – Noise Compatibility Guidelines					
Land Use Category		Exterior Noise Exposure (CNEL)			
		60	65	70	75
<i>Parks and Recreational</i>					
Parks, Active and Passive Recreation					
Outdoor Spectator Sports, Golf Courses; Water Recreational Facilities; Indoor Recreation Facilities					
<i>Agricultural</i>					
Crop Raising and Farming; Community Gardens, Aquaculture, Dairies; Horticulture Nurseries and Greenhouses; Animal Raising, Maintaining and Keeping; Commercial Stables					
<i>Residential</i>					
Single Dwelling Units; Mobile Homes			45		
Multiple Dwelling Units <i>*For uses affected by aircraft noise, refer to Policies NE-D.2. &amp; NE-D.3.</i>			45	45	
<i>Institutional</i>					
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12 Educational Facilities; Libraries; Museums; Child Care Facilities			45		
Other Educational Facilities including Vocational/Trade Schools and Colleges and Universities			45	45	
Cemeteries					
<i>Retail Sales</i>					
Building Supplies/Equipment; Food, Beverage, and Groceries; Pets and Pet Supplies; Sundries, Pharmaceutical, and Convenience Sales; Wearing Apparel and Accessories				50	50
<i>Commercial Services</i>					
Building Services; Business Support; Eating and Drinking; Financial Institutions; Maintenance & Repair; Personal Services; Assembly and Entertainment (includes public and religious assembly); Radio and Television Studios; Golf Course Support				50	50
Visitor Accommodations			45	45	45
<i>Offices</i>					
Business and Professional; Government; Medical, Dental, and Health Practitioner; Regional and Corporate Headquarters				50	50
<i>Vehicle and Vehicular Equipment Sales and Services Use</i>					
Commercial or Personal Vehicle Repair and Maintenance; Commercial or Personal Vehicle Sales and Rentals; Vehicle Equipment and Supplies Sales and Rentals; Vehicle Parking					
<i>Wholesale, Distribution, Storage Use Category</i>					
Equipment and Materials Storage Yards; Moving and Storage Facilities; Warehouse; Wholesale Distribution					
<i>Industrial</i>					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking and Transportation Terminals; Mining and Extractive Industries					
Research and Development					50
	<b>Compatible</b>	<b>Indoor Uses</b>	Standard construction methods should attenuate exterior noise to an acceptable indoor noise level.		
		<b>Outdoor Uses</b>	Activities associated with the land use may be carried out.		
45, 50	<b>Conditionally Compatible</b>	<b>Indoor Uses</b>	Building structure must attenuate exterior noise to the indoor noise level indicated by the number for occupied areas.		
		<b>Outdoor Uses</b>	Feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.		
	<b>Incompatible</b>	<b>Indoor Uses</b>	New construction should not be undertaken.		
		<b>Outdoor Uses</b>	Severe noise interference makes outdoor activities unacceptable.		

SOURCE: City of San Diego 2015.

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### *Motor Vehicle Traffic Noise*

- NE-B.1: Encourage noise-compatible land uses and site planning adjoining existing and future highways and freeways.
- NE-B.3: Require noise reducing site design, and/or traffic control measures for new development in areas of high noise to ensure that the mitigated levels meet acceptable decibel limits.
- NE-B.4: Require new development to provide facilities which support the use of alternative transportation modes such as walking, bicycling, carpooling and, where applicable, transit to reduce peak-hour traffic.
- NE-B.5: Designate local truck routes to reduce truck traffic in noise-sensitive land uses areas.
- NE-B.7: Promote the use of berms, landscaping, setbacks, and architectural design where appropriate and effective, rather than conventional wall barriers to enhance aesthetics.
- NE-B.9: When parks are located in noisier areas, seek to reduce exposure through site planning, including locating the most noise sensitive uses, such as children's play areas and picnic tables, in the quieter areas of the site; and in accordance with the other policies of this section.
- NE-B.10: For future multi-home residential uses located in areas above 70 dB(A) CNEL affected primarily by motor vehicle traffic noise, ensure the following:
  - Limit the amount of outdoor areas subject to exposure above the 70 dB(A) CNEL; and
  - Provide noise attenuation to ensure an interior noise level that does not exceed 45 dB(A) CNEL.

### *Trolley and Train Noise*

- NE-C.1: Use site planning to help minimize exposure of noise sensitive uses to rail corridor and trolley line noise.
- NE-C.2: Work with SANDAG, Caltrans, Metropolitan Transit System, California High-Speed Rail Authority, and passenger and freight rail operators to install noise attenuation features to minimize impacts to adjacent residential or other noise sensitive uses. Such features include rail and wheel maintenance, grade separation along existing and future rail corridors, and other means.
- NE-C.4: Work with SANDAG, Caltrans, Metropolitan Transit System, and passenger and freight rail operators to install grade separation at existing roadway-rail grade crossings as a noise and safety measure.

### *Aircraft Noise*

- NE-D.1: Encourage noise-compatible land use within AIAs in accordance with federal and state noise standards and guidelines.
- NE-D.2: Limit future residential uses within airport influence areas to the 65 dB(A) CNEL airport noise contour, except for multiple-home, mixed-use, and live work residential uses within the SDIA influence area in areas with existing residential uses and where a community plan and the ALUCP allow future residential uses.
- NE-D.3: Ensure that future multiple-home, mixed-use, and live work residential uses within the SDIA influence area that are located greater than the 65 dB(A) CNEL airport noise

contour are located in areas with existing residential uses and where a community plan and ALUP allow future residential uses.

- Limit the amount of outdoor areas subject to exposure above the 65 dB(A) CNEL; and;
- Provide noise attenuation to ensure an interior noise level that does not exceed 45 dB(A) CNEL.
- NE-D.4: Discourage outdoor uses in areas where people could be exposed to prolonged periods of high aircraft noise levels greater than the 65 dB(A) CNEL airport noise contour.
- NE-D.7: Limit future uses within airport influences areas when the noise policies in the compatibility plans are more restrictive for uses affected by aircraft noise than shown on Table NE-3 of the General Plan.

#### *Commercial and Mixed-Use Activity Noise*

- NE-E.1: Encourage the design and construction of commercial and mixed-use structures with noise attenuation methods to minimize excessive noise to residential and other noise-sensitive land uses.
- NE-E.2: Encourage mixed-use developments to locate loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noisier components away from the residential component of the development.
- NE-E.3: Encourage daytime truck deliveries to commercial uses abutting residential uses and other noise-sensitive land uses to minimize excessive nighttime noise unless there is no feasible alternative or there are overriding transportation benefits by scheduling deliveries at other hours.
- NE-E.5: Implement night and daytime on-site noise level limits to address noise generated by commercial uses where it affects abutting residential and other noise-sensitive uses.

### ***Historic Preservation Element***

The Historic Preservation Element guides the preservation, protection, restoration, and rehabilitation of historical and cultural resources. It provides goals and policies related to the identification and preservation of historical resources; as well as historic preservation education, benefits, and incentives.

### ***Housing Element***

The 2021-2029 Housing Element of the General Plan is intended to plan for adequate housing to serve San Diegans of every economic level and demographic group. It provides goals, objectives and programs related to accommodating the City's diverse housing needs; preserving and conserving at-risk housing; facilitating residential development; affordable housing opportunities and sustainable development.

## **d. Community Plans**

Community plans are community-specific land use policy plans that are consistent with the City's General Plan. The City's community planning program is the mechanism to refine the General Plan's citywide policies; designate land uses; identify needed public facilities, mobility and utility

infrastructure, and recreation facilities; and make additional as-needed community-specific recommendations. In addition to the University CPU and Hillcrest FPA, the project areas encompass multiple community planning areas, each with its own community plan. Many of the City's community plans that were updated after the adoption of the 2008 General Plan include goals, land use maps and policies that target residential and non-residential growth, and increased residential density to be located within close proximity to existing and planned transit, in order to create village cores with improved pedestrian and multi-modal circulation. Other community plans that were adopted prior to the 2008 General Plan reflect the guidance of previous General Plans; nevertheless, General Plan Figure LU-1: Village Propensity Map (see Figure 2-2), currently identifies village opportunities across the City and incorporates the 2050 regional transportation network.

### **e. Climate Action Plan**

The CAP is the City's policy commitment that sets clear goals and strategies to reduce GHG emissions and outlines federal, regional, and local actions to achieve them. Strategic land use planning is critical to reducing citywide vehicle emissions that result from vehicular travel, the single largest source of GHG emissions. As such, the City is developing a land use strategy and complementary policies to support GHG emissions reductions, including an amendment to the City's General Plan (Blueprint SD Initiative) with a focus on higher density and intensity land uses around transit and job centers to guide future growth. The City updated the SDMC to include zero parking minimums and unbundled parking requirements citywide within Transit Priority Areas (TPAs). The SDMC amendments require transportation amenities, such as on-site bicycle or micromobility fleets, secure storage for grocery deliveries, on-site shuttle services, or other amenities to support a reduced reliance on cars. In 2021, the City adopted a complementary SDMC update for non-residential uses within existing or near-term future TPAs to create flexibility for businesses to provide parking to meet the demand and incentivize more transportation demand management programs by employers.

### **f. San Diego Municipal Code Regulations**

Chapters 11 through 15 of the SDMC are referred to as the LDC as they regulate how land can be subdivided and developed, the form that development can take, and the land uses that are permitted in various parts of the City. The LDC implements the policies in the General Plan and the land use designations and policies in community plans. The LDC contains citywide base zones that specify permitted land uses, residential density, floor area ratio, and other development requirements for given zoning classifications; planned district regulations that provide community-specific zoning and development regulations; as well as overlay zones and supplemental regulations that provide additional development requirements. The SDMC also provides for other affordable housing density bonuses in order to achieve the goals of the General Plan. The City's HRR (SDMC Chapter 14, Article 3, Division 2) are part of the LDC and are further detailed in Section 4.4 of this [Program Environmental Impact Report \(PEIR\)](#).

#### ***Environmentally Sensitive Lands Regulations***

The LDC includes the City's ESL Regulations. The purpose of the ESL Regulations is to protect, preserve, and, where damaged, restore the environmentally sensitive lands of the City of San Diego

and the viability of the species supported by those lands (SDMC Chapter 14, Article 3, Division 1). These regulations are intended to assure that development occurs in a manner that protects the overall quality of the resources and the natural and topographic character of the area, encourages a sensitive form of development, retains biodiversity and interconnected habitats, maximizes physical and visual public access to and along the shoreline, and reduces hazards due to flooding in specific areas while minimizing the need for construction of flood control facilities. These regulations are intended to protect public health, safety, and welfare while employing regulations that are consistent with sound resource conservation principles and the rights of private property owners. ESL includes sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and special flood hazard areas (SDMC Chapter 14, Article 3, Division 1). Under existing regulations, development on premises where ESL is present would require a Site Development Permit in accordance with Section 126.0502 of the SDMC and would therefore be processed as a discretionary action.

### ***Affordable Housing Regulations***

Consistent with State Density Bonus Law, the City has adopted Affordable housing regulations (SDMC Chapter 14, Article 3, Division 7) to provide incentives for development that provides housing for very low income, low income, moderate income, or senior households, or lower income students, transitional foster youth, disabled veterans, or homeless persons. The regulations specify how compliance with California Government Code Section 65915 through 65918 (State Density Bonus Law) will be implemented and are intended to assist in providing adequate and affordable housing for all economic segments of the community and to provide a balance of housing opportunities throughout the City. As a result of density bonus allowances as implemented through the SDMC Affordable Housing Regulations, development throughout the City may qualify for waivers and/or incentives that allow for deviations to City development regulations such as increases in allowable height and/or floor area ratios, which can result in development allowances in excess of City base zone regulations. It is intended that the affordable housing density bonus, and any additional development incentive, be available for use in all residential development of five or more units, using criteria and standards provided in the General Plan and applicable Community Plans. All requests are required to be processed by the City and implemented by the San Diego Housing Commission.

### ***Airport Land Use Compatibility Overlay Zone***

The SDMC addresses issues related to safety compatibility in the Airport Land Use Compatibility Overlay Zone. SDMC Chapter 13, Article 2, Division 15 establishes the Airport Land Use Compatibility Overlay Zone, which ensures that new development located within an AIA for San Diego International Airport, MCAS Miramar, Montgomery-Gibbs Executive Airport, Brown Field, and Gillespie Airport, Naval Outlying Landing Field Imperial Beach, and NAS North Island is compatible with respect to airport-related noise, public safety, airspace protection, and aircraft overflight areas. Regulations include safety compatibility and aircraft overflight notification.

### ***Sustainable Development Area***

According to SDMC Chapter 11, Article 3, Division 1. Chapter 27, a Sustainable Development Area (SDA) means the area within a defined walking distance along a pedestrian path of travel from a



major transit stop that is existing or planned, if the planned major transit stop is included in a transportation improvement program or applicable regional transportation plan, as follows:

- (a) Within Mobility Zones 1 and 3, as defined in Section 143.1103, the defined walking distance is 1.0 mile.
- (b) Within Mobility Zone 4, as defined in Section 143.1103, the defined walking distance is .75 mile.
- (c) For parcels located in Mobility Zone 4, in an area identified as a High or Highest Resource California Tax Credit Allocation Committee (CTCAC) Opportunity Area, the defined walking distance is 1.0 mile.

In addition, an adopted specific plan prepared in accordance with Section 122.0107(a), shall be within the SDA, if the SDA is within a portion of the adopted specific plan.

## **g. Complete Communities**

Complete Communities is a planning initiative that focuses on planning strategies to integrate housing, mobility, parks, and infrastructure.

- **Housing Solutions:** Housing Solutions is an optional affordable housing incentive program aimed at encouraging the building of homes near high-frequency transit. The focus is intended to create a variety of housing options, particularly those at low- and middle-income levels.
- **Mobility Choices:** Mobility Choices aims to provide more mobility options to commute and recreate by streamlining development in areas of the City of San Diego that are most aligned with the City's climate goals and by investing in active transportation infrastructure, such as pedestrian and bicycle facilities. Specifically, the Mobility Choices Program ensures that new development mitigates transportation ~~VMT~~ vehicle miles traveled impacts to the extent feasible, while incentivizing development near transit. The Mobility Choices Program included amendments to the SDMC to adopt the Mobility Choices Regulations (Chapter 14, Article 3, Division 11 of the SDMC). Additionally, the Mobility Choices Program included adoption of a new California Environmental Quality Act (CEQA) significance threshold for transportation to implement SB 743.
- **Play Everywhere:** The City's adopted Parks Master Plan (2021) provides a framework to support the planning vision for a citywide interconnected park system which expands recreation facilities beyond traditional parks.
- **Build Better SD:** Build Better SD provides a modernized funding structure to enable faster and more efficient delivery of public facilities and infrastructure across all communities by consolidating funding, proposing structural and operational changes to the existing development impact fee program, and investing in neighborhood amenities that help implement long-range planning strategies and enhance opportunities.

## **h. Multiple Species Conservation Program**

The MSCP is a comprehensive habitat conservation planning program for southwestern San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity, while streamlining environmental permitting for development. Local jurisdictions, including the City, implement their portions of the MSCP through SAPs, which describe specific implementing mechanisms.

### ***Multiple Species Conservation Program Subarea Plan***

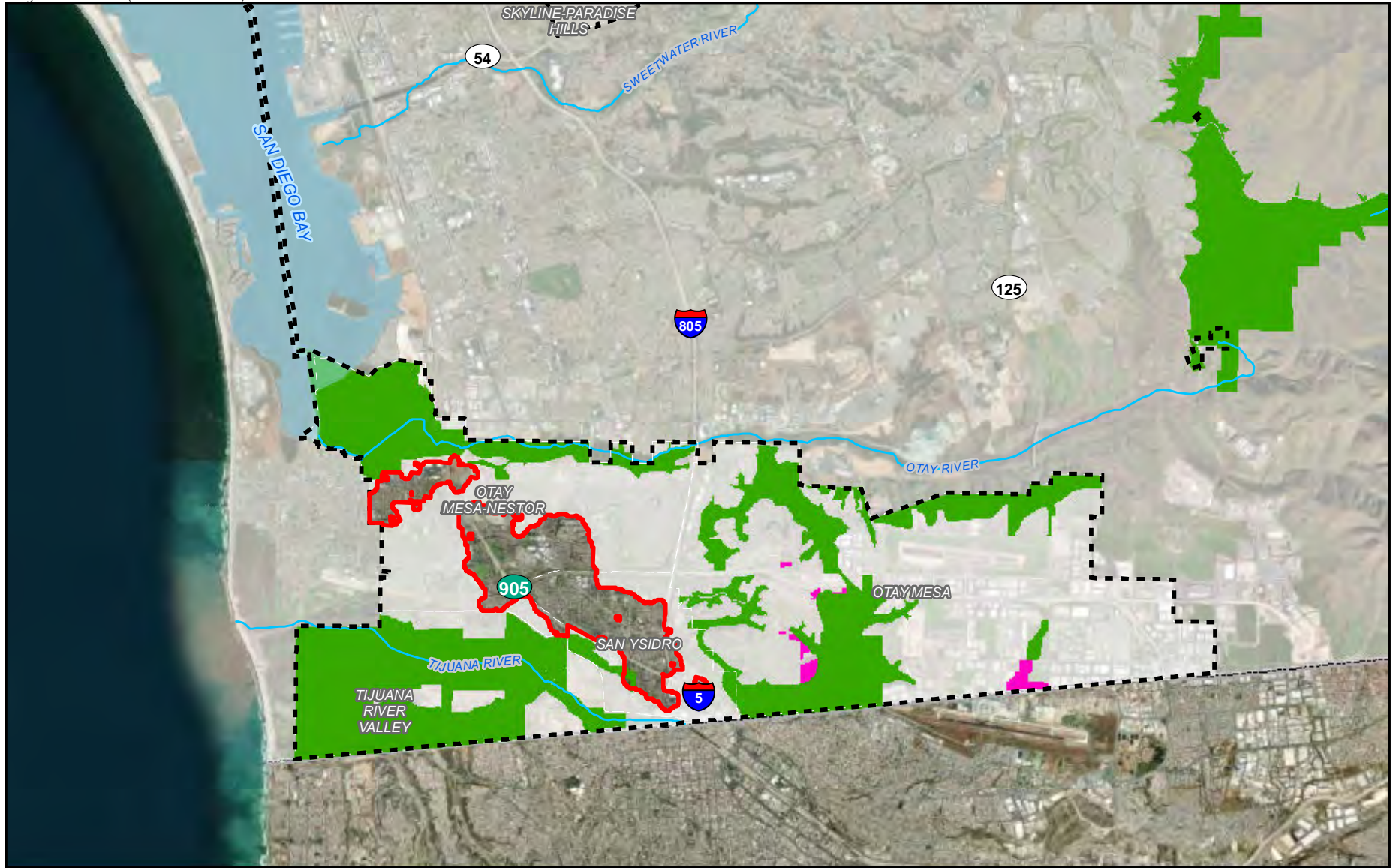
The MSCP is a comprehensive, long-term habitat conservation planning program that covers approximately 900 square miles in southwestern San Diego County under the federal and state Endangered Species Acts and state Natural Community Conservation Planning Act of 1991. Local jurisdictions, including the City, implement their portions of the regional umbrella MSCP through subarea plans (MSCP SAP), which describe specific implementing mechanisms. The City's MSCP SAP was approved in March 1997 and covers approximately 206,000 acres within the City's jurisdictional boundary. The primary goal of the MSCP SAP is to conserve viable populations of sensitive species to conserve regional biodiversity while allowing for reasonable economic growth. The City, U.S. Fish and Wildlife Service, and the California Department of Fish and Wildlife have signed an MSCP Implementing Agreement that allows the City to issue incidental take authorizations for "MSCP covered" species. The City's permit to take MSCP covered species is based on the concept that 90 percent of lands within the MHPA will be preserved. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

The City's Biology Guidelines and ESL regulations are the implementing ordinances for the MSCP SAP and VPHCP.

### ***Multi-Habitat Planning Area***

The MHPA is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. Input from responsible agencies and other interested participants resulted in the adoption of the City's MHPA in 1997. The City's MHPA areas are defined by "hard-line" limits, "with limited development permitted based on the development area allowance of the OR-1-2 zone [open space residential zone]." Portions of the MHPA in and around the project areas including the Climate Smart Village Areas, the Hillcrest FPA area and the University CPU area, respectively, are shown on Figure 4.10-10a through 4.10-10e, Figure 4.10-11 and Figure 4.10-12.

The MSCP Section 1.5 Framework Management Plan includes management priorities to be undertaken by the City as part of its MSCP implementation requirements. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit.



- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Baseline MHPA
- Vernal Pool Habitat Conservation Plan (VPHCP) Area

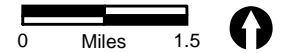
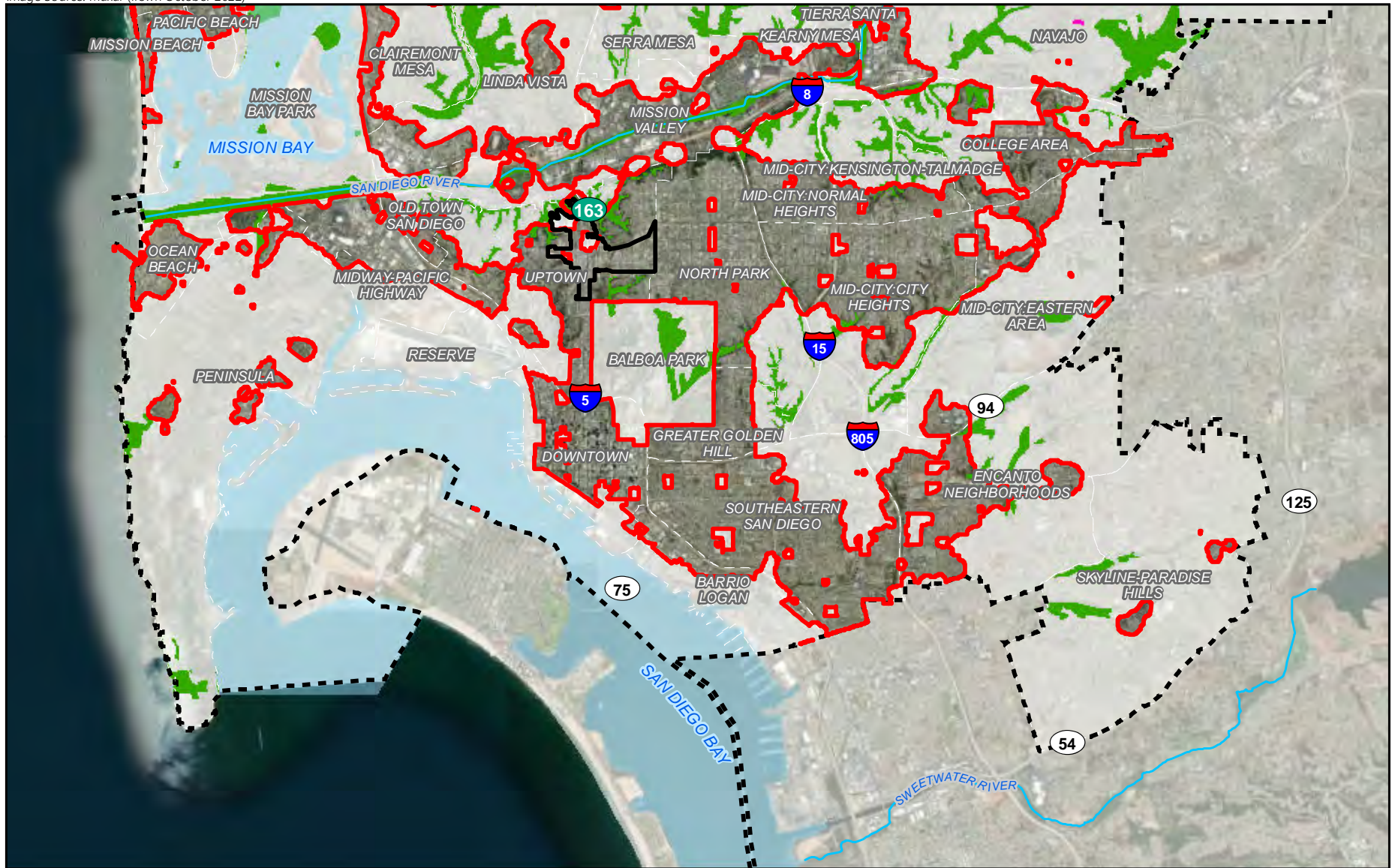







FIGURE 4.10-10a  
Multi-Habitat Planning Area (MHPA)  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South





-  Hillcrest Focused Plan Amendment Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Baseline MHPA
-  Vernal Pool Habitat Conservation Plan (VPHCP) Area

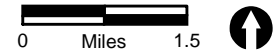
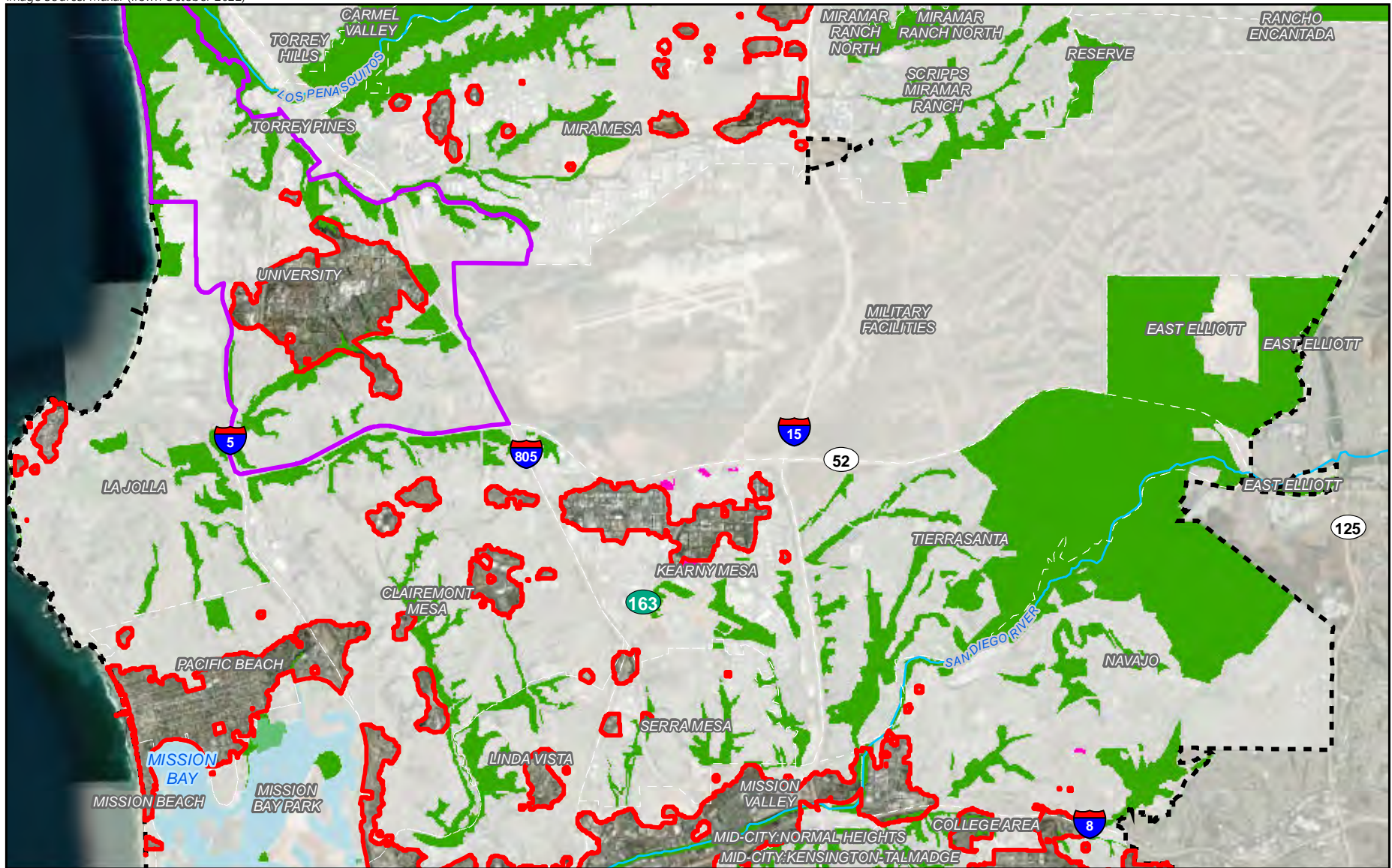







FIGURE 4.10-10b  
Multi-Habitat Planning Area (MHPA)  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - South Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Baseline MHPA
-  Vernal Pool Habitat Conservation Plan (VPHCP) Area

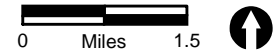
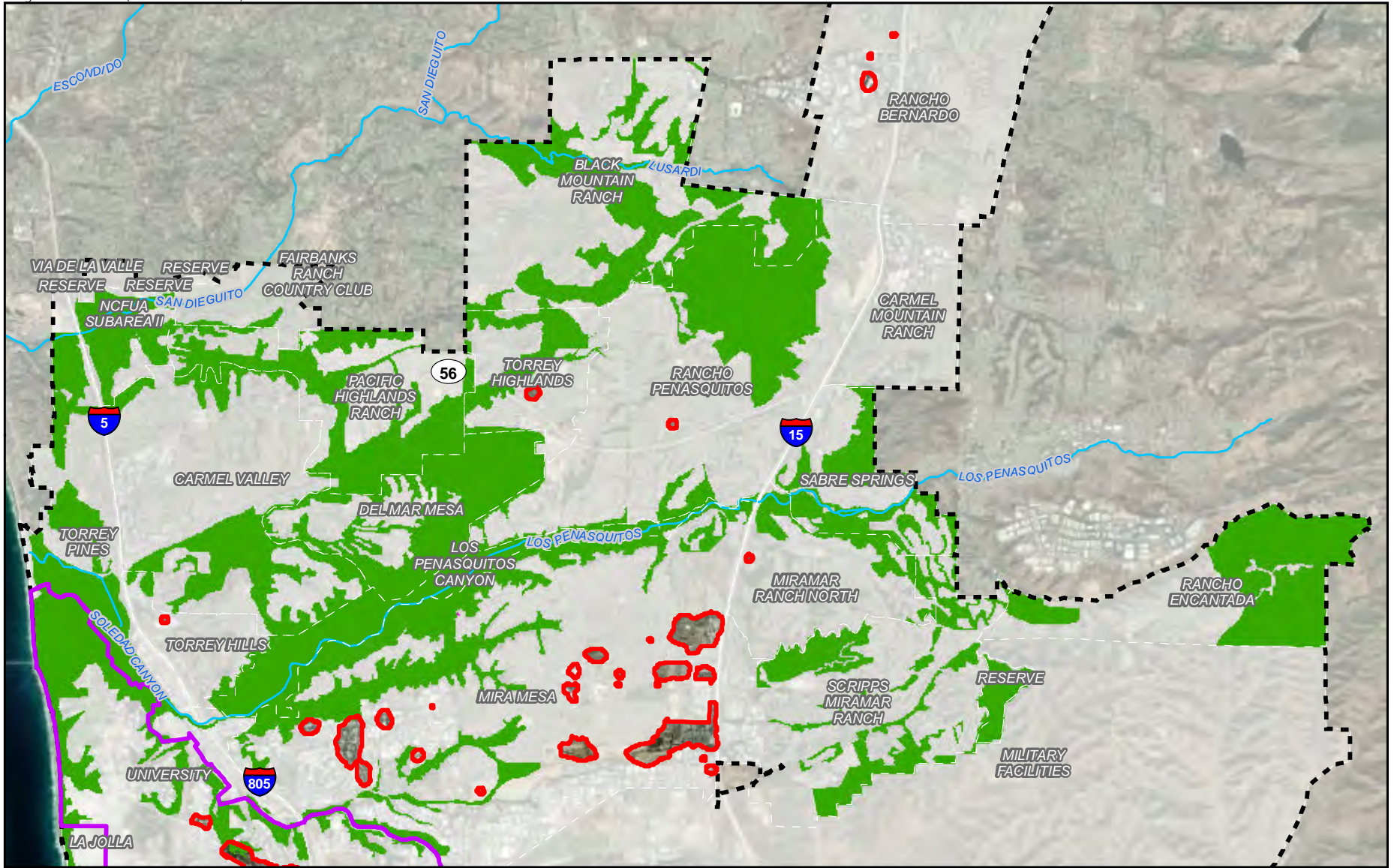







FIGURE 4.10-10c  
Multi-Habitat Planning Area (MHPA)  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Baseline MHPA
-  Vernal Pool Habitat Conservation Plan (VPHCP) Area

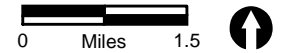
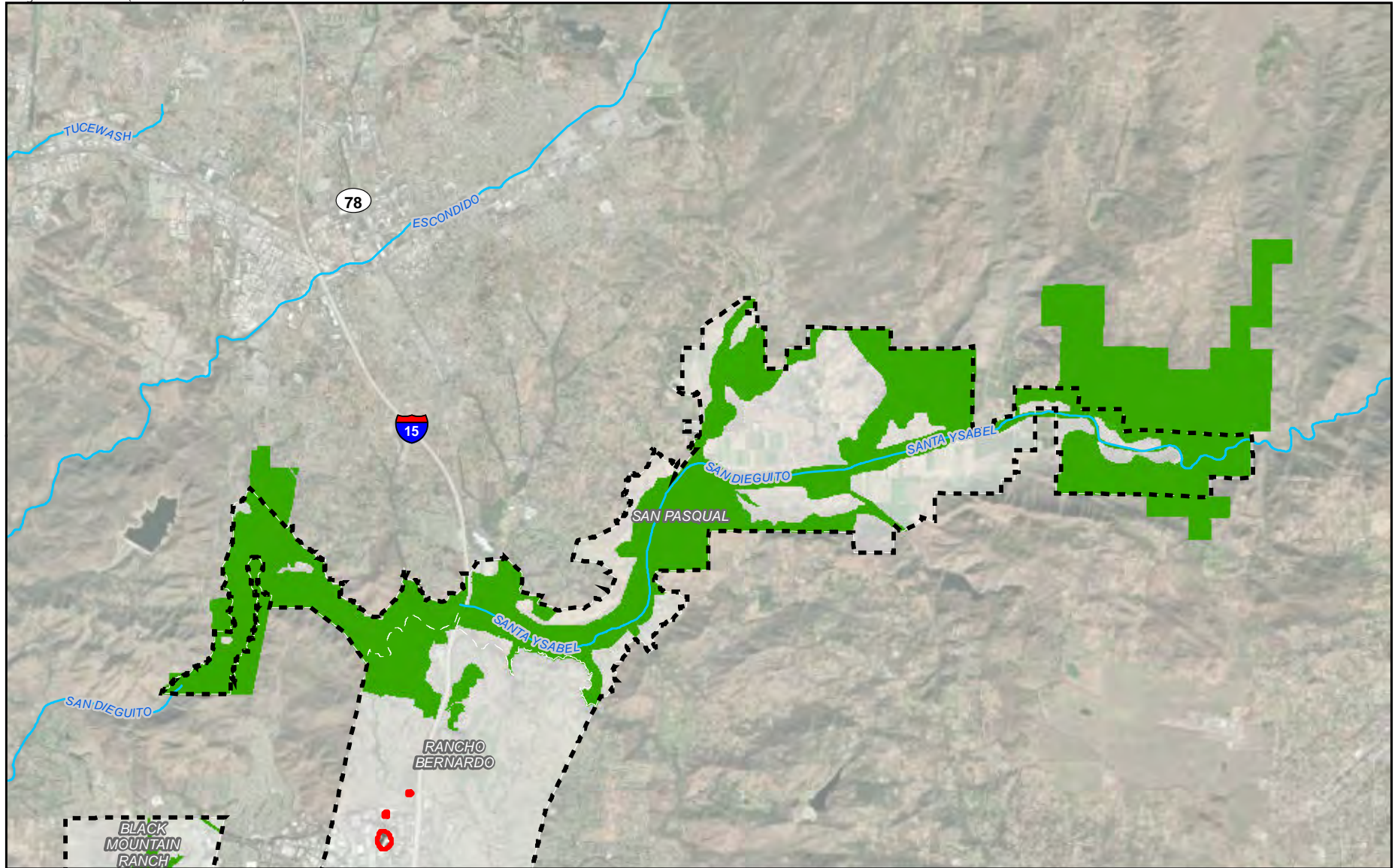





FIGURE 4.10-10d  
Multi-Habitat Planning Area (MHPA)  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - North





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Baseline MHPA

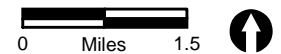
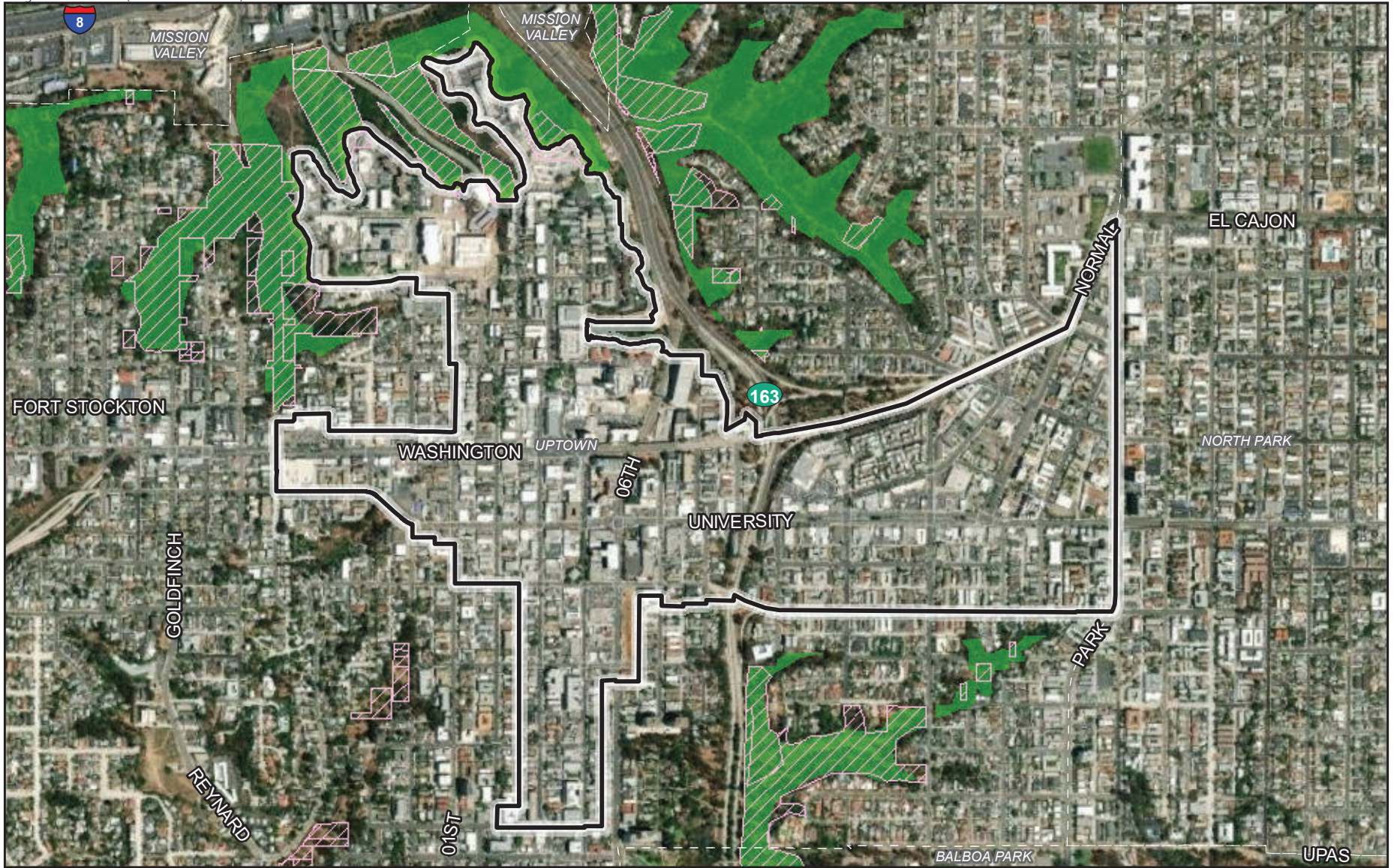


FIGURE 4.10-10e  
Multi-Habitat Planning Area (MHPA)  
in Relation to Blueprint SD Initiative  
Climate Smart Village Areas - Northeast








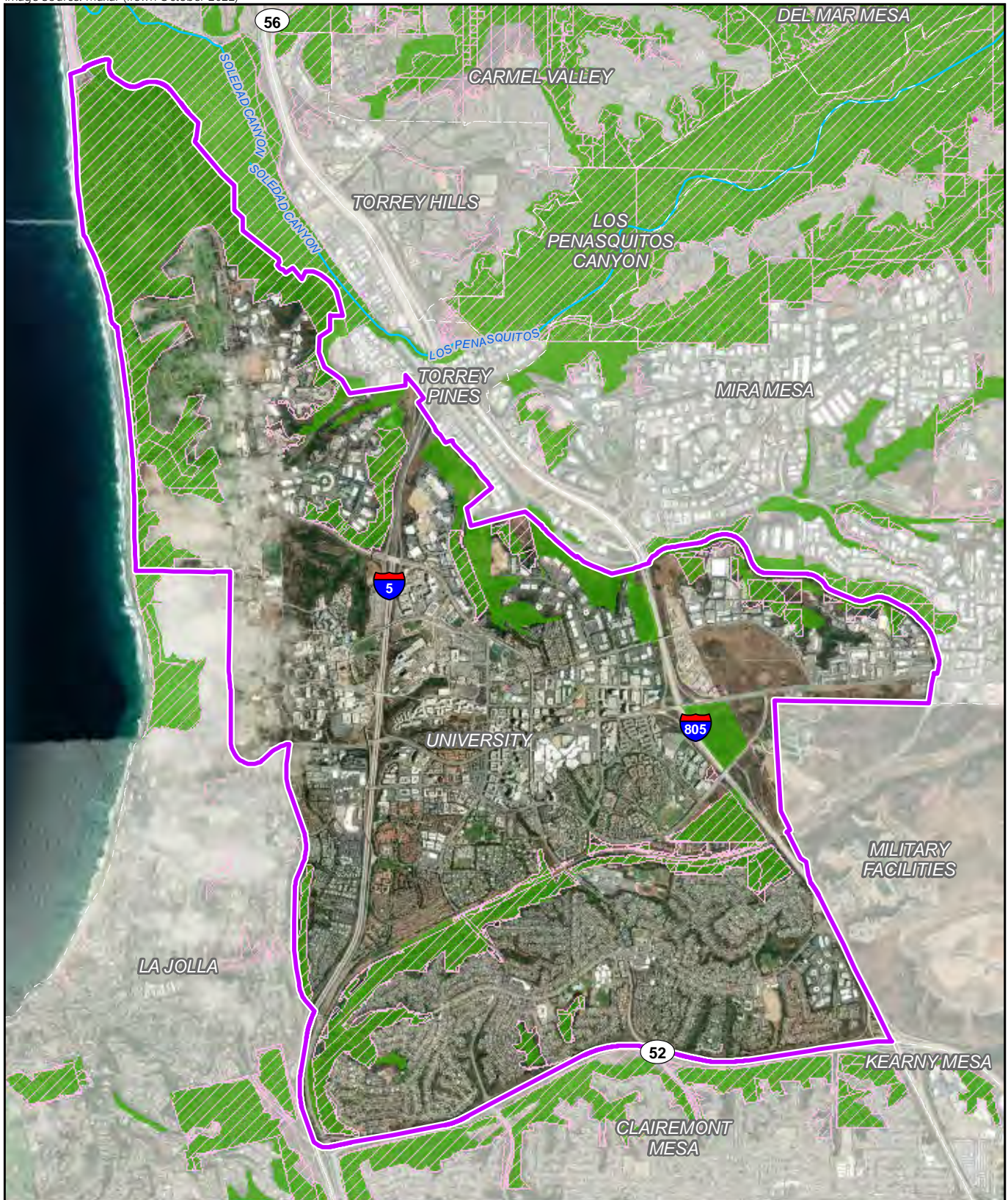




-  Hillcrest Focused Plan Amendment Area
-  Baseline MHPA
-  Conserved Lands



FIGURE 4.10-11  
Multi-Habitat Planning Area (MHPA) and Conserved Lands  
in Relation to Hillcrest Focused Plan Amendment Area





-  University Community Plan Update Area
-  Baseline MHPA
-  Vernal Pool Habitat Conservation Plan (VPHCP) Area
-  Conserved Lands


0 Feet 4,200 

FIGURE 4.10-12  
Multi-Habitat Planning Area (MHPA) and Conserved Lands  
in Relation to University Community Plan Update Area



### **Multi Habitat Planning Area Land Use Adjacency Guidelines**

The City's MSCP SAP provides Land Use Adjacency Guidelines to avoid or reduce significant indirect impacts to the MHPA from adjacent land uses. The MSCP establishes adjacency guidelines to be addressed on a project-by-project basis to minimize direct and indirect impacts and maintain the function of the MHPA. The Land Use Adjacency Guidelines would be incorporated as project conditions of approval, which would preclude indirect impacts to the MHPA. Note that MHPA adjacency guidelines would apply to both land within the MHPA and land part of the VPHCP/MHPA.

Section 1.5.2 of the MSCP SAP provides general management recommendations to implement these guidelines, as summarized below in Table 4.10-5.

<b>Topic</b>	<b>Regulation</b>
Drainage	All new and proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance should include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.
Toxics	Land uses, such as recreation and agriculture, that use chemicals or generate by-products such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures should include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance should be provided. Where applicable, this requirement should be incorporated into leases on publicly owned property as leases come up for renewal.
Lighting	Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.
Noise	Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas, and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures should also be incorporated for the remainder of the year.
Barriers	New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls and/or signage) along the MHPA boundary to direct public access to appropriate locations and reduce domestic animal predation.
Invasives	No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

Table 4.10-5 Land Use Adjacency Guidelines Summary	
Topic	Regulation
Brush Management	New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zone 2 should be placed in an open space easement that identifies a homeowners association or other private party that would be responsible for the ongoing Zone 2 brush management activities. The amount of woody vegetation thinning shall not exceed 50 percent of the vegetation existing when the initial thinning is done. Vegetation thinning shall be done consistent with San Diego standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area would be the responsibility of a homeowners association or other private party.
Grading/Land Development	Manufactured slopes associated with site development shall be included within the development footprint for proposed projects within or adjacent to the MHPA.

### Boundary Adjustments

Section 1.1.1 of the MSCP SAP discusses MHPA boundary line adjustments. Boundary line corrections are also allowable under certain circumstances.

#### ***MHPA Boundary Line Adjustments***

Private land wholly within the MHPA is allowed up to 25 percent development in the least sensitive portion of the site per the City's MSCP SAP. Should more than 25 percent development be desired, an MHPA boundary line adjustment may be proposed. MHPA boundary line adjustments may be made without the need to amend a community plan in cases where the new MHPA boundary results in an area of equivalent or higher biological value. The determination of the biological value of a proposed boundary change would be made by the City in accordance with the MSCP SAP, with the concurrence of the wildlife agencies. If the determination is that the adjustment would result in the same or higher biological value of the MHPA, no further action by the jurisdictions or wildlife agencies shall be required. Any adjustment to the MHPA boundary would be disclosed in the environmental document as part of the project description prepared for the specific future project. An evaluation of the proposed boundary adjustment would be provided in the biological technical report and summarized in the land use and biological resources sections of the environmental document associated with a future project. An adjustment that does not meet the equivalency test shall require additional documentation and may result in an amendment to the MSCP SAP. All MHPA boundary line adjustments require approval by the U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, and the City.

For parcels located outside the MHPA, "there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by state and federal agencies) and narrow endemic species." However, "impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance" with the City's Biology Guidelines (2018).

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### ***MHPA Boundary Line Corrections***

The original MHPA boundary was established as part of the regional MSCP mapping efforts, which became effective in March 1997. MHPA boundary line corrections are allowed under the City's MSCP SAP to rectify minor mapping inaccuracies at the project level and can be processed with the project's discretionary or ministerial review. MHPA corrections typically involve removing existing, pre-MSCP SAP development (e.g., existing homes) from the mapped MHPA. The fundamental difference between MHPA boundary line corrections and adjustments is that MHPA boundary line adjustments involve removing habitat or buffer areas from the MHPA and require concurrence with the wildlife agencies, whereas MHPA boundary line corrections do not. An MHPA boundary line correction would typically be considered by the City when it can be shown that there is a discrepancy between the adopted MHPA boundary and other historical mapping information (e.g., aerial photography, vegetation maps, topographic maps), which results in inclusion of existing developed areas in the MHPA due to the regional scale of the MHPA mapping.

During preparation of the proposed project, the City conducted a broad-scale review of the University CPU area to evaluate areas designated as open space and areas within the MHPA for their contribution to conservation of ESL to determine if any MHPA boundary line corrections were required. The City identified an approximate additional 26 acres to be corrected into the MHPA preserve. Future projects within the City, however, may identify the need for MHPA boundary line corrections during the more detailed studies conducted during the planning process for these projects. To determine if an MHPA boundary line correction is required, the applicant should review applicable available GIS layers for the project area, document the existing conditions on the project site, and provide any pre-MSCP SAP approved permits. If there appears to be a mapping error, an MHPA boundary line correction may be considered if it would not result in (a) removal of habitat, including wetlands; or (b) impacts to biological buffer areas (e.g., wetland buffers, wildlife corridors). An MHPA boundary line correction would not prevent the applicant from having to comply with the City's MHPA Land Use Adjacency Guidelines, ESL Regulations, and Steep Hillside Regulations, and other applicable regulations as outlined in the MSCP SAP.

### ***General Management Directives***

General Management Directives outlined in Section 1.5.2 of the MSCP SAP are outlined below, including a discussion of project compliance.

#### ***Mitigation***

Mitigation, when required as part of project approvals, shall be performed in accordance with the City's ESL Regulations and Biology Guidelines.

#### ***Restoration***

Restoration or revegetation undertaken in the MHPA shall be performed in a manner acceptable to the City and as outlined in the Biology Guidelines. Where covered species status identifies the need for reintroduction and/or increasing the population, the covered species will be included in restoration/revegetation plans, as appropriate. Restoration or revegetation proposals will be required to prepare a plan that includes elements addressing financial responsibility, site



preparation, planting specifications, maintenance, monitoring and success criteria, and remediation and contingency measures. Wetland restoration/revegetation proposals are subject to permit authorization by federal and state agencies.

### ***Public Access, Trails, and Recreation***

Policies are summarized below.

1. Provide sufficient signage to clearly identify public access to the MHPA. Barriers, such as vegetation, rocks/boulders for fencing may be necessary to protect highly sensitive areas.
2. Locate trails, view overlooks, and staging areas in the least sensitive areas of the MHPA. Locate trails along the edges of urban land uses adjacent to the MHPA, following existing dirt roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types.
3. In general, avoid paving trails unless management and monitoring evidence shows otherwise. Clearly demarcate and monitor trails for degradation and off-trail access and use. Provide trail repair/maintenance as needed. Undertake measures to counter the effects of trail erosion including the use of stone or wood cross-joints, edge plantings of native grasses, and mulching of the trail.
4. Minimize trail widths to reduce impacts to critical resources. For the most part, do not locate trails wider than 4 feet in core areas or wildlife corridors. Provide trail fences or other barriers at strategic locations when protection of sensitive resources is required.
5. Limit the extent and location of equestrian trails to the less sensitive areas of the MHPA.
6. Off-road or cross-country vehicle activity is an incompatible use in the MHPA, except for law enforcement, preserve management or emergency purposes. Restore disturbed areas to native habitat where possible or critical, or allow to regenerate.
7. Limit recreational uses to passive uses such as birdwatching, photography and trail use. Locate developed picnic areas near MHPA edges or specific areas within the MHPA, in order to minimize littering, feeding of wildlife, and attracting or increasing populations of exotic or nuisance wildlife (opossums, raccoons, skunks). Where permitted, restrain pets on leashes.
8. Remove homeless and itinerant worker camps in habitat areas as soon as found pursuant to existing enforcement procedures.
9. Maintain equestrian trails on a regular basis to remove manure (and other pet feces) from the trails and preserve system in order to control cowbird invasion and predation. Design and maintain trails where possible to drain into a gravel bottom or vegetated (e.g., grass-lined) swale or basin to detain runoff and remove pollutants.

### ***Litter/Trash and Materials Storage***

1. Remove litter and trash on a regular basis. Post signage to prevent and report littering in trail and road access areas. Provide and maintain trash cans and bins at trail access points.

2. Impose penalties for littering and dumping. Fines should be sufficient to prevent recurrence and also cover reimbursement of costs to remove and dispose of debris, restore the area if needed, and to pay for enforcement staff time.
3. Prohibit permanent storage of materials (e.g., hazardous and toxic chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, due to potential leakage.
4. Keep wildlife corridor under crossings free of debris, trash, homeless encampments, and all other obstructions to wildlife movement.

#### ***Adjacency Management Issues***

1. Enforce, prevent and remove illegal intrusions into the MHPA (e.g., orchards, decks, etc.) on an annual basis, in addition to complaint basis.
2. Disseminate educational information to residents adjacent to and inside the MHPA to heighten environmental awareness, and inform residents of access, appropriate plantings, construction or disturbance within MHPA boundaries, pet intrusion, fire management, and other adjacency issues.
3. Install barriers (fencing, rocks/boulders, vegetation) and/or signage where necessary to direct public access to appropriate locations.

#### ***Invasive Exotics Control and Removal***

1. Do not introduce invasive non-native species into the MHPA. Provide information on invasive plants and animals harmful to the MHPA, and prevention methods, to visitors and adjacent residents. Encourage residents to voluntarily remove invasive exotics from their landscaping.
2. Remove giant reed, tamarisk, pampas grass, castor bean, artichoke thistle, and other exotic invasive species from creek and river systems, canyons and slopes, and elsewhere within the MHPA as funding or other assistance becomes available.
3. If funding permits, initiate a baseline survey with regular follow-up monitoring to assess invasion or re-invasion by exotics, and to schedule removal.
4. Conduct an assessment of the need for brown-headed cowbird trapping in each area of the MHPA where cattle, horse, and other animals are kept.
5. If eucalyptus trees die or are removed from the MHPA area, replace with appropriate native species. Ensure that eucalyptus trees do not spread into new areas, nor increase substantially in numbers over the years. Eventual replacement by native species is preferred.
6. On a case-by-case basis some limited trapping of non-native predators may be necessary.

### **Flood Control**

1. Perform standard maintenance, such as clearing and dredging of existing flood channels, during the non-breeding or nesting season of sensitive bird or wildlife species utilizing the riparian habitat. For the least Bell's vireo, the non-breeding season generally includes mid-September through mid-March.
2. Review existing flood control channels within the MHPA periodically (every five to ten years) to determine the need for their retention and maintenance, and to assess alternatives, such as restoration of natural rivers and floodplains.

### **i. Vernal Pool Habitat Conservation Plan**

The City's VPHCP is intended to provide a framework to protect, enhance, and restore vernal pool resources within the City, while improving and streamlining the environmental permitting process for impacts to threatened and endangered species associated with vernal pools. The VPHCP covered species includes the following seven threatened and endangered species:

- Otay Mesa mint (*Pogogyne nudiuscula*)
- San Diego Mesa mint (*Pogogyne abramsii*)
- Spreading navarretia (*Navarretia fossalis*)
- San Diego button-celery (*Eryngium aristulatum* var. *parishii*)
- California Orcutt grass (*Orcuttia californica*)
- Riverside fairy shrimp (*Streptocephalus woottoni*)
- San Diego fairy shrimp (*Branchinecta sandiegonensis*)

The VPHCP is compatible with and expands existing MHPA lands to conserve additional lands with vernal pool resources. The VPHCP preserve area expands on the City's existing MHPA by including areas for 75 percent and 100 percent conservation. Chapter 7 of the VPHCP addresses the management and monitoring strategy including site specific management and monitoring actions for vernal pool complexes to be managed to achieve VPHCP objectives. Impacts to land identified as 100 percent baseline conservation in the VPHCP (referred to as VPHCP/MHPA) require both mitigation and a boundary line adjustments (BLA) consistent with the VPHCP. ~~Substantive impacts to 100 percent baseline conservation lands would require an amendment to the VPHCP.~~ Impacts to 100 percent conservation lands require non-MHPA replacement lands that meet the City's functional equivalency requirements.

### **VPHCP Avoidance and Minimization Measures**

Section 5.2 of the VPHCP requires indirect impacts to conserved vernal pools to be minimized by requiring development projects adjacent to the hard line preserve to comply with MSCP Land Use Adjacency Guidelines in addition to the VPHCP Section 5.2.1 avoidance and minimization measures, detailed below.

1. Any development adjacent to the MHPA shall be constructed to slope away from the extant pools to be avoided, to ensure that runoff from the project does not flow into the pools.

2. Covered projects shall require temporary fencing (with silt barriers) of the limits of project impacts (including construction staging areas and access routes) to prevent additional vernal pool impacts and prevent the spread of silt from the construction zone into adjacent vernal pools. Fencing shall be installed in a manner that does not impact habitats to be avoided. Final construction plans shall include photographs that show the fenced limits of impact and all areas of vernal pools to be impacted or avoided. If work inadvertently occurs beyond the fenced or demarcated limits of impact, all work shall cease until the problem has been remedied to the satisfaction of the City. Temporary construction fencing shall be removed upon project completion.
3. Impacts from fugitive dust that may occur during construction grading shall be avoided and minimized through watering and other appropriate measures.
4. A qualified monitoring biologist that has been approved by the City shall be present during project construction activities to ensure compliance with all mitigation measures identified in the CEQA environmental document. The biologist shall be knowledgeable of vernal pool species biology and ecology. The biologist shall perform the following duties:
  - a. Oversee installation of and inspect the fencing and erosion control measures within or upslope of vernal pool restoration and/or preservation areas a minimum of once per week and daily during all rain events to ensure that any breaks in the fence or erosion control measures are repaired immediately.
  - b. Periodically monitor the work area to ensure that work activities do not generate excessive amounts of dust.
  - c. Train all contractors and construction personnel on the biological resources associated with this project and ensure that training is implemented by construction personnel. At a minimum, training shall include (1) the purpose for resource protection; (2) a description of the vernal pool species and their habitat(s); (3) the conservation measures that must be implemented during project construction to conserve the vernal pool species, including strictly limiting activities, vehicles, equipment, and construction materials to the fenced project footprint to avoid sensitive resource areas in the field (i.e., avoided areas delineated on maps or on the project-level analysis area by fencing); (4) environmentally responsible construction practices as outlined in Measures 5, 6, and 7 below; (5) the protocol to resolve conflicts that may arise at any time during the construction process; and (6) the general provisions of the project's mitigation monitoring and reporting program, the need to adhere to the provisions of federal Endangered Species Act (FESA), and the penalties associated with violating FESA.
  - d. Halt work, if necessary, and confer with the City to ensure the proper implementation of species and habitat protection measures. The biologist shall report any violation to the City within 24 hours of its occurrence.
  - e. Submit regular (e.g., weekly) letter reports to the City during project construction and a final report following completion of construction. The final report shall include as-built

construction drawings with an overlay of habitat that was impacted and avoided, photographs of habitat areas that were avoided, and other relevant summary information documenting that authorized impacts were not exceeded and that general compliance with all conservation measures was achieved.

5. The following conditions shall be implemented during project construction:
  - a. Employees shall strictly limit their activities, vehicles, equipment, and construction materials to the fenced project footprint.
  - b. The project site shall be kept as clean of debris as possible. All food-related trash items shall be enclosed in sealed containers and regularly removed from the site.
  - c. Disposal or temporary placement of excess fill, brush, or other debris shall be limited to areas within the fenced project footprint.
6. All equipment maintenance, staging, parking, and dispensing of fuel, oil, coolant, or any other such activities shall occur in designated areas within the fenced project impact limits. These designated areas shall be located in previously compacted and disturbed areas to the maximum extent practicable in such a manner as to prevent any runoff from entering the vernal pools or their watersheds and shall be shown on the construction plans. Fueling of equipment shall take place within existing paved areas greater than 100 feet from the vernal pools or their watersheds. Contractor equipment shall be checked for leaks prior to operation and repaired as necessary. A spill kit for each piece of construction equipment shall be available and must be used in the event of a spill. "No fueling zones" shall be designated on construction plans.
7. Grading activities immediately adjacent to vernal pools shall be timed to avoid wet weather to minimize potential impacts (e.g., siltation) to the vernal pools unless the area to be graded is at an elevation below the pools. To achieve this goal, grading adjacent to avoided pools shall comply with the following:
  - a. Grading shall occur only when the soil is dry to the touch both at the surface and 1 inch below. A visual check for color differences (i.e., darker soil indicating moisture) in the soil between the surface and 1 inch below indicates the soil is dry.
  - b. After a rain of greater than 0.2-inch, grading shall occur only after the soil surface has dried sufficiently as described above, and no sooner than 2 days (48 hours) after the rain event ends.
  - c. To prevent erosion and siltation from storm water runoff due to unexpected rains, Best Management Practices (e.g., silt fences) shall be implemented as needed during grading.
  - d. If rain occurs during grading, work shall stop and resume only after soils are dry, as described above.

- e. Grading shall be done in a manner to prevent runoff from entering preserved vernal pools.
  - f. If necessary, water spraying will be conducted at a level sufficient to control fugitive dust but not to cause runoff into vernal pools.
  - g. If mechanized grading is necessary, grading will be performed in a manner to minimize soil compaction (i.e., use the smallest type of equipment needed to feasibly accomplish the work).
8. Prior to project construction, topsoil shall be salvaged from the impacted vernal pools or road ruts with fairy shrimp consistent with the requirements of the approved mitigation plan (e.g., free of versatile fairy shrimp). Vernal pool soil (inoculum) shall be collected when dry to avoid damaging or destroying fairy shrimp cysts and plant seeds. Hand tools (e.g., shovels and trowels) shall be used to remove the first 2 inches of soil from the pools. Whenever possible, the trowel shall be used to pry up intact chunks of soil, rather than loosening the soil by raking and shoveling, which can damage the cysts. The soil from each pool shall be stored individually in labeled boxes that are adequately ventilated and kept out of direct sunlight in order to prevent the occurrence of fungus or excessive heating of the soil, and stored off-site at an appropriate facility for vernal pool inoculum. Inoculum from different source pools shall not be mixed for seeding any restored pools, unless otherwise approved by the City and Wildlife Agencies. The collected soils shall be spread out and raked into the bottoms of the restored pools. Topsoil and plant materials salvaged from the upland habitat areas to be impacted shall be transplanted to, and/or used as a seed/cutting source for, the upland habitat restoration/creation areas to the maximum extent practicable as approved by the City.
9. Permanent protective fencing shall be used along any interface with developed areas and/or other measures approved by the City to deter human and pet entrance into on- or off-site habitat shall be installed. Fencing shall be shown on the development plans and should have no gates (accept to allow access for maintenance and monitoring of the biological conservation easement areas) and be designed to prevent intrusion by pets. Signage for the biological conservation easement area shall be posted and maintained at conspicuous locations. The requirement for fencing and/or other preventative measures shall be included in the project's mitigation program.

### ***General Conditions for Compensatory Mitigation***

Section 5.3.2 of the VPHCP addresses general conditions for compensatory mitigation and requires project specific vernal pool restoration, enhancement, and preservation plans consistent with these guidelines. The three general conditions and how the project is consistent with the VPHCP are listed below.

1. The project proponent shall submit a vernal pool restoration/enhancement/ preservation plan to the City (Development Services Environmental Analysis Section and Planning Department MSCP Staff) and Wildlife Agencies for approval as part of the development review process and the plan shall be included as an attachment to the project's CEQA



document. The restoration plan shall be consistent (as applicable) with the restoration plan outline included in Attachment B of the City's Land Development Manual Biology Guidelines. The plan must be approved and implemented prior to or concurrent with project impacts.

The project proponent shall ensure the long-term management of the on-site areas shall occur in perpetuity. Each project proponent shall implement a perpetual management, maintenance, and monitoring plan (e.g., Habitat Management Plan) for their respective biological conservation easement areas. The plan, which shall be approved by the City and Wildlife Agencies and funding source must be established prior to, or concurrent with, impacts. The plan should include, but not be limited to, the following: method of protecting the resources in perpetuity (i.e., covenant of easement dedication to the City, or a deed restriction or other conservation mechanism consistent with California Civil Code Section 815, et seq. and/or Government Code Section 65870 and acceptable to the Wildlife Agencies; monitoring schedule; measures to prevent human and exotic species encroachment; funding mechanism; and contingency measures should problems occur. In addition, the plan shall include the proposed land manager's name, qualifications, business address, and contact information. The project proponent shall also establish a nonwasting endowment or similar secure funding method in an amount approved by the City and the Wildlife Agencies based on a Property Analysis Record (PAR; Center for Natural Lands Management ~~1998~~2024), or similar cost estimation method, to secure the ongoing funding for the perpetual long-term management, maintenance, and monitoring of the biological conservation easement area by an agency, nonprofit organization, or other entity approved by the City and the Wildlife Agencies.

In the event that a new occurrence of a covered species is identified (i.e., previously undocumented) within an area to be impacted by a covered project or covered activity, mitigation shall be required in the form of salvage and restoration for the impact to the new occurrence. Mitigation shall occur consistent with Conditions 1 and 2 above, as well as the City's Land Development Manual Biology Guidelines.

## **j. Historical Resources Regulations**

The purpose of the City's HRR (LDC Sections 143.0201 through 143.0280) is to protect, preserve, and, where damaged, restore the historical resources of San Diego. Historical resources include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to protect historical resources quality, and to protect the educational, cultural, economic, and general welfare of the public, while maintaining sound historical preservation principles and the rights of property owners.

### **4.10.3 Significance Determination Thresholds**

Thresholds used to evaluate potential impacts related to land use and planning are based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project physically divide an established community?
- 2) Would the project cause a significant environmental impact due to a conflict with any land use plan or policy adopted for the purpose of avoiding or mitigating an environmental effect?
- 3) Would the project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?

## 4.10.4 Impact Analysis

### Issue 1 Physically Divide an Established Community

*Would the project physically divide an established community?*

Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are planning level actions that propose a policy and land use framework that guides future development including land use plan updates, code amendments, and rezones; however, no specific development is proposed at this time.

Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would guide future development in appropriate locations, including supporting higher residential density within appropriate areas including within the ~~defined~~ Climate Smart Village ~~propensity~~ Areas. The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, impacts associated with future development are more likely to be concentrated in these areas. Within Hillcrest, changes to the mobility network are contemplated to enhance the mobility experience for pedestrians, bicyclists, and transit users; however, changes are not anticipated to divide the community or impede access. Future implementation of the mobility network in the City, including planned SANDAG transportation investments, are supportive of enhanced transit, trolley, commuter rail lines, and streetcar service. Commuter rail from Downtown San Diego to the City of El Cajon via Hillcrest and streetcar service from downtown San Diego to the Hillcrest neighborhood would support transit and represent linear infrastructure that if not properly designed could physically divide a community. However, implementation of these planned transit improvements has a key goal of connecting communities, not dividing them. City and SANDAG policies which focus on enhancing pedestrian, bicycle and transit connections would be implemented through the design of future infrastructure improvements, avoiding the physical division of community.

Similarly, updates to the mobility network plan along key corridors in the University CPU would serve to improve functionality and safety for all users of the roadway. Key mobility element policies included in the General Plan, University CPU, and Hillcrest FPA are reported in Section 4.14.4, Issue 1. As discussed therein, a key focus of the City is to support improvements to the mobility network to increase connectivity within the City by providing enhanced bicycle, pedestrian, and transit connections. Policies such as the University CPU Policy 3.1A support creating a continuous

pedestrian and bicycle network with amenities to further accommodate and encourage residents to walk or ride a bike for their commuting and daily needs. Within the Hillcrest FPA, Policy MO-1.6 would support implementation of pedestrian enhancements including but not limited to bulb-outs/curb extensions, pedestrian promenades, enhanced crossing treatments, traffic calming, leading pedestrian intervals, continental crosswalk, and exclusive pedestrian phases. Such mobility improvements would be localized and would not have the potential to physically divide a community.

Updates to the General Plan Mobility Element that are part of the Blueprint SD Initiative include changes to reflect planned transit connections consistent with SANDAG's current Regional Plan. Future transit improvements may include, but are not limited to, new commuter rail lines, light rail, Next Gen Rapid Transit, and automated people movers within the City. New or expanded rail lines can divide communities if not appropriately sited. Overall policy changes related to mobility are intended to support community accessibility by all; however, as future projects are proposed consistent with the proposed policy and land use framework defined by the Blueprint SD Initiative, the University CPU and the Hillcrest FPA, the potential for physical division of community would need to be assessed at the project-level as future site-specific projects are proposed.

At the project-level, the City's Transportation Study Manual requires projects to demonstrate consistency with key General Plan goals and policies. Relevant to physical division of community, the Transportation Study Manual requires projects to demonstrate consistency with the Land Use and Community Planning Element goal to "Improve mobility options and accessibility in every community." The following two policies (as amended to reflect the proposed revisions to this element) support this goal:

- LU-I.9 Design transportation projects so that the resulting benefits and potential burdens are equitable. Some of the benefits of transportation programs include improved accessibility, faster trips, more mobility choices, and reduced congestion. Common negative consequences include health impacts of air pollution, noise, crash-related injuries and fatalities, dislocation of community members, and division of communities.
- LU-I.10 Improve mobility options and accessibility for the non-driving elderly, disabled, low-income, and other members of the population (see also Mobility Element).

For impacts related to construction activities, such as temporary road closures, could impede access to a community; however, such effects would be temporary and public right-of way permits are required pursuant to SDMC Chapter 12, Article 9, Division 7 which could include requirements for traffic control plans to ensure community accessibility is retained and/or alternative routes are provided. Overall, implementation of the project would not include elements that could physically divide a community and impacts would be less than significant.

## Issue 2 Conflict with a Land Use Plan, Policy, or Regulation

*Would the project cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

Plans and policies to be consulted for this analysis include the City's General Plan, City's Land LDC, including ESL Regulations, applicable community plans, Precise or Specific Plans, LCP, ALUCPs, City's CAP, SANDAG's Regional Plan, City's Bicycle Master Plan, MSCP SAP, and the City's VPHCP.

### a. San Diego Forward: The Regional Plan

Implementation of the Blueprint SD Initiative, the University CPU, and Hillcrest FPA would support implementation of the SANDAG Regional Plan by supporting land use changes that would allow for increased residential and mixed-use development density and intensity in locations that either currently support transit or are planned to have access to transit improvements as outlined in the 2050 Regional Plan. An overall goal of the respective planning efforts is to add density in locations that would support a mode shift from single occupancy vehicles to non-vehicular modes including walking/rolling, bicycling and transit. Implementation of land use changes in the University CPU and Hillcrest FPA-, in addition to future land use changes proposed for consistency with the Village Climate Goal Propensity map would be consistent with and implement key goals of the Regional Plan due to growth being planned within focus areas identified as Climate Smart Village Areas. The Climate Smart Village Areas were identified based on a land use model that incorporates the transportation vision of the Regional Plan. For more information regarding the methodology for development of the Village Climate Goal Propensity Map, refer to Attachment A of Appendix J.

Within the University CPU area, development intensities are focused around the trolley line and areas with existing or future planned transit improvements. Similarly, implementation of the Hillcrest FPA would increase development intensities in Hillcrest and the Medical Complex neighborhoods that are close to employment and transit centers, which would be supportive of planned transit improvements including dedicated transit facilities along Park Boulevard and University and SANDAG Regional Plan improvements including a Streetcar, Next Gen Rapid Transit, and Commuter Rail (see Figure 3-12).

The Blueprint SD Initiative, the Hillcrest FPA and the University CPU would facilitate high-density residential and mixed-use development within Climate Smart Village Areas to create compact, walkable communities close to transit connections and consistent with the General Plan smart growth principles. The Blueprint SD Initiative's' policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, impacts associated with future development are more likely to be concentrated in these areas. The updated Village Climate Goal Propensity Map (see Figure 3-1a through 3.1e) proposed as part of the project incorporates the 2050 regional transportation network. Therefore, the adoption and implementation of the proposed project would not generate any conflict or inconsistencies with the SANDAG Regional Plan; thus, impacts would be less than significant.

## b. City of San Diego General Plan

The Blueprint SD Initiative, the Hillcrest FPA and the University CPU would facilitate transit-oriented, multiple-use villages, districts, and developments within Climate Smart Village Areas in line with the General Plan's Village Climate Goal Propensity Map (see Figure 3-1). The proposed project would implement the General Plan City of Villages strategy, by allowing increased densities for multi-family residential development to occur in Climate Smart Village Areas, and would implement the General Plan's goals, objectives, and policies related to the provision of housing and affordable housing. All new development and redevelopment within the City would be required to be consistent with the Village Climate Goal Propensity map (see Figure 3-1a through 3.1e) and would be required to comply with the policies of the general plan at the project-level. The Blueprint SD Initiative's' policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, impacts associated with future development are more likely to be concentrated in these areas.

Table 4.10-65 describes how future development anticipated under the project would be consistent with the Elements of the City's General Plan. As detailed in Table 4.10-65, the project would be consistent with all applicable General Plan elements; therefore, impacts related to General Plan policy consistency would be less than significant.

Table 4.10-65 Project Consistency with General Plan Elements	
Element	Consistency
<p><b>Mobility Element:</b> This element aims to improve mobility through the development of a balanced, multi-modal transportation network that minimizes environmental impacts.</p>	<p>The project would facilitate placement of <del>non-residential</del> mixed-use development and multi-family development in appropriate area of the City consistent with the Village Climate Goal Propensity Map and primarily within Climate Smart Village Areas, which are primarily areas in close proximity to existing and planned transit, pedestrian, and bicycle facilities. The Blueprint SD Initiative land use framework is intended to increase the opportunity for homes and jobs near transit, especially in areas that contribute to the reduction of per capita VMT and GHG emissions. Development facilitated by implementation of the proposed project would encourage public use of transit, as well as reduce reliance on the automobile. The Hillcrest FPA and University CPU supports high density residential and mixed-use development in an area with access to public transit, and would encourage active transportation and reduce automobile trips for work commutes. The Mobility Element is proposed to be amended as part of Blueprint SD Initiative, which would advance the City's strategy for increased mobility choices in a manner that strengthens the City of Villages strategy. The environmental impacts associated with automobile use would be minimized accordingly through implementation of Mobility Element policies at the project-level. Program-level policies of each of these plans are consistent with the Mobility Element's goals of the development of a balanced, multi-modal transportation network. Future development under the proposed project would be consistent with the proposed Mobility Element.</p>

<b>Table 4.10-65</b>	
<b>Project Consistency with General Plan Elements</b>	
Element	Consistency
<p><b>Urban Design:</b> This element addresses urban form and design through policies aimed at respecting the natural environment, preserving open space systems and targeting new growth into compact villages.</p>	<p>Implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would facilitate the development of context sensitive development within the City, focusing within Climate Smart Village Areas, consistent with the core values and principles of the Urban Design Element to highlight the cultural diversity of the City. Additionally, the opportunity for the development of additional homes facilitated by the Blueprint SD Initiative, the Hillcrest FPA and the University CPU is intended to encourage active transportation and provide more opportunities for quality public spaces which is consistent with the goal of the Urban Design Element. These Climate Smart Village Areas are best suited to support high multi-family residential densities to create the urban villages envisioned by the City of Villages strategy, due to existing high levels of activity and availability of transit and would help preserve open space systems by concentrating development in existing developed areas. In addition, the updated urban design elements of the University CPU and Hillcrest FPA would facilitate the development of publicly accessible promenades, and public space design which would be consistent with the Urban Design Element's goals of creating a community in which community members can enjoy time outside.</p>
<p><b>Public Facilities, Services, and Safety Element:</b> This element ensures the provision and maintenance of infrastructure and public services for future growth without diminishing services to existing development.</p>	<p>As the implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would facilitate higher density development within the Climate Smart Village Areas, the provision of new and expanded infrastructure and public services would be necessitated. Future development would be required to provide or fund necessary facility improvements through payment of fees to implement neighborhood supportive infrastructure. As development occurs, future public infrastructure/service needs will be evaluated. Therefore, the implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would be consistent with the goals of the Public Facilities, Services, and Safety Element.</p>
<p><b>Recreation Element:</b> This element provides citywide guidance for the preservation, protection, acquisition, development, and enhancement of public recreation opportunities and facilities throughout the city for all users.</p>	<p>Future residential developments facilitated by the implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would be required to fund or provide public amenities. While future development allowed under the proposed project may not provide public parks as defined in the Recreation Element, individual developments would be required to provide a new community-serving infrastructure amenity, in the form of a publicly-accessible promenade, or would be required to pay a Neighborhood Enhancement Fee which would go towards the construction of neighborhood enhancing improvements (as detailed in Chapter 3.0 of this PEIR). The improvement or payment of this fee would implement and be consistent with the Recreation Element's policy to encourage private development to include recreation facilities. As part of the University CPU, the Parks and Recreation chapter is updated to refine goals and policies meant to facilitate the achievement of the General Plan Recreation Element standards.</p>



<b>Table 4.10-65 Project Consistency with General Plan Elements</b>	
Element	Consistency
<p><b>Conservation Element:</b> This element addresses hillside and open space conservation and habitat protection, as well as sustainability goals.</p>	<p>The University CPU includes updates to the Open Space and Conservation Element, which includes a proposal to dedicate several City-owned properties as open space to facilitate the continuous connection of MHPA lands and includes updated goals to preserve and enhance habitat and open space. Development facilitated by the implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU within the Climate Smart Village Areas would be subject to the policies of the conservation element regarding sustainable development, preservation of open space and wildlife, management of resources, and other initiatives to protect the public health, safety and welfare and would be required to comply with applicable sections of the SDMC and LDC regarding <del>Environmentally Sensitive Lands (ESL)</del>, the MSCP SAP, and VPHCP. Should development be proposed within ESL, the project would require a Site Development Permit and would be subject to the City's ESL Regulations.</p> <p>Future development allowed under the project would be required to adhere to the most current Title 24 Energy Code and <u>California Green Building Standards Code-CALGreen</u> requirements that address energy and water conservation in buildings. Storm water regulations and associated Best Management Practices and Low Impact Development practices to manage storm water would be implemented at the project level.</p> <p>Therefore, implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would be consistent with the Conservation Element.</p>
<p><b>Historic Preservation Element:</b> This element is intended to preserve, protect, restore, and rehabilitate historical and cultural resources throughout the City.</p>	<p>Future development facilitated by the implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would be consistent with the Historic Preservation Element through required compliance with the City's HRR, which protect and preserve historical resources and archaeological sites. Should development be proposed that deviates from the HRR, a Site Development Permit and site-specific environmental review and mitigation is required. In addition, the Hillcrest FPA would include a new Lesbian, Gay, Bisexual, Transgender and Queer Cultural District which would be recognized by City Council Resolution, and provide additional protections for historical and cultural resources in the district consistent with the Historic Preservation Element. The Hillcrest FPA would also include the identification of a Historic District, which would include Community Plan Implementation Overlay Zone (CPIOZ) Supplemental Development Regulations, which would apply to supplement the Historical Resources Regulations in the SDMC. The University CPU includes an update to the Historic Preservation Chapter, which would result in revisions to the City's Historical Resources Guidelines are proposed to exempt specified areas within the University Community from historic review under SDMC Section 143.0212.</p>

Table 4.10-65 Project Consistency with General Plan Elements	
Element	Consistency
	Therefore, implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would be consistent with the Historic Preservation Element.
<p><b>Land Use Element and Community Planning Element:</b> This element provides the framework for developing community plans calling for the identification of appropriate land uses to meet the goals set by the City of Villages strategy.</p>	<p>The implementation of the Blueprint SD Initiative, the Hillcrest FPA and the University CPU would facilitate implementation of the City’s General Plan City of Villages strategy which focuses on directing population growth into mixed-use activity centers that are pedestrian-friendly and linked to an improved regional transit system. Blueprint SD Initiative identifies complementary land uses that facilitate transit-oriented, multiple-use villages, districts, and developments within the City’s Sustainable Development Areas in line with the General Plan’s Village Climate Goal Propensity Map and the <del>CAP</del>Climate Action Plan, while the Hillcrest FPA would focus higher intensity development for all income ranges in the Hillcrest and Medical Complex Neighborhoods closer to the employment and transit centers, consistent with the Land Use Element and Community Planning Element’s goals of directing future opportunities for homes and jobs into mixed-use activity centers that are pedestrian-friendly, serve as the center of the community, and are linked to the regional transit system. The University CPU includes a land use framework that balances climate goals with the need for sustainable economic growth by focusing higher density and intensity land uses around transit and job centers which would be consistent with the Land Use Element and Community Planning Element’s goals of providing guidance for infill development and redevelopment as provided by the City of Villages strategy. Therefore, the implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU is consistent with the Land Use and Community Planning Element.</p>
<p><b>Economic Prosperity Element:</b> This element is intended to ensure that the economy grows in ways that strengthens San Diego industries and creates jobs with self-sufficient wages, increases average income, and stimulates economic investment in the community.</p>	<p>The Blueprint SD Initiative, the Hillcrest FPA and the University CPU would streamline the development of the residential development near employment centers while providing critical links between the two through coordinated land use and mobility policies. An objective of Blueprint SD Initiative includes facilitating the development of housing and goods/services in select areas near employment centers with convenient transit access to improve the jobs-housing balance, enhance and strengthen employment areas, promote employment opportunities, and encourage sustainable development. The University CPU focuses this development near biotech jobs and the UCSD campus while the Hillcrest FPA- focuses this development near the Hillcrest and Medical Complex neighborhoods. These strategies would support the economic growth of the Climate Smart Village Areas.</p> <p>The implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would therefore be consistent with the Economic Prosperity Element.</p>

<b>Table 4.10-65 Project Consistency with General Plan Elements</b>	
Element	Consistency
<p><b>Noise Element:</b> This element focuses on minimizing excessive noise effects and improve the quality of life of people working and living in the City. The Noise Element identifies goals and related policies with regards to noise and land use compatibility, motor vehicle traffic noise, and trolley and train noise.</p>	<p>Development facilitated by implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would be required to consider noise attenuation in the project design of the site where land uses are located within 500 feet of a freeway. Additionally, future development would be required to comply with the City's Noise Ordinance in addition to interior noise level standards of the CBC. The Hillcrest FPA also proposes an amendment to the CPIOZ which would require new development within the <u>Commercial and Entertainment Activity Area</u><del>Mixed-Use Commercial Activity Boundary</del> to provide noticing to prospective buyers and renters regarding potential noise associated with commercial uses including restaurants, bars, and entertainment uses. Additionally, the Hillcrest FPA policy LU-2.14 encourages incorporating office uses as part of mixed-use developments and locating them to create a buffer between single-family neighborhoods and active evening uses.</p> <p>Therefore, implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would be consistent with the Noise Element.</p>
<p><b>Housing Element:</b> The Housing Element is intended to assist with the provision of adequate housing to serve San Diegans of every economic level and demographic group.</p>	<p>The implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would facilitate implementation of higher density residential development within the Climate Smart Village Areas. It would also facilitate implementation of the Housing Element by increasing production of market-rate and affordable units throughout the Climate Smart Village Areas. Blueprint SD Initiative would provide planned residential capacity to meet the City's Regional Housing Needs Allocation targets while providing housing of all types and for all income levels in a manner that affirmatively furthers fair housing.</p> <p>The implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would therefore be consistent with the Housing Element.</p>

### c. General Plan Noise Element

Future development under the proposed project could result in the exposure of sensitive receptors to ambient noise from motor vehicle traffic that exceeds standards established in the City's Noise Element of the General Plan. While the impacts of existing noise levels on future projects is generally not considered an impact under CEQA (e.g., because it addresses impacts of the environment on the project); this issue is addressed in the context of the City's Noise Element Standards which sets standards for exterior noise exposure associated with development projects. From a CEQA perspective, a significant impact would only result if a project would contribute traffic to a degree that would increase existing traffic noise levels by 3 dB(A), which generally would require a doubling of traffic volumes (see Section 4.11.1.1b). The average healthy ear can barely perceive a change of 3 dB(A); a change of 5 dB(A) is readily perceptible. The issue of potential increases of ambient noise levels is addressed in Section 4.11.4, Issue 1.

Regarding compatibility with Land Use–Noise Compatibility Guidelines, recent CPU EIRs found that traffic noise generally dominates the noise environments within certain areas. For example, the Final Program EIR for the Uptown CPU states, “Vehicles traveling on I-5, I-8, State Route 163 (SR-163) are the dominant vehicle noise sources affecting the Uptown CPU area” (City of San Diego 2016, Section 6.6.1.2). Likewise, the Mission Valley CPU area was also determined to be dominated by freeway noise (see Section 4.9.2.3 of the Mission Valley Community Plan Update Final PEIR [City of San Diego 2019b]). Both CPU EIRs included analyses which revealed the distances to the 60, 65, and 70 CNEL noise contours in both the existing and build-out conditions for freeways and major roadways and showed that new development would be concentrated within these contours.

Similarly, because future development would be concentrated primarily within Climate Smart Village Areas including in the University CPU area and Hillcrest FPA area, it is anticipated that traffic noise within all project areas would dominate the noise environment and it is likely that noise levels in outdoor usable spaces may exceed the General Plan’s Land Use–Noise Compatibility Guidelines. However, as the Village Climate Goal Propensity Map would direct density primarily into Climate Smart Village Areas and support a greater active transportation mode share, ambient noise levels at build-out could be less than what was evaluated in recent CPUs. Exterior noise levels ranging between 65 and 70 CNEL are considered “conditionally compatible” for multi-family units, and the Noise Element states (Section B, Motor Vehicle Traffic Noise) that although not generally considered compatible, the City conditionally allows multi-family and mixed-use residential uses up to 75 dB(A) CNEL in areas affected primarily by motor vehicle traffic noise with residential uses with a requirement to include noise attenuation measures to ensure an interior noise level of 45 dB(A) CNEL where a Community Plan allows multi-family and mixed-use. Although mode share may shift to rely more on active transportation, noise levels may still exceed these compatibility guidelines. While future development under the proposed project would attenuate noise at outdoor usable open space areas through project design, to the extent feasible, even with implementation of design measures, noise levels may nevertheless exceed the exterior noise standards of the City’s General Plan Land Use–Noise Compatibility Guidelines (Table NE-3). However, as detailed above, exceedance of exterior noise standards is not an impact under CEQA unless the project contributes to exterior noise levels in excess of 3dB(A) (see Section 4.11.4, Issue 1).

The University CPU specifically addresses the potential for future land uses to be exposed to noise due to development adjacent to freeways. The University CPU includes Supplemental Development Regulation (SDR) I.1 which requires buildings with residential uses on a premises abutting a freeway right-of-way to not have exterior common open space within 30 feet from the property line abutting a freeway right-of-way. ~~Implementation of future CPUs would similarly include policies to demonstrate~~ Further, required compliance with the General Plan Noise Element Land Use – Noise Compatibility Guidelines, as applicable to the community to ensure land uses are appropriately sited and designed with sensitivity to noise compatibility issues.

Regarding interior noise, residential/habitable interior noise standards of 45 dB(A) CNEL, and non-residential interior noise standards of 50 dB(A) CNEL would be achieved through compliance with Title 24 requirements during the building permit review. Pursuant to Title 24, future projects allowed under the proposed ordinance must demonstrate compliance with the relevant interior noise standards through submission and approval of a Title 24 Compliance Report (State of California

2022). Adherence to Title 24 requirements for interior noise analysis prior to issuance of a building permit would ensure compatibility with the General Plan Noise Element's interior noise standards.

Railway noise results from trolley and train travel, horns, emergency signaling devices, and stationary bells at grade crossings. The project areas are composed of land primarily within Climate Smart Village Areas and may be in proximity to trolley lines and rail corridors. For example, the Morena Corridor Specific Plan Program-EIR (City of San Diego 2019<sup>cb</sup>) analyzed potential noise impacts resulting from rail noise including the Los Angeles-San Diego-San Luis Obispo (LOSSAN) Rail line and the Mid-Coast Corridor Transit Project which is currently under construction. As detailed in that Program-EIR, sound levels resulting from trolley service were derived from the SANDAG Noise and Vibration Impacts Technical Report for the Mid-Coast Corridor Transit Project (SANDAG 2014). Freight and passenger train noise levels were based on Amtrak, Coaster, and freight train assumptions provided by the LOSSAN Rail Corridor Agency (LOSSAN 2012). Based on these studies, the PEIR found that rail traffic would generate a noise level of 60 CNEL at approximately 270 feet from the railway centerline. The analysis within the Morena Corridor Specific Plan Program-EIR found that while new development located adjacent to rail operations could expose residents to noise levels that exceed the City's Land Use-Noise Compatibility standards, vehicle traffic noise from nearby freeways would generate noise levels that exceed the contribution of noise from railroad operations.

Noise conditions evaluated within the Morena Corridor Specific Plan PEIR provide a representative analysis of potential rail noise exposure that could occur, with the analysis considering combined noise from the LOSSAN rail line in addition to a planned trolley line. The Morena Corridor Specific Plan Program-EIR concluded that impacts associated with rail noise would be significant and unavoidable. Similar to the Morena Corridor analysis related to potential rail noise, the proposed project could result in multi-family development in proximity to rail noise. Noise exposure of exterior use areas associated with future development anticipated under the project would be evaluated and disclosed in environmental documents; however, exposure of development to rail noise or other existing noise sources would not be considered a significant impact of the project on the environment. Rather, this would be an impact of the environment on the project (unless the project contributed to an increase in 3 dB(A) over existing levels, which is addressed in Section 4.11.4, Issue 1.

Regarding interior noise, Section 1207 of the CBC requires that interior noise levels attributable to exterior sources are not to exceed 45 CNEL in any habitable room. Generally, modern construction techniques can provide sufficient attenuation to reduce noise levels to meet the CBC requirement.

The Blueprint SD Initiative would amend the land use framework, as defined by the Village Climate Goal Propensity Map, to take into account the 2050 regional transportation network, which would focus residential and mixed-use development in locations subject to transportation noise such as trolley and rail lines and heavily traveled roadways. Throughout the project areas development could be impacted by exterior noise sources such as heavily travelled transportation corridors, which would require noise attenuation measures to be implemented to reduce noise to an acceptable noise level to ensure an acceptable interior noise level. Pursuant to the City Noise Element, multi-family residential uses are "compatible" with exterior noise levels up to 60 CNEL, and "conditionally compatible" with exterior noise levels up to 70 CNEL. In "conditionally compatible"

areas, feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable, and building structures must attenuate exterior noise levels to an indoor noise level of 45 CNEL. Any future residential use exposed to noise levels up to 75 CNEL must include attenuation measures to ensure an interior noise level of 45 CNEL and be in an area where a community plan allows multi-family or mixed-use residential uses. As future land uses are developed for consistency with the project, the requirements of the Noise Element Land Use–Noise Compatibility Criteria would be applied. Within Hillcrest, increased density is proposed in areas where noise related to commercial uses such as restaurants, bars, and entertainment uses is assumed to be high based on maximal acceptable noise level limits (~~SDMC~~~~City of San Diego~~ ~~Municipal Code~~ Section 59.5.0401). As detailed in Section 3.5.2.11, a CPIOZ-Type A would be applied to the Commercial Activity Area which includes key commercial areas depicted on Figure 3-17. The CPIOZ includes a SDR-D.1 which establishes limits on the hours of operations for eating and drinking establishments with a sidewalk cafe, outdoor patio, or active sidewalk within the Commercial and Entertainment Activity Area; and (SDR-D.2) which would require new residential development within the CPIOZ boundary depicted on Figure 3-17 to provide noticing to prospective buyers and renters regarding potential noise associated with eating and drinking establishments. While these noise events would be primarily associated with weekend and evening activity, the CPIOZ and SDRs for the Hillcrest commercial activity area would support land use compatibility related to noise.

Due to planned increases in development potential within areas subject to transportation noise, future development within the project areas could be subject to ambient noise levels in excess of General Plan noise level standards. While site attenuation and project design features would typically be sufficient to reduce noise levels to provide consistency with the standards, it is not possible to ensure all outdoor use areas would meet the City's noise level standards. Consistency with the City's noise compatibility standards would be disclosed in environmental documents; however, an inconsistency with the compatibility standards would typically be the result of existing environmental noise affecting the project, which is not significant under CEQA (e.g. impact of the environment on the project). Potential impacts related to a project contributing to an overall 3 dB(A) increase in ambient noise levels, affecting outdoor use areas, is addressed in Section 4.11.4, Issue 1. As a result, impacts related to consistency with the Noise Element would be less than significant.

#### **d. Environmentally Sensitive Lands Regulations**

ESL (e.g., sensitive biological resources, steep hillsides, flood hazard areas) occur within the project areas. The ESL Regulations apply to both ministerial and discretionary development. Future subsequent development facilitated by the implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would be subject to a review (both ministerial and discretionary projects) to identify whether ESL is located within the proposed development area. As described in Section 143.0113 of the ESL Regulations, the City may request information from the applicant to determine the existence and location of ESL. Such information may include but is not limited to a photo survey, historic photos, a geotechnical investigation, and/or a biological survey. Based on this information, the City will determine the existence and precise location of ESL. Should future development facilitated by the implementation of Blueprint SD Initiative, the Hillcrest FPA, and the University CPU be proposed within ESL, this would trigger a requirement for a discretionary permit to address potential impacts to ESL. The City's ESL Regulations (Chapter 14, Article 3, Division 1) require that projects demonstrate that the proposed development site is physically suitable for the



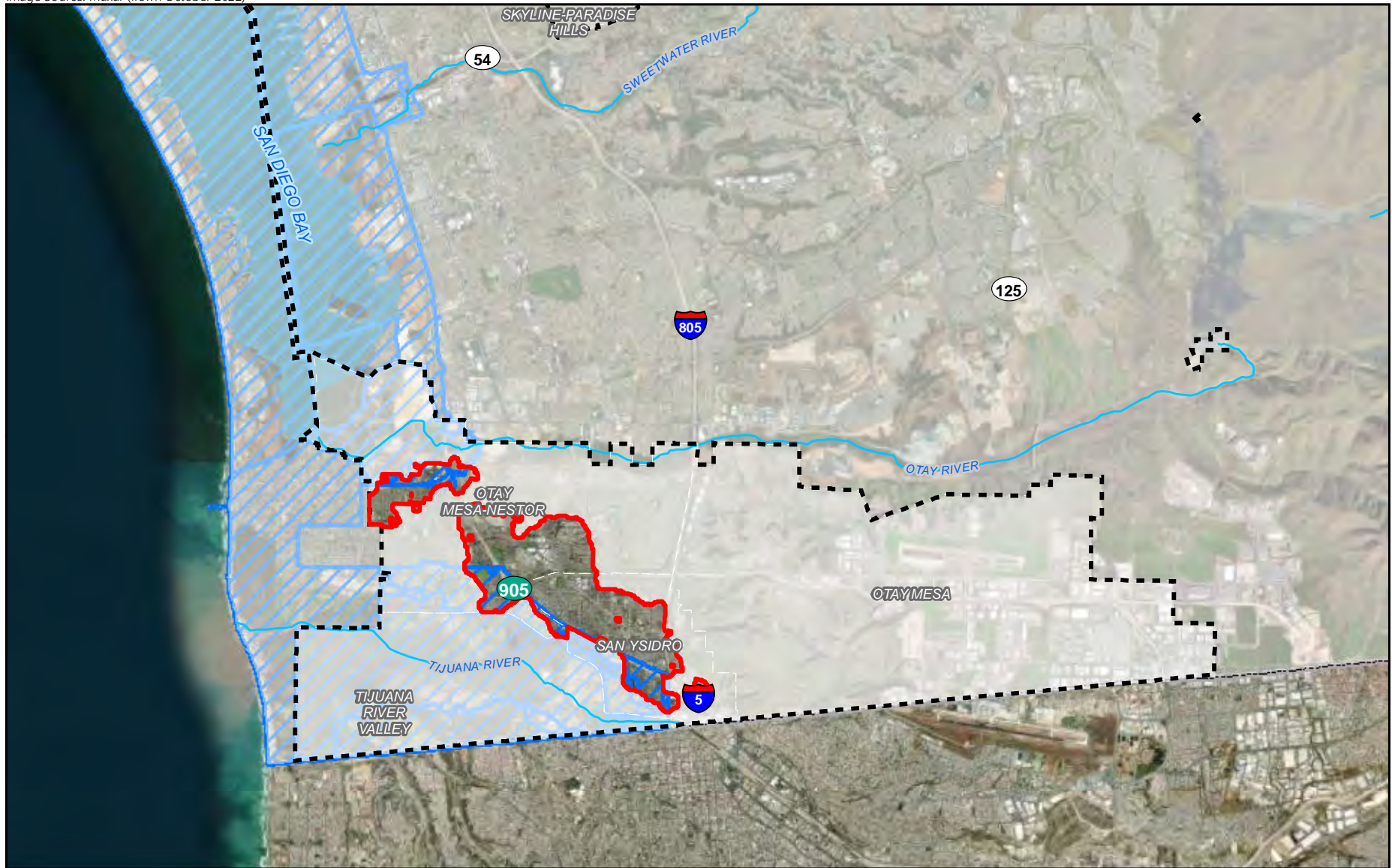
proposed use and would minimize disturbance to natural landforms and not increase flood hazards. Deviations from the ESL Regulations require supplemental findings be prepared prior to approval in order to show that development would not result in an additional public safety threat or extraordinary public expense or create a public nuisance. As existing procedures are in place to ensure compliance with the ESL Regulations, there would be no conflict with the ESL Regulations, and land use impacts would be less than significant.




### **e. California Coastal Act of 1976**

Approximately 2,859 acres of the Climate Smart Village Areas are located within the coastal zone (Figures 4.10-13a through 4.10-13e). Within the University CPU area 2,596 acres are located within the coastal zone. No portion of the Hillcrest FPA is within the coastal zone. Land use changes within the coastal zone are subject to the California Coastal Act and require a LCP amendment.

The only land use changes within the coastal zone currently proposed with the project are land use changes proposed within the University CPU area (see Figure 4.10-14). Within University, the Torrey Pines States Reserve, Torrey Pines Golf Course, part of UCSD, and some sections of the Scientific Research and Open Space land uses in the northwestern area of the University CPU area are within the Coastal Zone. Actions associated with the University Community within the Coastal Zone would require a future Coastal Commission action to approve an amended LCP that integrates the University CPU actions. The North City LCP Land Use Plan provides development criteria for portions of University that are within the Coastal Zone. The proposed University CPU serves as the LCP for the University community by incorporating the North City LCP through integration of its issues and proposals into the chapters and detailed policies.

The University CPU has been prepared to ensure consistency with the policies within the Coastal Act. The Coastal Act requires all jurisdictions within the Coastal Zone to prepare an LCP to guide development in the Coastal Zone. The LCP for the project areas within the Coastal Zone is integrated into the community plans of the applicable project areas. Land use changes within the University CPU area within the coastal zone will require a LCP amendment and approval by the Coastal Commission. No land uses within Hillcrest are within the Coastal Zone. While existing land uses and zoning would not change with the proposed action for lands within Climate Smart Village Areas, future land use changes that may be proposed in the Coastal Zone would be subject to a LCP amendment and Coastal Commission approval at the time land use changes are proposed. Additionally, future development within the coastal zone would be required to be consistent with the City's LCP or would require Coastal Commission review in deferred certification areas. Future development facilitated by the University CPU would be required to comply with the Coastal Development Permit procedures specified in the City's Land Development Code. A Coastal Development Permit is required unless a project qualifies for an exemption outlined within the procedures which will be determined during the Coastal Development Permit review process.



-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Coastal Zone


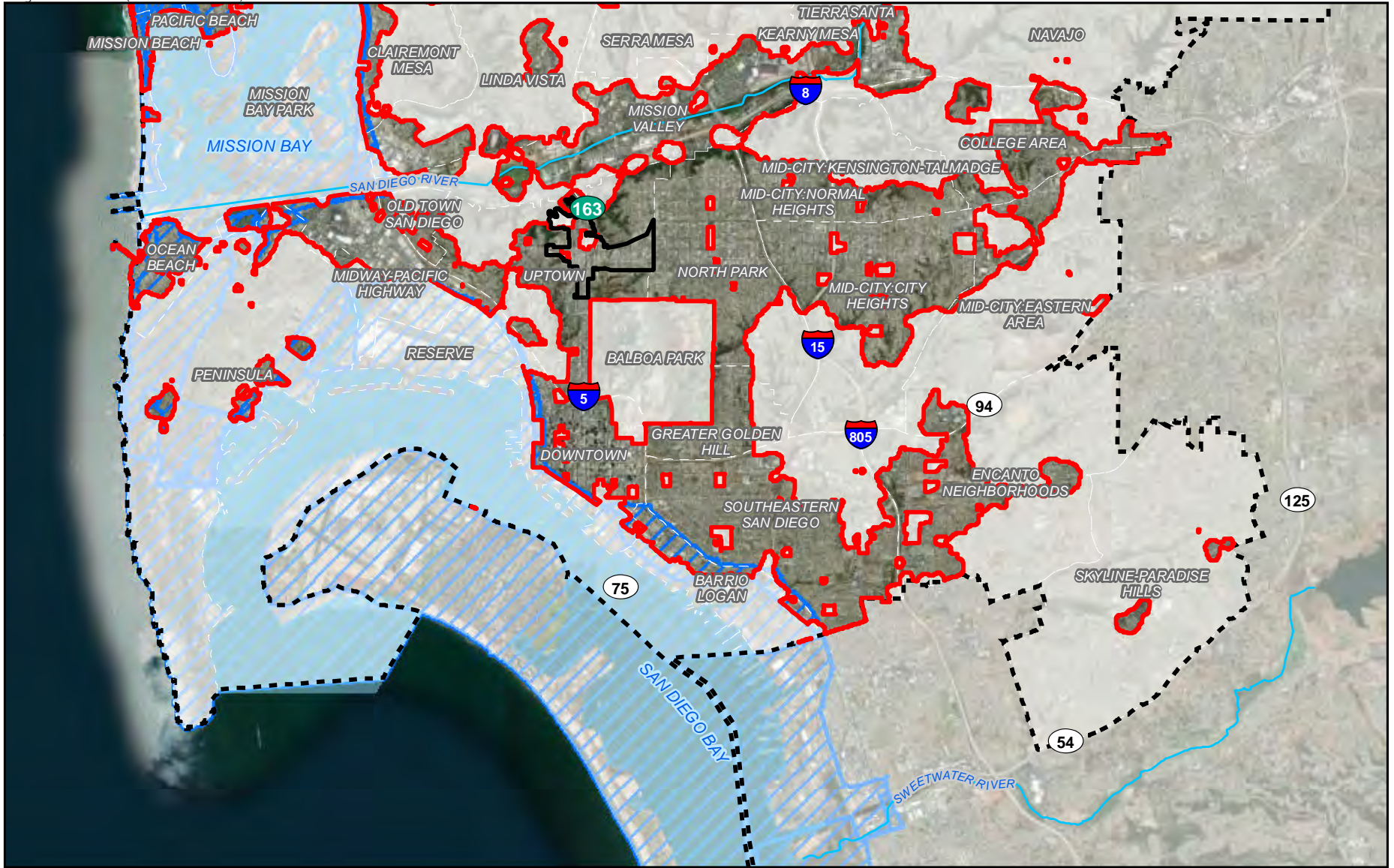




0 Miles 1.5 

FIGURE 4.10-13a  
Project Areas in Relation to the  
Local Coastal Plan Boundary - South





-  Hillcrest Focused Plan Amendment Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Coastal Zone

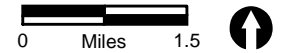


FIGURE 4.10-13b  
Project Areas in Relation to the  
Local Coastal Plan Boundary - South Central



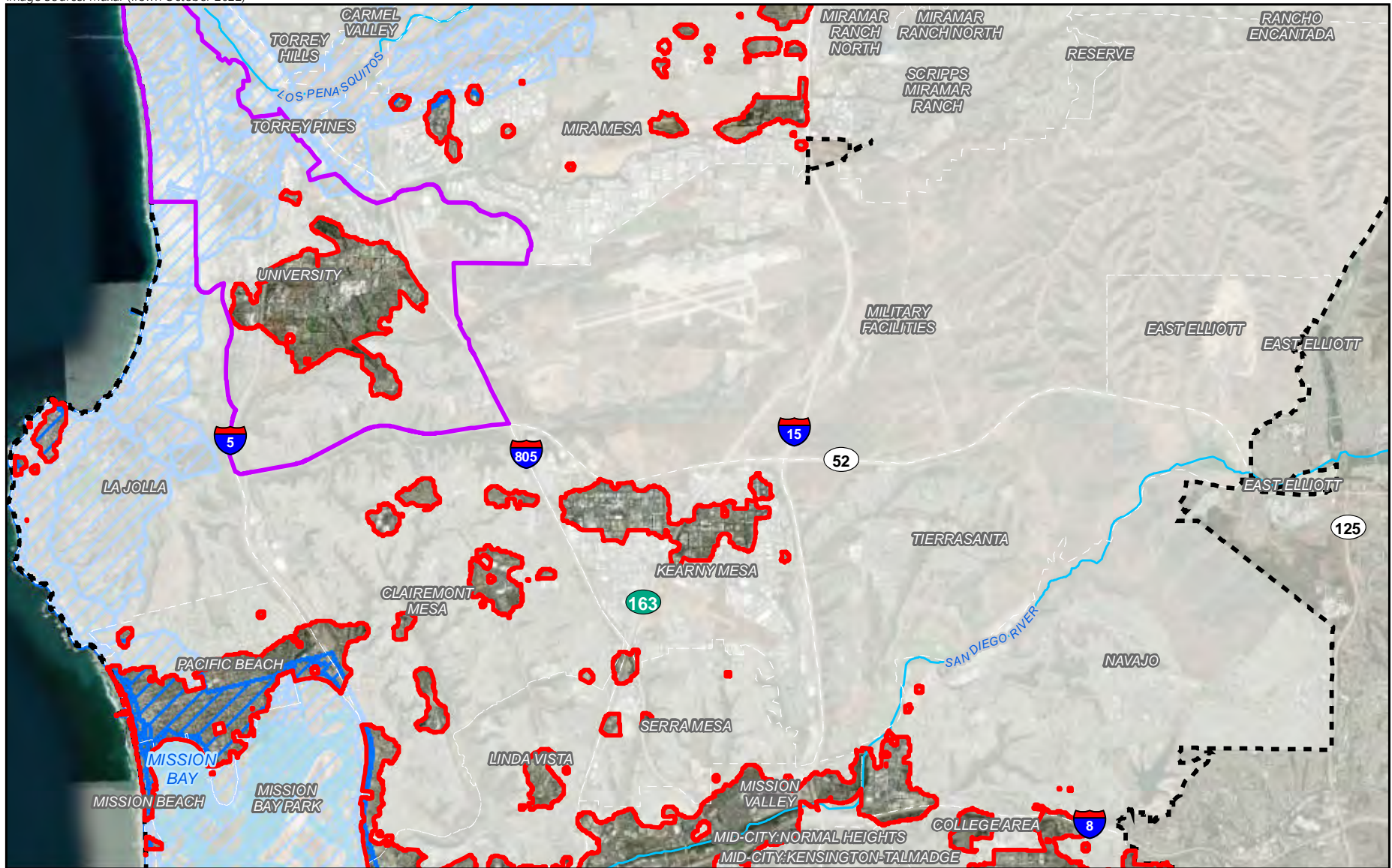
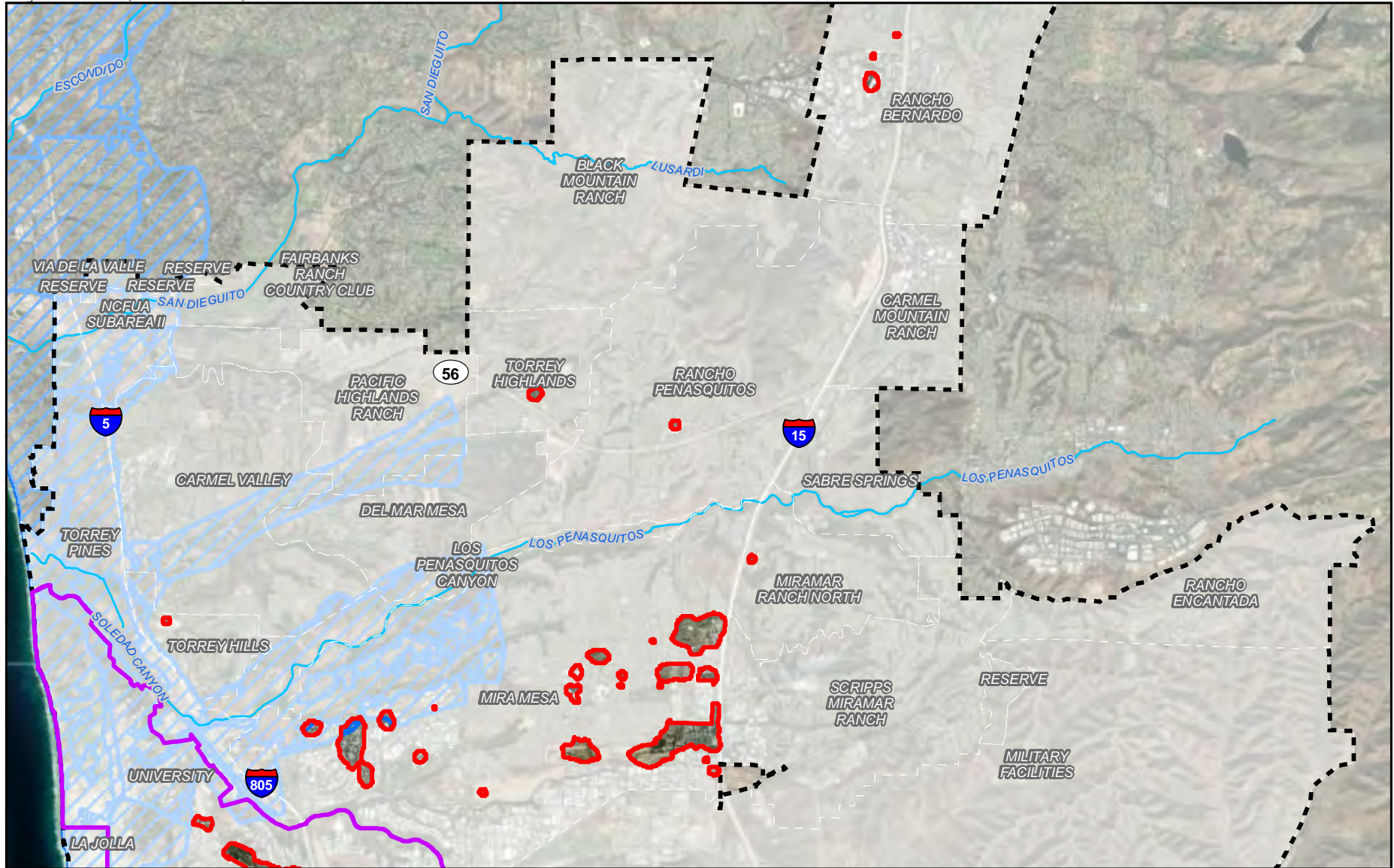






FIGURE 4.10-13c  
Project Areas in Relation to the  
Local Coastal Plan Boundary - North Central





-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Coastal Zone


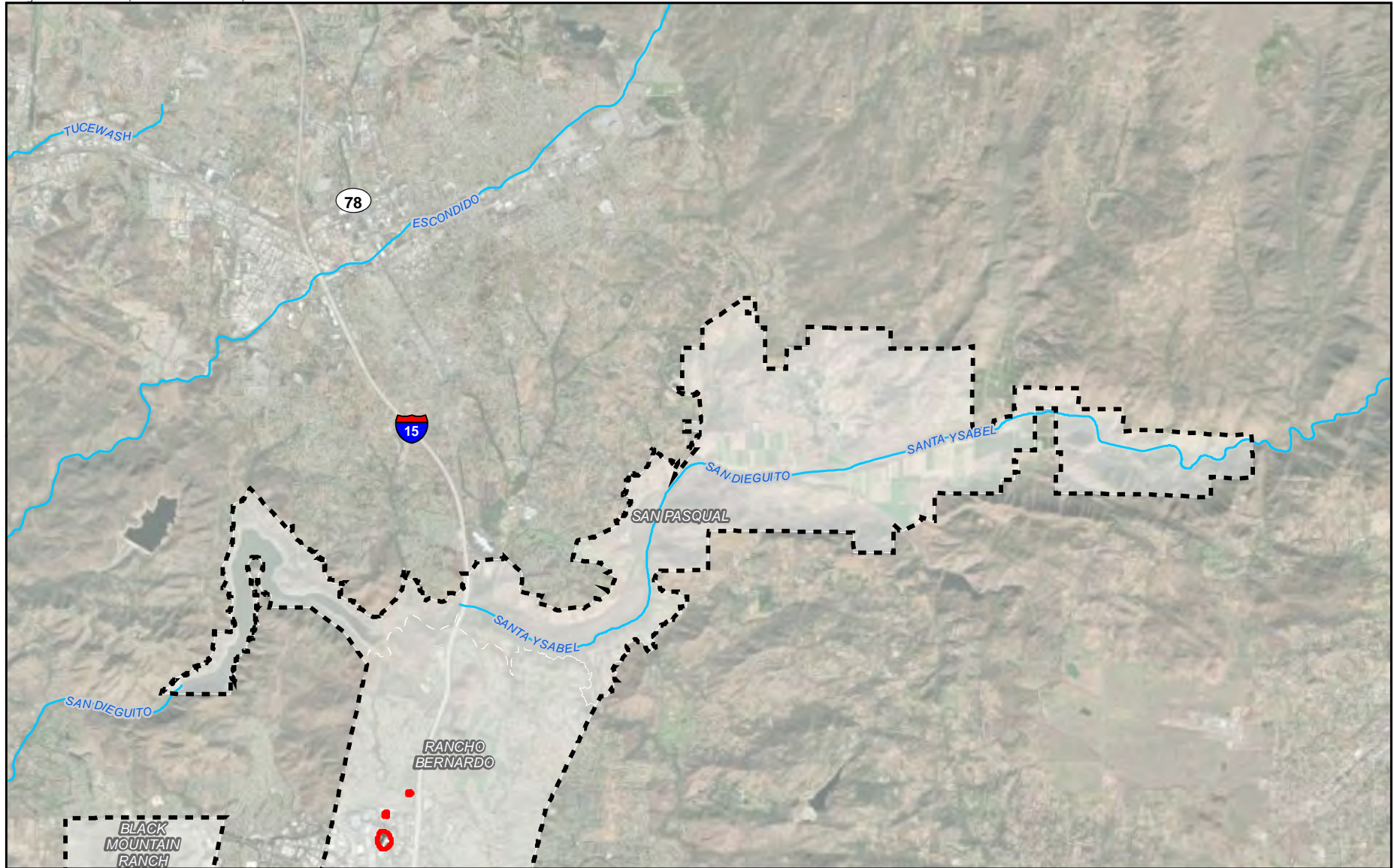


0 Miles 1.5 

FIGURE 4.10-13d  
Project Areas in Relation to the  
Local Coastal Plan Boundary - North





-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

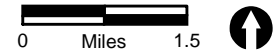


FIGURE 4.10-13e  
Project Areas in Relation to the  
Local Coastal Plan Boundary - Northeast





- Community Planning Area
- Coastal Zone

FIGURE 4.10-14

University Community Plan Update Area in Relation to the Local Coastal Plan Boundary

While flooding from sea level rise is not an existing condition, project development in the areas of the University Community Plan within the coastal zone may be influenced by sea level rise in the future. The increased potential for residential density within Climate Smart Village Areas could further expose people and property to sea level rise impacts. Nevertheless, as the University CPU would not conflict with adopted policies in the City's LCP, no conflicts with the LCP or Coastal Act have been identified. Therefore, the potential impacts related to conflicts with the Coastal Act would be less than significant.

## f. Multiple Species Conservation Program Subarea Plan

Implementation of Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be consistent with the City's MSCP SAP at a program level of review as development is planned in primarily urbanized locations and within areas not planned for conservation. Within the University CPU area, MHPA boundary line corrections are proposed to add lands into the MHPA, increasing overall conservation (see Section 3.5.3.1e). No policy revisions are proposed that would conflict with the MSCP. The project additionally anticipates future CPUs and plan amendments may be approved that are consistent with the General Plan policy framework and the Village Climate Goal Propensity map. Like previous CPUs adopted by the City, future CPUs and/or plan updates may include MSCP boundary line corrections (BLC) to remove land with no biological value (e.g., ~~disturbed or developed~~ lands) from the MHPA and/or to add land with equivalent or higher biological value to the MHPA. Boundary line corrections BLCs adjustments associated with future plan amendments would be pursued only if they meet the criteria for a boundary line correction BLC adjustments outlined in the MSCP SAP.

Additionally, as future development is implemented consistent with Blueprint SD Initiative, the Hillcrest FPA and the University CPU, development has the potential to occur within lands designated as MHPA or located adjacent to these lands. All future development would be required to demonstrate consistency with the MSCP SAPs for boundary line corrections BLCs and boundary line adjustments (~~BLAs~~) and adjacency guidelines. Furthermore, Wildlife Agency concurrence would be required for boundary line adjustments BLAs consistent with the City's MSCP Implementing Agreement. As detailed in the City's Biology Guidelines, any encroachment into the MHPA (in excess of the allowable encroachment by a project) would be ~~considered~~ significant and require a boundary line adjustment which would include a habitat equivalency assessment to ensure that what would be added to the MHPA is at least equivalent to what would be removed.

The MSCP establishes adjacency guidelines to be addressed on a project-by-project basis to minimize direct and indirect impacts and maintain the function of the MHPA. Consistent with the Biology Guidelines, the City requires the Land Use Adjacency Guidelines to be incorporated as project conditions of approval for any development adjacent to the MHPA, which would preclude indirect impacts to the MHPA. Therefore, despite the locations of individual development projects not being known at this time, potential impacts associated with conflicts with the MSCP would be less than significant as all future projects would be subject to consistency with these guidelines.

### **g. Vernal Pool Habitat Conservation Program**

The implementation of Blueprint SD Initiative and the University CPU include policy updates to each respective plan to reflect adoption of the City's VPHCP in 2018. Plan updates would be consistent with the VPHCP and carry forward key policies to support its implementation. Implementation of Blueprint SD Initiative and the University CPU anticipates future development primarily within Climate Smart Village Areas and the University CPU area that could result in development on or near vernal pools, although unlikely. In the event any vernal pool resources are identified on or adjacent to a site considered for development, requirements of the City's VPHCP would apply. VPHCP Avoidance and minimization measures detailed in Section 5.2.1 of the VPHCP in addition to MHPA land use adjacency requirements would apply to development adjacent to vernal pool resources to avoid indirect impacts. Any impacts to vernal pools would be evaluated for consistency with the VPHCP general conditions for compensatory mitigation and general management directives as detailed in Section 4.10.2.2h. With required compliance with the City's VPHCP and MSCP, impacts related to consistency with the VPHCP would be less than significant.

### **h. City of San Diego Climate Action Plan**

The implementation of Blueprint SD Initiative, the Hillcrest FPA and the University CPU would not conflict with implementation of the CAP, as it would be consistent with the CAP's goal of focusing new development in areas that would allow residents, employees and visitors to safely, conveniently and enjoyably travel as a pedestrian, or by biking, or transit, such as in TPAs, and areas of the city that support existing or planned transit.

The Blueprint SD Initiative land use framework is intended to increase the opportunity for homes and jobs near transit, especially in areas that contribute to the reduction of per capita VMT and GHG emissions. By aligning housing production with planned transportation investments, the updated citywide land use strategy intends to address the goals of the CAP. Blueprint SD Initiative identifies a land use strategy and complementary transportation policies to support GHG emissions reductions. In addition, the University CPU would encourage transit-oriented, mixed-use development centered around the Blue Line Trolley stops and other high-frequency transit services. The Hillcrest FPA would similarly provide the opportunity for additional homes and increased density near the employment center of the Medical Complex neighborhood to encourage active transportation and reduce automobile trips for work commutes. All development facilitated by these updates would be consistent with the City's Building Electrification policy, which requires new residential and commercial buildings to eliminate the use of natural gas, consistent with the CAP strategy to decarbonize the built environment. As further detailed in Section 4.7.4 Issue 2, through policy consistency with the six primary CAP strategies and the requirement for future development to be consistent with the CAP and the CAP Consistency Regulations, impacts related to CAP consistency would be less than significant.

### **i. Historical Resources Regulations**

As part of implementation of the Blueprint SD Initiative, future amendments to the LDC are anticipated to implement goals and policies of the General Plan. As detailed in Section 3.5.1.4, future LDC amendments may include updates to the HRR to further implement the City's vision as defined

by General Plan policy. Amendments to the HRR specifically pertaining to the University CPU area and Hillcrest FPA areas are discussed below.

### ***Blueprint SD Initiative***

The potential exists for historical resources to be present throughout the City, including within Climate Smart Village Areas. Due to the likely presence of historical resources in the Climate Smart Village Areas and other areas of the City, future development would be required to implement the HRR regulations to ensure historic resource evaluation and avoidance, where feasible. These regulations include requiring that development affecting designated historical resources or historical districts to provide full mitigation impacts to a significant resource, in accordance with the Historical Resources Guidelines of the Land Development Manual, as a condition of approval. If development cannot to the maximum extent feasible comply with the development regulations for historical resources, then the approval and issuance of a Site Development Permit in accordance with Process Four is required. Due to the requirement for compliance with the Historic Resources Regulations in all circumstances, impacts related to conflicts with these regulations would be less than significant. Refer to Section 4.4.4 for further discussion of impacts and Section 4.4.6 for mitigation applicable to cultural resources.

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

A focus of the Hillcrest FPA is the proposal for a new LGBTQ+ Cultural District in Hillcrest as detailed in Section 3.5.2.4. A cultural district is an area of the city formally recognized for its history, people, events, and culture. The proposed Hillcrest LGBTQ+ Cultural District is outside the scope of the HRR. However, the Hillcrest FPA also includes amendments to the CPIOZ including identifying a CPIOZ-Type A which would govern development of a potential Historic District. Within this CPIOZ-Type A area, upon designation as a historic district, SDRs would apply to supplement the Historical Resources Regulations in Chapter 14, Article 3, Division 2 of the SDMC. The purpose of the SDRs is to preserve the essential historic features and characteristics important to the significance of the potential Hillcrest Historic District while providing a clear path for new development. SDRs would apply within an area centered around University and Fifth avenues located in the heart of the Hillcrest community (see Figure 3-18). The proposed SDRs associated with the Hillcrest Historic District would implement the HRR by defining specific development regulations to ensure preservation of the essential historic features and characteristics important to the significance of the Hillcrest Historic District while providing a clear path for new development. Refer to Section 3.5.2.11b for details on the Hillcrest Historic District. As the potential Historic District and SDRs would implement and supplement the Historic Resources regulations, no conflict would result and impacts would be less than significant.

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

The project includes amendments to the HRR specifically within the University CPU as detailed in Section 3.5.3.1f. Based on the results of the Historic Context Statement (see Appendix B) and Focused Reconnaissance Survey (see Appendix C), the project includes revisions to the City's Historical Resources Guidelines to exempt certain master-planned communities within the University Community from historic review under SDMC Section 143.0212. Changes to historic structures within University master-planned communities including La Jolla Colony, University Hyde

Park, San Clemente Park Estates, University City West A, and University City West B are identified as Tier I communities and would require further study to determine historic significance consistent with SDMC Section 143.0212. The proposed amendment to the Historical Resources Guidelines of the City's Land Development Manual would exempt all remaining non-Tier I master-planned communities depicted on Figure 3-29 from potential historic review under SDMC Section 143.0212. The proposed amendment would be consistent with the City's HRR because the determination to exempt certain master-planned communities from further review is supported by findings that certain master-planned communities do not qualify as a historical resource, as detailed in the University Community Plan Area Focused Reconnaissance Survey (see Appendix C). See also Section 4.4.4, Issue 1 for additional discussion of the historical evaluation of master-planned communities. The proposed amendments to the HRR would not conflict with any land use plans, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Impacts would be less than significant.

## **j. Airport Land Use Compatibility Plans**

Development of the land use framework outlined in the Village Climate Goal Propensity map was developed with consideration to areas that would be incompatible with increased residential densities. Specifically, as detailed in the Blueprint Methodology Documentation (see Attachment A of Appendix J), a number of exclusion areas were identified in the model, including airport land use compatibility plan safety zone exclusions. No development assumptions were modeled within these areas, ensuring that the Climate Smart Village Areas would be compatible with ALUCP safety zones. Despite the exclusion of certain safety zones, certain land within the Climate Smart Village Areas are located within Review Area 1 of certain airports. Land use changes within these areas would require an ALUC determination, at the time land use amendments are proposed. As future Community Plan updates are proposed for consistency with the Village Climate Goal Propensity map, additional community level review and ALUC consistency determinations may be required if land use changes are proposed within Review Area 1 of an ALUCP.

Similarly, the proposed land use maps within University CPU and the Hillcrest FPA were developed with consideration to airport safety and Federal Aviation Regulation height limitations and safety zones. Land use change within the University CPU area is proposed within the MCAS Miramar ALUCP Review Area 1. Within the Hillcrest FPA, land use change is within the North Island NAS Station Review Area 1. As future site-specific projects are proposed, at the project level review, an ALUC consistency determination would be requested for these areas. For future potential land use changes under the Blueprint SD Initiative, while the model excludes certain airport safety zones; future development anticipated under the project may occur in the vicinity of airports, requiring airport review and FAA noticing.

Future development consistent with the Village Climate Goal Propensity Map, the Hillcrest FPA, and the University CPU may also occur within noise compatibility zones. Applicable noise compatibility policies would apply as implemented through the City's land use plans and zoning regulations, specifically the Airport Approach Overlay Zone, Airport Environs Overlay Zone, and Airport Land Use Compatibility Overlay Zone. Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be consistent with ALUCPs and no conflict with ALUCP policies or regulations

would occur as future development projects within applicable areas would continue to be subject to applicable ALUCP review. Impacts would be less than significant.

## **k. Affordable Housing Regulations**

As detailed in Section 4.10.2.2f, the City implements State Density Bonus Law through its Affordable Housing Regulations (SDMC Chapter 14, Article 3, Division 7). Future development within City, both within and outside of Climate Smart Village Areas, may use the Affordable Housing Regulations to obtain density bonus allowances. Future development may qualify for waivers and/or incentives that allow for deviations to City development regulations such as increases in allowable height and/or floor area ratios, which can result in development allowances in excess of City base zone regulations. Notwithstanding required consistency with land use plans, it is noted that a project that can demonstrate compliance with the Affordable Housing Regulations may deviate from other City polices or regulations. As specified in the SDMC Section 143.0740(c)(1)(C) as it relates to incentives and SDMC Section 143.0743(b)(3) as it relates to waivers, requested waivers and incentives shall be analyzed in compliance with CEQA, and no waiver shall be granted without such compliance. Implementation of the project would not conflict with the City's Affordable Housing Regulations because it would not affect the ability of future projects to apply the regulations on a project basis. The potential effects of the application of waivers and/or incentives would also be reviewed in the context of Issue 3, below.

As part of the University CPU, SDR would be implemented which requires development of residential or mixed-use development to either satisfy the City's Affordable Housing Regulations or pay the Inclusionary In Lieu Fee as specified in SDMC Section 142.1305(a) (4), plus provide a certain number of affordable units (see Section 3.5.3.a, for details of the proposed SDRs in the University CPU area). Like the discussion above, any use of the City's Affordable Housing Regulations including deviations from other City polices or regulations would be reviewed in the context of Issue 3.

## **Issue 3 Deviation or Variance**

*Would the project require a deviation or variance, and the deviation or variance would in turn result in a physical impact on the environment?*

As the proposed actions are planning and policy level actions, no deviations or variances are proposed. However, future development consistent with the proposed plans may propose deviations or variances. In addition to deviations and variances allowed pursuant to the SDMC regulations, the Affordable Housing Regulations discussed under Issue 2 may be applied to future development throughout the City, including within the University CPU area with implementation of the Affordable Homes Requirement (SDR-J.1). The application of waivers and/or incentives associated with the Affordable Housing Regulations could allow for deviations to City development regulations such as increases in allowable height and/or floor area ratios, which can result in development allowances in excess of City base zone regulations and in excess of densities envisioned under the Village Climate Goal Propensity Map.

As future site-specific projects are proposed, at the project level review, the City requires identification and analysis of all deviations and variances to ensure they are compatible with City



policy. As part of this review, the potential for adverse environmental impacts are considered. For example, a variance to allow a retaining wall in excess of City height limitations would be evaluated for potential visual impacts. Where needed, landscape screening or other design measures may be required to ensure the variance does not result in an impact on the environment. The City's LDC requires certain findings to be made that demonstrate support for proposed deviations or variances. For example, deviations from the City's ESL regulations are allowed provided specified findings can be made as detailed in SDMC Section 126.0505. Variance findings required for approval are identified in SDMC Section 126.0805. If findings cannot be supported by the City, the deviation or variance would not be approved.

~~Future development projects that qualify for incentives and/or waivers in exchange for affordable housing may result in increases in development intensities beyond those included in applicable land use plans including the University CPU, Hillcrest FPA, and the Village Climate Goal Propensity Map. Future build-out within the City consistent with the Blueprint SD Initiative is anticipated to include housing processed under the Affordable Housing Regulations and other affordable housing density bonus programs.; however, tThe impacts of waivers and/or incentives associated with discretionary affordable housing applications would need to be evaluated on a project-by-project basis. At the project level, future development would require compliance with design standards included in applicable community plans to ensure the visual effects of waivers or incentives are offset through design. However, with increases in development intensities anticipated primarily throughout Climate Smart Village Areas, there would be a resultant potential for increased height and intensities to be allowed under the Affordable Housing Regulations and other affordable housing density bonus programs as base zone regulations are updated for consistency with the Village Climate Goal Propensity Map. Such increases in development intensities could result in larger structures, increased height, and associated visual impacts. The University CPU SDR-J-1 adds additional requirements for project compliance with the Inclusionary Affordable Housing Regulations set forth in Chapter 14, Article 2, Division 13 of the . The implementation of such waivers and incentives and onsite and offsite construction related to the City's Inclusionary Affordable Housing Regulations in addition to the University CPU SDR-J-1 could result in significant impacts related to views, shading and other aesthetic impacts; however, significant impacts related to conflicts with the affordable housing regulations are not anticipated due to the fact that the SDMC requires compliance with specific findings in order to authorize waivers and/or incentives under these regulationsMandatory compliance with Affordable Housing Regulations and would preclude significant impacts as only those deviations or variances that can meet applicable findings would be permitted. Therefore, impacts related to the issuance of deviances or variances would be less than significant due to required compliance with the Affordable Housing Regulations and required project-specific findings prior to issuance of any variances or deviations. Future development projects that provide affordable housing may be entitled to incentives and waivers under the City's Affordable Housing Regulations and other affordable density bonus programs. Incentives and waivers allow for deviation from development regulations, unless the City makes required findings to deny the incentive and/or waiver. Impacts resulting from the City's Affordable Housing Regulations and other affordable housing density bonus programs have been addressed as part of the environmental review associated with the adoption of the regulations. For example, the environmental analysis in the Final PEIR for Complete Communities: Housing Solutions and Mobility Choices anticipated that future development that complied with the Complete Communities~~

Housing Solutions Regulations would be entitled to incentives and waivers which permitted deviations from the City's development regulations. Thus, impacts would be less than significant.

## Cumulative Analysis

As discussed in this section, future development facilitated by implementation of the Blueprint SD Initiative, the University CPU and the Hillcrest FPA would be consistent with and would expand on implementation of the General Plan City of Villages strategy. Future development would be required to demonstrate consistency with applicable regulations such as the ESL Regulations and MSCP SAP and airport land use compatibility policies and regulations. Any future development within the Climate Smart Village Areas that is identified to encroach into ESL would be subject to review in accordance with the ESL Regulations (LDC Section 143.0101 et seq.). Based on the compatibility of the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA with the General Plan policy framework and other applicable land use plans and regulations, cumulative land use compatibility impacts would be less than significant.

### 4.10.5 Significance of Impacts

#### 4.10.5.1 Physical Division of Community

Overall policy changes related to mobility are intended to support community accessibility and connectivity by all. Implementation of the proposed planning and policy framework defined by the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA, would avoid physical division of community. Therefore, impacts would be less than significant.

#### 4.10.5.2 Conflict with Applicable Plans

Implementation of Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would be consistent with the City's overarching policy and regulatory documents including the General Plan and SDMC. Additionally, updates to mobility policies would help achieve consistency with the Regional Plan. The Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would be consistent with applicable environmental goals, objectives, or guidelines of the SANDAG Regional Plan, the General Plan and General Plan Noise Element, Environmentally Sensitive Lands Regulations, California Coastal Act, the MSCP SAP, the VPHCP, CAP, HRR, ALUCPs, and affordable housing regulations. Therefore, impacts would be less than significant.

#### 4.10.5.3 Deviation or Variance

As the proposed actions are planning and policy level actions, no deviations or variances are proposed. However, future development consistent with the proposed plans may propose deviations or variances. If findings cannot be supported by the City, the deviation or variance would not be approved. Similarly, the City may approve waivers and/or incentives under the Affordable Housing Regulations and other affordable density bonus programs; however, impacts resulting from the City's Affordable Housing Regulations and other affordable housing density bonus programs have been addressed as part of the environmental review associated with the adoption of the

regulations. Therefore, with application of the City's LDC that require specified findings to be made prior to approval of any deviation or variance, impacts resulting from deviations or variances associated with future development anticipated by the project, would be less than significant.

## **4.10.6 Mitigation, Monitoring and Reporting**

### **4.10.6.1 Physical Division of Community**

Impacts related to physical division of community would be less than significant; therefore, no mitigation is required.

### **4.10.6.2 Conflict with Applicable Plans**

Impacts would be less than significant; therefore, no mitigation is required.

### **4.10.6.3 Deviation or Variance**

With application of the City's LDC, physical impacts resulting from deviations or variances associated with future development anticipated by the project would be less than significant; therefore, no mitigation is required.

## 4.11 Noise

This section addresses the potential noise impacts that would result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (CPU) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

### 4.11.1 Existing Conditions

#### 4.11.1.1 Fundamentals of Noise

Sound propagation (i.e., the passage of sound from a noise source to a receiver) is influenced by several factors including the distance from the source, geometric spreading, ground absorption and atmospheric effects, as well as shielding by natural and/or manmade features. Noise is defined as unwanted or annoying sound that interferes with or disrupts normal human activities. The response of different individuals to similar noise events is diverse and is influenced by the type of noise, perceived importance of the noise, its appropriateness in the setting, time of day, type of activity during which the noise occurs, and sensitivity of the individual.

Sound characteristics include the sound power which relates to the source of the sound and sound pressure which is the sound received at a receptor. Sound power is the amount of energy of sound at the source. Sound pressure is the pressure vibrations caused by the source but perceived at the ear.

Noise descriptors used in this section are the decibel (dB), A-weighted decibel [dB(A)], 1-hour average-equivalent noise level ( $L_{eq}$ ), and the community noise equivalent level (CNEL). The hourly equivalent sound level ( $L_{eq}$ ) is the average dB(A) sound level over a 1-hour period. A-weighting is a frequency correction that often correlates well with the subjective response of humans to noise. The CNEL is a 24-hour average A-weighted decibel sound level that incorporates a 5 dB(A) penalty to sound levels occurring between 7:00 p.m. and 10:00 p.m., and 10 dB(A) penalty to sound levels occurring between 10:00 p.m. and 7:00 a.m. The additional 5 dB(A) and 10 dB(A) penalties during evening and nighttime hours, respectively, are intended to account for the added sensitivity of humans to noise during these time periods. CNEL values are typically used in land use planning to evaluate the compatibility of adjacent land uses. The subsections below further describe elements and measures of noise.

## **a. Frequency and Hertz**

A continuous sound can be described by its frequency (pitch) and its amplitude (loudness). Frequency relates to the number of pressure oscillations per second. Low-frequency sounds are low in pitch, like the low notes on a piano, whereas high-frequency sounds are high in pitch, like the high notes on a piano. Frequency is expressed in terms of oscillations, or cycles, per second. Cycles per second are commonly referred to as Hertz (Hz). High frequencies are sometimes more conveniently expressed in units of kilo-Hertz (kHz) or thousands of Hz. The extreme range of frequencies that can be heard by the healthiest human ear spans from 16 to 20 Hz on the low end to about 20,000 Hz (or 20 kHz) on the high end.

## **b. Sound Pressure Levels and Decibels**

The amplitude of a sound determines its loudness. Sound pressure levels are described in units called decibels. Decibels are measured on a logarithmic scale that quantifies sound intensity in a manner similar to the Richter scale used for earthquake magnitudes. Thus, a doubling of the energy of a noise source, such as doubling of traffic volume, would increase the noise level by 3 dB; a halving of the energy would result in a 3 dB decrease.

## **c. A-weighted Decibels**

The human ear is not equally sensitive to all frequencies within the sound spectrum. Human hearing is limited not only in the range of audible frequencies but also in the way it perceives the sound in that range. In general, the healthy human ear is most sensitive to sounds between 1,000 Hz and 5,000 Hz, and it perceives a sound within that range as more intense than a sound of higher or lower frequency with the same magnitude. To approximate the frequency response of the human ear, a series of sound level adjustments is usually applied to the sound measured by a sound level meter.

The A-scale weighting network approximates the frequency response of the average healthy ear when listening to most ordinary sounds. When people make judgments of the relative loudness or annoyance of a sound, their judgments correlate well with the A-scale sound levels of those sounds. Noise levels for traffic noise reports are typically reported in terms of dB(A).

Under controlled conditions in an acoustics laboratory, the trained, healthy human ear is able to discern changes in sound levels of 1.5 dB(A) under certain conditions. Outside such controlled conditions, the average healthy ear can barely perceive a change of 3 dB(A); a change of 5 dB(A) is readily perceptible; and an increase (decrease) of 10 dB(A) sounds twice (half) as loud.

## **d. Noise Descriptors**

The two noise metrics used in the analysis are the  $L_{eq}$  and the CNEL.

### ***Equivalent Noise level***

The  $L_{eq}$  is also referred to as the time-average sound level. It is the equivalent steady state sound level which, in a stated period of time, would contain the same acoustical energy as the time-varying

sound level during the same time period. The period of time averaging may be specified;  $L_{eq(3)}$  would be a three-hour average. When no period of time is specified, a one-hour average is assumed. The one-hour A-weighted equivalent sound level is the energy average of the A-weighted sound levels occurring during a one-hour period. It is important to understand that noise of short duration, which is substantially less than the averaging period, is averaged into ambient noise during the period of interest. Thus, a loud noise lasting many seconds or a few minutes may have minimal effect on the measured sound level averaged over a one-hour period.

### ***Community Noise Equivalent Level***

People are generally more sensitive and annoyed by noise occurring during the evening and nighttime hours. The CNEL scale represents a time-weighted 24-hour average noise level based on the A-weighted sound level. The CNEL accounts for the increased noise sensitivity during the evening (7:00 p.m. to 10:00 p.m.) and nighttime hours (10:00 p.m. to 7:00 a.m.) by adding 5 and 10 dB(A), respectively, to the average sound levels occurring during these hours.

#### **4.11.1.2 Vibration**

Vibrations are movement of the ground or air caused by explosions, construction work, railway and road transport, or other forces causing the earth to move. Vibration levels and their corresponding effects are measured in terms of peak particle velocity (PPV). Construction activities such as pile driving, demolition activities, blasting, and other earth-moving operations have the potential to cause ground vibrations that may cause structural damage to adjacent buildings. Unless there are extreme flaws in pavement surfaces, heavy truck traffic on busy roadways rarely creates vibrations strong enough to cause damage, though occasionally can generate human annoyance. Transient vibration impacts to buildings vary depending on the type and structural integrity of the buildings. According to the Swiss Association of Standardization Vibration Damage Criteria, transient vibration limits are a little more than double the continuous vibration limits (California Department of Transportation 2013).

#### **4.11.1.3 Typical Noise Sources**

Noise at excessive levels can affect the environment and quality of life. Noise is subjective since it is dependent on the listener's reaction, the time of day, distance between source and receptor, and its tonal characteristics. At excessive levels, people typically perceive noise as being intrusive, annoying, and undesirable.

The most prevalent noise sources in the City of San Diego are from motor vehicle traffic on interstate freeways, state highways, and local major roads generally due to higher traffic volumes and speeds. Aircraft noise is also present in many areas of the City. Rail traffic and industrial and commercial activities contribute to the noise environment. The following are descriptions of typical sources in the City.



### **a. Ambient Levels and Existing Noise Sources**

The City is primarily a developed and urbanized city, and an elevated ambient noise level is a normal part of the urban environment. However, controlling noise at its source to acceptable levels can make a substantial improvement in the quality of life for people living and working in the City. When this is not feasible, the City applies additional measures to limit the effect of noise on future land uses, which include spatial separation, site planning, and building design techniques that address noise exposure and the insulation of buildings to reduce interior noise levels (City of San Diego 2015).

### **b. Commercial and Mixed-Use Activity**

Several other noise sources exist in the City of San Diego. Noise generated commercial activity including operations, maintenance, truck deliveries, vehicular traffic, and high pedestrian traffic can affect adjacent noise sensitive uses and aboveground floor residential uses in mixed use buildings. Bars, restaurants, entertainment activities, events, and other facilities, which are active after 7:00 p.m. contribute to an urban noise environment that can affect residential or other sensitive land uses. City noise ordinances and existing construction guidelines both limit hours of operation and require noise level attenuation methods for continued operations to minimize the effect of noise on adjacent/above residential or sensitive land uses.

### **c. Industrial Activity**

Industrial activity, like commercial activity, can be a source of noise, which can affect sensitive land uses in the City. The degree of noise generated by industrial uses is dependent upon various factors, including type of industrial activity, hours of operation, and the location relative to other land uses. In addition to traffic-related noises induced by industrial operations, on-site machinery can contribute to the ambient noise environment. Outdoor truck activity, air compressors, and generators are potential noise sources associated with industrial use that can interfere with noise-sensitive uses, which include residential uses. Like commercial activity, the City can monitor noise levels produced by industrial activity and enforce the Noise Abatement and Control Ordinance in order to reduce noise levels to acceptable levels, where sensitive receptors are impacted.

### **d. Construction Noise**

Construction can be another major, although typically short-term, source of noise. Construction is of most concern when it takes place near noise-sensitive land uses, occurs at night or in the early morning hours. Noise during construction can also affect wildlife. As discussed above, the City typically regulates noise associated with construction equipment and activities through the enforcement of noise ordinance standards, implementation of General Plan policies, and imposition of conditions of approval for permits.

### **e. Event Activity**

Large events, including sports and special events, occur intermittently throughout the year, which offer entertainment opportunities, but can also generate high noise levels at their source. Specific

venues such as Petco Park, Rady's Shell, or other outdoor concert locations are designed to accommodate events that produce high noise levels. In addition, the City can permit special events throughout the City, although typically on City streets or parks. Special event sponsors are required to adhere to the City's Special Event Ordinance, which limits the hours of event operation and noise levels depending on conditions such as specific locations, surrounding land uses, and public benefit.

#### **f. Refuse Vehicles, Parking Lot Sweepers, and Public Activity**

Refuse vehicle and parking lot sweeper activity in all land use areas will temporarily elevate noise levels. Refuse vehicle and parking lot sweeper activities are necessary and noise control of these activities is limited. In an urban environment, excessive public noise such as barking dogs, leaf blowers, loud music, or car alarms can be disturbing, excessive, annoying, or offensive and cause discomfort or annoyance. The City's Noise Abatement and Control Ordinance addresses and limits excessive noise from these activities.

#### **g. Motor Vehicle Traffic Noise**

Motor vehicle traffic noise is a major contributor of noise within the City. Excessive noise levels along arterial roads, interstate freeways, and state highways affect much of the urban environment. Traffic noise level is dependent upon traffic volume, speed, flow, vehicle mix, pavement type and condition, the use of barriers, as well as distance to the receptor.

#### **h. Trolley and Train Noise**

Daily traffic from passenger and freight train and trolley operations produces noise that may disrupt adjacent noise-sensitive uses. Within the project areas there are both existing and planned rail improvements that could contribute to noise and vibration. Trains and trolleys can generate high, yet relatively brief, intermittent noise events. The interaction of the steel wheels and rails is a major component of train noise. Factors that influence the overall rail noise include the train speed, train horns, type of engine, track conditions, use of concrete cross ties and welded track, the intermittent nature of train events, time of day, and sound walls or other barriers. When operating in residential areas, trains are required to travel at a reduced speed to minimize noise.

Federal regulations require trains to sound their horns at all roadway-rail grade crossings and the warning sound of train horns is a common sound experienced by communities near the rail corridor. In an effort to minimize excess train horn noise, the federal government allows local jurisdictions to establish train horn "quiet zones." This requires the implementation of supplementary and alternative safety measures to compensate for the loss of the train horn usage.

The state is planning for high-speed rail service that would connect the San Diego region to other regions in the state. Air turbulence noise generated from high-speed train traffic may affect noise-sensitive uses along the potential rail corridors.

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### **4.11.1.3 Noise Characteristics**

#### **a. Blueprint SD Initiative**

Future development in accordance with the Blueprint SD Initiative would occur throughout the City, but primarily within areas that are closer to urban centers and existing or future transit amenities. Future development under the Blueprint SD Initiative could be affected by a variety of noise sources including those detailed in Section 4.11.1.3. Trolley and train noise, motor vehicle noise, and noise from commercial and mixed-use activities would affect the Climate Smart Village Areas.

#### **b. Hillcrest Focused Plan Amendment**

Existing noise sources in the Hillcrest FPA area are transportation and stationary sources. Transportation noise sources include vehicle traffic and noise associated with aircrafts approaching and departing from the San Diego International Airport. Stationary noise sources include industrial and commercial operations. In the Hillcrest FPA area, the mixed-use character and land use intensity results in the juxtaposition of residents and more active, noisy uses due to foot traffic, restaurants, bars, and nightlife activities.

#### **c. University Community Plan Update**

The primary sources of noise in the University CPU area come from vehicular traffic on local roads and freeways, as well as military aircraft noise. Most notable, the Marine Corps Air Station Miramar noise affects portions of the University CPU area.

## **4.11.2 Regulatory Setting**

### **4.11.2.1 Federal Regulations**

#### **a. U.S. Code of Federal Regulations, Procedures for Abatement of Highway Traffic Noise and Construction Noise**

The federal government establishes noise criteria for interstate freeways and airports. Federal highway noise abatement and evaluation policies are contained in the U.S. Code of Federal Regulations (CFR), 23 CFR Part 772, Procedures for Abatement of Highway Traffic Noise and Construction Noise. As defined in 23 CFR 772, Section 772.5(g), traffic noise impacts occur when the predicted traffic noise levels approach or exceed the noise abatement criteria (NAC) or when predicted traffic noise levels substantially exceed the existing noise levels. The numerical criteria used in California to define “approach the NAC” and “substantially exceed the NAC” are stated in Table 4.11-1 below.

Table 4.11-1 Federal Highway Administration Noise Abatement Criteria			
Activity Category	Hourly A-Weighted Sound Level (1) (dB(A))		Description of Activity Categories
	L <sub>eq(H)</sub>	L <sub>10(h)</sub>	
A	57 (Exterior)	60 (Exterior)	Lands in which serenity and quiet are of extraordinary significance and serve an important public need, and where the preservation of those qualities is essential if the area is to continue to serve its intended purpose.
B	67 (Exterior)	70 (Exterior)	Picnic areas, recreation areas, playgrounds, active sport areas, parks, residences, motels, hotels, schools, churches, libraries, and hospitals.
C	72 (Exterior)	75 (Exterior)	Developed lands, properties, or activities not included in Categories A or B above.
D	--	--	Undeveloped lands.
E	52 (Interior)	55 (Interior)	Residences, motels, hotels, public meeting rooms, schools, churches, libraries, hospitals, and auditoriums.

<sup>1</sup>Either L<sub>10(h)</sub> or L<sub>eq(h)</sub> (but not both) may be used on a project.  
<sup>2</sup>SOURCE: 23 CFR 772

For interstate freeway and airport projects, if a noise impact is identified, abatement measures must be considered. In determining and abating traffic noise impacts, primary consideration is to be given to exterior areas. Abatement will usually be necessary only where frequent human use occurs and a lowered noise level would be of benefit. Federal Highway Administration (FHWA) criteria also state that where there are no exterior activities to be affected by the traffic noise, or where the exterior activities are far from or physically shielded from the roadway in a manner that prevents an impact on exterior activities, the interior criterion shall be used as a basis of noise impacts.

## b. Federal Transit Administration Transit Noise and Vibration Impact Assessment Manual

The Federal Transit Administration (FTA) provides criteria for acceptable levels of groundborne vibration for various types of buildings. Structures amplify groundborne vibration; wood-frame buildings, such as typical residential structures, are more affected by ground vibration than heavier buildings. The level at which groundborne vibration is strong enough to cause architectural damage has not been determined conclusively, but the standards recommended by the FTA are shown in Table 4.11-2.

Table 4.11-2 Construction Vibration Damage Criteria		
Building/Structural Category	PPV (in/sec)	Approximate VdB
I. Reinforced-concrete, steel, or timber (no plaster)	0.5	102
II. Engineered concrete and masonry (no plaster)	0.3	98
III. Non-engineered timber and masonry buildings	0.2	94
IV. Buildings extremely susceptible to vibration damage	0.12	90

SOURCE: FTA 2018  
PPV = peak particle velocity; in/sec = inch per second; VdB = vibration decibel

The FTA also provides guidance for assessing vibration impacts from railroad operations. The criteria for determining the significance of impacts are presented in Table 4.11-3.

<b>Table 4.11-3 Guidelines for Determining the Significance of Groundborne Vibration and Noise Impacts</b>						
Land Use Category	Groundborne Vibration Impact Levels (VdB re 1 micro-inch per second)			Groundborne Noise Impact Levels (dB re 20 micro Pascals)		
	Frequent Events	Occasional Events	Infrequent Events	Frequent Events	Occasional Events	Infrequent Events
Category 1: Buildings where low ambient vibration is essential for interior operations (research & manufacturing facilities with special vibration constraints)	65 VdB	65 VdB	65 VdB	N/A	N/A	N/A
Category 2: Residences and buildings where people normally sleep (hotels, hospitals, residences, & other sleeping facilities)	72 VdB	75 VdB	80 VdB	35 dB(A)	38 dB(A)	43 dB(A)
Category 3: Institutional land uses with primarily daytime use (schools, churches, libraries, other institutions, & quiet offices)	75 VdB	78 VdB	83 VdB	40 dB(A)	43 dB(A)	48 dB(A)
SOURCE: FTA 2018. VdB = vibration decibel; re = relative; N/A = not applicable "Frequent Events" is defined as more than 70 vibration events per day. Most rapid transit projects fall into this category. "Occasional Events" is defined as 30 to 70 vibration events per day. Most commuter trunk links fall into this category "Infrequent Events" is defined as fewer than 30 vibration events per day. This category includes most commuter rail systems.						

For Category 1 uses such as vibration sensitive equipment, the screening distance from the right-of-way is 600 feet. For Category 2 land uses such as residences and buildings where people would normally sleep, the screening distance is 200 feet. The screening distance for Category 3 land uses such as institutional land uses with primarily daytime uses, is 120 feet.

### **c. U.S. Department of Housing and Urban Development Noise Guidebook**

The U.S. Department of Housing and Urban Development (HUD) requires that noise analysis and mitigation be provided in accordance with the HUD Noise Guidebook for projects receiving HUD funding. Minimum attenuation requirements are prescribed in Title 24 of the CFR (24 CFR 51.104(a)) which are the HUD Environmental Criteria and Standards.

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#### **d. Federal Aviation Administration, Part 150**

The Federal Aviation Administration oversees the development of voluntary studies of noise exposure and land use compatibility studies prepared by airport operators as prescribed in Title 14 of the CFR, Part 150. Part 150 studies identify existing noise exposure, identify potential future noise exposure, and evaluate various alternatives to reduce the number of people affected by aircraft noise. The studies also provide recommendations as to viable noise abatement/mitigation measures to reduce the number of people affected by noise. Federal Aviation Administration-approved measures can be eligible for federal funding.

#### **4.11.2.2 State Regulations**

##### **a. California Noise Control Act of 1973**

California Health and Safety Code Sections 46000 through 46080, also known as the California Noise Control Act of 1973, state that excessive noise is a serious hazard to the public health and welfare, and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. The California Noise Control Act also finds that there is a continuous and increasing bombardment of noise in the urban, suburban, and rural areas. The California Noise Control Act declares that the State of California has a responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise. It is the policy of the State to provide an environment for all Californians free from noise that jeopardizes their health or welfare.

##### **b. California Noise Insulation Standards (California Code of Regulations Title 24)**

Interior noise levels for habitable rooms are regulated by the California Building Code; Title 24, Part 2, Volume 1, Chapter 12, Section 1206 of the California Code of Regulations (CCR). The code requires that interior noise levels, attributable to exterior sources, shall not exceed 45 CNEL in any habitable room. These sound insulation requirements are applicable to all habitable spaces.

##### **c. California Green Building Standards Code**

The California Green Building Standards Code (CCR Title 24, Part 11) Chapter 5 – Nonresidential Mandatory Measures, Division 5.5 – Environmental Quality, Section 5.507 – Environmental Comfort, Subsection 5.507.4 – Acoustical Control provides standards for interior noise for nonresidential structures. Pursuant to these standards, all non-residential building construction shall employ building assemblies and components that achieve a composite sound transmission class rating of at least 50 or shall otherwise demonstrate that exterior noise shall not result in an interior noise environment where noise levels exceed 50 dB(A)  $L_{eq}$  in occupied areas during any hour of operation (CCR Title 24, Part 11, Section 5.507 2019).



### 4.11.2.3 Local Regulations

#### a. City of San Diego General Plan

The updated **Noise Element** includes policies intended to minimize noise through standards, site planning, and noise mitigation. To meet this goal, the City has adopted noise criteria for land use planning purposes as part of the Land Use and Community Planning Element, as shown in Section 4.10.2.2c of this EIR (Table 4.10-4). These criteria set indoor and outdoor noise level standards. Consistency with the Noise Element is evaluated in Chapter 4.10.4, Issue 2.

- **Policy NE-B.10.** Allow multi-home residential uses located in areas above 70 dB(A) CNEL affected primarily by motor vehicle traffic noise.
  - A. Limit the amount of outdoor areas subject to exposure above the 70 dB(A) CNEL; and
  - B. Provide noise attenuation to ensure an interior noise level that does not exceed 45 dB(A) CNEL.
- **Policy NE-F.5.** Allow industrial uses, except for research and development, in areas that exceed 80 dB(A) CNEL and ensure industrial uses do not generate noise that would generally exceed existing noise levels.

#### b. City of San Diego Community Plans

Each area of the City is part of a Community Planning Area. Each Community Plan contains design guidelines and policies intended to prevent or mitigate potential noise impacts. While many of these policies are consistent throughout the City, each Community Plan may have policies and design features which are specific to the needs of that community. Applicable Community Plan policies within University and Uptown, including new policies to be implemented with the project are detailed below.

##### ***Uptown Community Plan***

In addition to the General Plan's noise policies which are applicable to all areas in the City, the Uptown Community Plan contains the following noise policies specific to the Uptown Community Planning Area, and applicable to the Hillcrest FPA area, including but not limited to:

- CE-1.2: Create a meaningful visually and functionally cohesive outdoor gathering space that considers protection from excess noise, shadow impacts, and maximizes the positive effects of prevailing breezes to reduce heat and provide natural ventilation to individual residences within multi-family development.
- NE-1.1: Implement operational measures where appropriate in areas where eating, drinking, entertainment, and assembly establishments are adjacent to residential.

- NE-1.2: Evaluate and consider potential noise impacts as a condition of permit approval, renewal, and/or a change of use, for eating and drinking establishments that incorporate “open air” or large outdoor eating and drinking venues, based on acoustical studies and/or industry best practices.
- NE-1.3: Locate the commercial portion of new mixed-use developments away from existing single-family residences and ensure that noise levels generated are at or within acceptable levels when residential uses are located nearby.
- NE-1.5: Encourage the disclosure of noise producing uses during evening hours as part of residential lease agreements and sales for residential uses adjacent to commercial areas within the Hillcrest FPA area within the Commercial and Entertainment Activity Area as outlined in Figure 12-1 of the Implementation Element.
- NE-1.8: Incorporate sound attenuation measures such as sound absorbent wall/ceiling materials, sound walls, and dense, drought tolerant landscaping where commercial uses such as restaurants and bars are permitted, especially adjacent to residential areas.
- NE-1.10: Implement the standard noise controls to reduce construction noise levels emanating from new construction to minimize disruption and annoyance.
- NE-1.11: Encourage the use of traffic calming measures as a means to enhance safety and reduce vehicle noise.
- NE-1.16: Consider existing and future exterior noise levels when planning and designing developments with noise sensitive uses to avoid or attenuate excessive noise levels.
- NE-1.18: Ensure that future residential use above the 60 dB(A) CNEL aircraft noise contour includes noise attenuation measures to ensure an interior noise level of 45 dB(A) CNEL and provides an aviation easement to the airport operator for San Diego International Airport.
- NE-1.21: Work with the Park and Recreation Department to supply and train Park Rangers to use volume meters and to be aware of noise issues in the community.
- NE-1.22: Consider the establishment of a “buffer zone” between the location of special events and Sixth Avenue with the exception of the Pride Festival and Parade.
- NE-1.23: Relocate sound stages and amplification equipment away from Sixth Avenue.

The Hillcrest FPA also proposes a Community Plan Implementation Overlay Zone (CPIOZ) – Type A – Commercial and Entertainment Activity Area (see Figure 3-17) which includes Supplemental Development Regulations (SDRs) that address noise levels within the CPIOZ area. These SDRs include SDR-D.1, which limits the hours of operation for eating and drinking establishments with a sidewalk cafe, streetary, outdoor patio, or active sidewalk within the Commercial and Entertainment Activity Area CPIOZ boundary, and would also prohibit a sidewalk cafe, streetary, outdoor patio, or active sidewalk in an alley abutting a residential development; and SDR-D.2, which would require new residential development within the Commercial and Entertainment Activity Area CPIOZ boundary to prominently display a Commercial and Entertainment Activity Area Disclosure Notice in

any on-site rental or sales offices and to provide this notice to prospective buyers or renters of a residential dwelling unit prior to entering into an agreement to purchase or rent the dwelling unit.

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

In addition to the General Plan's noise policies which are applicable to all areas in the City, the University CPU contains the following noise policies, including new proposed policies, specific to the CPU area including but not limited to:

Vision and Land Use Framework Policies (Commercial, Scientific Research, Industrial, and Mixed-Use Development)

- 1.2E: Provide for the privacy and noise attenuation of adjacent homes on any commercial development sited adjacent to residential development.
- 1.4B and 1.6B: Include acoustically rated windows and doors featuring higher Sound Transmission Class ratings to reduce exterior noise structures with noise sensitive land uses. Retrofit existing structures with the same treatments.
- 1.7P: Ensure that future uses, building intensity, residential density, and heights are compatible with the safety zones, noise contours, and airspace protection surfaces identified in the Airport Land Use Compatibility Overlay Zone of the SDMC for Marine Corps Air Station Miramar.

Urban Design Policies (Screening and Buffering, Freeway-Adjacent Development)

- 2.4A: Conceal all mechanical, electrical, and other building equipment from the public right-of-way and from other existing buildings. Minimize noise and visual impacts with screening materials, landscaping, and other buffers. Locate mechanical equipment away from ground floor primary frontage.
- 2.4C: Attenuate noise through the use of berms, planting, setbacks and architectural design rather than with conventional wall barriers for developments next to transit, trolley, highways or other potential noise-generating uses.
- 2.8E: Buffer residential development from noise with setbacks or elevation differences. Use noise-absorbing building materials and install double-paned windows. Incorporate landscaping materials, landscaped berms, and structural forms in wall design. Consider installation of sound walls where appropriate.
- 2.8F: Incorporate noise attenuation measures on all freeway-adjacent development.

Public Facilities, Services, and Safety Policies (Noise)

- 7.5A: Encourage site planning, design and construction, operational measures, and on-site noise level limit practices that minimize noise, especially for and within mixed-use sites. Limit future residential and other noise-sensitive land uses in areas exposed to high levels of noise.

- 7.5B: Include building design techniques that address noise exposure and the insulation of buildings to reduce interior noise levels (e.g., forced-air ventilation systems, double-paned or sound rated windows, sound insulating exterior walls and roofs, etc.).
- 7.5C: Work with Caltrans to landscape freeway-highway rights-of-way buffers and install low noise pavement surfaces, berms and noise barriers to mitigate freeway and highway traffic noise.
- 7.5D: Seek to reduce exposure, when parks are in noisier areas, through site planning, including locating the most noise sensitive uses, such as children’s play areas and picnic tables, in quieter areas of the site.

## c. City of San Diego Municipal Code

### ***Stationary Noise***

Section 59.5.0401 et seq. of the City’s Municipal Code (SDMC), the Noise Abatement and Control Ordinance, specifies the maximum one-hour average sound level limits allowed at the boundary of a property. These sound level limits are the maximum noise levels allowed at any point on or beyond the property boundaries in one hour due to activities occurring on the property. Where two or more zones adjoin, the sound level limit is the arithmetic mean of the respective limits for the two zones. Table 4.11-4 shows the exterior noise limits specified in the City’s Noise Abatement and Control Ordinance.

Receiving Land Use Category	Noise Level [dB(A)]		
	7:00 a.m. to 7:00 p.m.	7:00 p.m. to 10:00 p.m.	10:00 p.m. to 7:00 a.m.
Single-family Residential	50	45	40
Multi-family Residential (up to a maximum density of 1 dwelling unit/2,000 square feet)	55	50	45
All Other Residential	60	55	50
Commercial	65	60	60
Industrial or Agricultural	75	75	75

SOURCE: City of San Diego Municipal Code Section 59.5.0401.

### ***Construction Noise***

Construction noise is regulated by SDMC Section 59.5.0404, which states that:

- A. It shall be unlawful for any person, between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington’s Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise . . .

- B. . . it shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m.

### 4.11.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to noise are based on applicable criteria in the California Environmental Quality Act Guidelines Appendix G and the City's California Environmental Quality Act Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
- 2) Would the project generate excessive groundborne vibration or groundborne noise levels?

### 4.11.4 Impact Analysis

#### Issue 1 Ambient Noise Levels

*Would the project generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

The project's consistency with the General Plan Noise Element is addressed in Section 4.10.4, Issue 2.c. Other applicable standards are addressed below.

#### a. Construction Noise

Although no specific construction or development is proposed at this time, construction noise impacts could occur as future development within the project areas occurs. Due to the developed nature of project areas, it is anticipated that construction activities could take place adjacent to existing structures and that sensitive receptors could be located in proximity to construction activities.

Construction noise typically occurs intermittently and varies depending upon the nature or phase of construction (e.g., demolition; land clearing, grading, and excavation; erection). Construction noise in any one particular area would be short term and would include noise from activities such as, but not limited to, site preparation, truck hauling of material, pouring of concrete, and the use of power tools. Noise would also be generated by the use of construction equipment, including but not limited to, earthmovers, material handlers, and portable generators, and could reach high levels for brief periods. Table 4.11-5 summarizes typical construction equipment noise levels based on data from the FHWA (2006).

Construction equipment would generate maximum noise levels between 70 and 95 dB(A) maximum sound level ( $L_{max}$ ) at 50 feet from the source when in operation. During excavation, grading, and paving operations, equipment moves to different locations and goes through varying load cycles, and there are breaks for the operators and for non--equipment tasks, such as measurement. Hourly average noise levels would be approximately 83 dB(A)  $L_{eq}$  at 50 feet from the center of construction activity when assessing three pieces of common construction equipment working simultaneously. While future project-specific noise levels would vary depending on the nature of the construction including the duration of specific activities, nature of the equipment involved, and location of the particular receiver, a significant impact could occur if sensitive receptors are located closer than approximately 110 feet from construction activities.

The Blueprint SD Initiative, Hillcrest FPA, and University CPU propose policies which address construction noise associated with future development within the project areas. These policies include, but are not limited to, Hillcrest FPA policy NE-1.10, which calls for the implementation of standard noise controls to reduce construction noise levels emanating from new construction to minimize disruption and annoyance, and University CPU policy 7.5A, which encourages site planning, design and construction, operational measures, and on-site noise level limit practices that minimize noise, especially for and within mixed-use sites. Policies within the Blueprint SD Initiative which address construction noise include, but are not limited to, policies NE-G.1 and NE-G.2, which call on the City to implement limits on the hours of operation for non-emergency construction activity in residential areas and areas abutting residential areas, and to implement limits on excessive public noises that a person could reasonably consider disturbing and/or annoying in residential areas and areas abutting residential areas. Future discretionary development within the project areas would be reviewed for consistency with these policies and adherence to these policies would help reduce potential construction noise impacts.

The City also regulates noise associated with construction equipment and activities through its Noise Abatement and Control Ordinance (SDMC Section 59.5.0404). Specifically, SDMC Section 59.5.0404 places limits on the days of the week and hours of operation allowed for construction. The SDMC Section 59.5.0404(a) allows for a permit for afterhours construction activity to be granted by the Noise Abatement and Control Administrator which would include project-specific conditions including working times, types of construction equipment to be used, and permissible noise levels as required.

Due to the highly developed nature of the project areas and the proposed increase in density and intensity within the project areas, sensitive receptors could potentially be located in proximity to construction sites. Therefore, future construction activities could expose sensitive receptors to substantial noise levels that exceed the standards in the SDMC. Because noise levels due to construction in high-density areas could exceed the standards in the SDMC, impacts would be potentially significant.



Table 4.11-5 Typical Construction Equipment Noise Levels		
Equipment	Noise Level at 50 Feet [dB(A) $L_{eq}$ ]	Typical Duty Cycle
Auger Drill Rig	85	20%
Backhoe	80	40%
Blasting	94	1%
Chain Saw	85	20%
Clam Shovel	93	20%
Compactor (ground)	80	20%
Compressor (air)	80	40%
Concrete Mixer Truck	85	40%
Concrete Pump	82	20%
Concrete Saw	90	20%
Crane (mobile or stationary)	85	20%
Dozer	85	40%
Dump Truck	84	40%
Excavator	85	40%
Front End Loader	80	40%
Generator (25 kilovolt amps or less)	70	50%
Generator (more than 25 kilovolt amps)	82	50%
Grader	85	40%
Hydra Break Ram	90	10%
Impact Pile Driver (diesel or drop)	95	20%
In situ Soil Sampling Rig	84	20%
Jackhammer	85	20%
Mounted Impact Hammer (hoe ram)	90	20%
Paver	85	50%
Pneumatic Tools	85	50%
Pumps	77	50%
Rock Drill	85	20%
Roller	74	40%
Scraper	85	40%
Tractor	84	40%
Vacuum Excavator (vac-truck)	85	40%
Vibratory Concrete Mixer	80	20%
Vibratory Pile Driver	95	20%
SOURCE: FHWA 2006		

## b. Non-Transportation Noise Increases

The SDMC regulates noise level limits through the Noise Abatement and Control Ordinance (SDMC Section 59.5.04010 et seq.), which establishes property line noise limit standards (see Table 4.11-4). Implementation of the project would accommodate development of high-density multi-family and mixed-use development within high village propensity areas. Noise associated with these land uses would include pedestrian traffic, parking activity, and the use of outdoor public spaces. Additionally, the project areas would contain residential and commercial interfaces.

### ***Blueprint SD Initiative***

Mixed-use development areas where residential uses are located in proximity to commercial sites could expose sensitive receptors to noise above the City's standards. As previously discussed, noise levels throughout the project areas are likely to be dominated by vehicle traffic on freeways and heavily traveled area roadways. Noise levels from new stationary sources could increase the hourly or daily average sound level with respect to current conditions from heating, ventilation, and air conditioning units or similar noise sources. Policies within the Blueprint SD Initiative addressing non-transportation noise include, but are not limited to:

- Policy NE-G.2 which calls on the City to implement limits on excessive public noises that a person could reasonably consider disturbing and/or annoying in residential areas and areas abutting residential areas.
- NE-E.1 Encourage the design and construction of commercial and mixed-use structures with noise attenuation methods to minimize excessive noise to residential and other noise-sensitive land uses.
- NE-E.2 Encourage mixed-use developments to locate loading areas, parking lots, driveways, trash enclosures, mechanical equipment, and other noisier components away from the residential component of the development.

In addition to the above policies, future development would be required to ensure any stationary sources of noise are adequately attenuated to meet the property line noise level limits of the SDMC Section 59.5.0401 et seq. These regulations apply to both ministerial and discretionary projects, ensuring future stationary source noise complies with City noise ordinance limitations. While it is not anticipated that stationary sources would result in noise exceeding property line limits, at a programmatic level of review it cannot be ensured without site-specific development details, which are not available at this time. Although enforcement mechanisms for the violation of noise regulations in the Noise Abatement and Control Ordinance would provide for the correction of potential noise exceedances, for the reasons listed above, impacts would remain potentially significant.

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

Buildout of the Hillcrest FPA would increase the planned residential density and non-residential development capacity within the Hillcrest FPA area, and the development of mixed-use areas where residential uses are in proximity to commercial sites could expose sensitive receptors to noise levels above the City's standards. Future discretionary projects would be reviewed for consistency with the Uptown Community Plan noise policies detailed in Section 4.11.2.3c. Specifically, policies would support locating the commercial portion of new mixed-use developments away from existing single-family residences and would ensure that noise levels generated are at or within acceptable levels when residential uses are located nearby.

The Hillcrest FPA would amend the Uptown Community Plan Noise chapter to add a new policy (NE-1.5) which encourages the upfront disclosure of noise levels in mixed-use and residential developments near commercial/entertainment areas during property sales or lease agreements. Policy NE-1.22 would also be amended to clarify that the establishment of a "buffer zone" between

the location of special events and Sixth Avenue should be considered with the exception of the Pride festival and parade.

The Hillcrest FPA also proposes a CPIOZ –Type A – Commercial and Entertainment Activity Area (see Figure 3-17) which includes SDRs that address noise levels for development within the Commercial and Entertainment Activity Area. Eating and drinking establishments within the Commercial and Entertainment Activity Area would be required to comply with SDR D.1, which limits the hours of operation for eating and drinking establishments with a sidewalk cafe, streetary, or active sidewalks and would prohibit operations during the following times:

- Before 7:00 a.m. and after 11:00 p.m. Sunday through Thursday; and
- Before 7:00 a.m. and after 12:00 midnight Friday through Saturday and the day prior to a City holiday.

Additionally, sidewalk cafes, streetaries or active sidewalks are not permitted in an alley abutting a residential development. New residential development would also be subject to SDR–D.2, which would require new residential development within the Commercial and Entertainment Activity Area to prominently display a Commercial and Entertainment Activity Area Disclosure Notice in any onsite rental or sales offices and provide this notice to prospective buyers or renters of a residential dwelling unit prior to entering into an agreement to purchase or rent the dwelling unit. The notices ~~advises~~ warns prospective renters or purchasers of the presence of annoyances or inconveniences from the nearby commercial uses, including noise associated with outdoor dining, music, and drinking activity.

Implementation of the Hillcrest FPA is not anticipated to result in impacts related to non–transportation noise as the project anticipates residential and mixed-use land uses that would be subject to property line noise level limits of the SDMC Section 59.5.0401 et seq. These regulations would ensure any stationary sources of noise such as heating, ventilation, and air conditioning equipment are adequately attenuated to meet property line noise level limits. These regulations apply to both ministerial and discretionary projects, ensuring future stationary source noise complies with City noise ordinance limitations. While it is not anticipated that stationary sources would result in noise exceeding property line limits, at a programmatic level of review it cannot be ensured without site-specific development details, which are not available at this time. Although enforcement mechanisms for the violation of noise regulations in the Noise Abatement and Control Ordinance would provide for the correction of potential noise exceedances, impacts would remain potentially significant.

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

The University CPU proposes policies which address stationary noise associated with future development within the project areas. These policies include, but are not limited to, University CPU policy 7.5A, which encourages site planning, design and construction, operational measures, and on-site noise level limit practices that minimize noise, especially for and within mixed-use sites. Future discretionary development within the University CPU area would be reviewed for consistency with University CPU policies in addition to the SDMC property line noise level limits to ensure stationary noise sources comply with applicable standards at the property line.

While it is not anticipated that stationary sources associated with the project would result in noise exceeding property line limits, at a programmatic level of review it cannot be ensured without site-specific development details, which are not available at this time. However, the City's Noise Ordinance property line standards would apply to future discretionary and ministerial development under the project. Although enforcement mechanisms for the violation of noise regulations in the Noise Abatement and Control Ordinance would provide for the correction of potential noise exceedances, for the reasons listed above, at a programmatic level of review, impacts would remain potentially significant.

### **c. Traffic-Related Noise**

Traffic noise generally dominates the noise environment around the project areas, therefore permanent increases in ambient noise levels would primarily be associated with traffic noise. The project would allow for additional development consistent with the Village Climate Goal Propensity Map and primarily within Climate Smart Village Areas, the University CPU area, and Hillcrest FPA area. Implementation of future development would add to long-term traffic noise and have the potential to affect sensitive land uses. Traffic noise impacts to interior spaces is addressed through required compliance with Title 24 interior noise requirements.

Future traffic noise also has the potential to adversely affect outdoor use areas. Any shift or increase in density could increase traffic volumes along local roadways resulting in increases in ambient noise levels. The General Plan Noise Element Land Use – Noise Compatibility Guidelines identify acceptable exterior noise exposure for various land use types (see Table 4.10-3). Where existing noise levels for the particular land use type are at or in excess of the conditionally compatible noise compatibility guidelines detailed in Table 4.10-3, and a project would contribute vehicle trips to surrounding roadways such that traffic noise levels would result in an increase of more than 3 dB, impacts related to traffic noise would be significant.

Recent CPU EIR analyses have shown that various roadways within the project areas currently generate roadway noise above the levels described above for specified land uses. For example, the Mission Valley CPU Final Program-EIR (City of San Diego 2019) found that under the CPU's density allowances, three roadway segments within the CPU area would experience an increase in the ambient noise levels above 3 dB CNEL. Likewise, the Final Program-EIR for the Uptown CPU (City of San Diego 2016) found three roadway segments within the CPU area which would also experience an increase in the ambient noise levels above 3dB CNEL. As both Mission Valley and Uptown communities are almost entirely located within Climate Smart Village Areas and are characterized by dense urban development, they provide a representative example of ambient noise conditions that could occur with build-out of CPU densities. Similar to the analysis in these recent CPUs that found significant ambient noise increases with build-out of CPU densities, future development under the proposed project could increase traffic volumes and associated traffic-generated noise levels in the project areas. The increased traffic generated noise could result in an increase in ambient noise levels resulting in a significant impact. Thus, impacts would be potentially significant.

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## Issue 2 Groundborne Vibration

*Would the project generate excessive groundborne vibration or groundborne noise levels?*

### a. Construction

Construction activities may include the demolition of existing structures, site preparation work, excavation of parking and subfloors, foundation work, and building construction. Demolition for an individual site may last several weeks to months and may produce substantial vibration. Excavation for underground levels could also occur on some development sites, and vibratory pile driving could be used to stabilize the walls of excavated areas. Piles or drilled caissons may also be used to support building foundations.

As with any type of construction, vibration levels during any phase may at times be perceptible. However, non-pile driving or foundation work construction phases that have the highest potential of producing vibration (such as jackhammering and other high power tools) would be intermittent and would only occur for short periods of time for any individual development site. By use of administrative controls, such as scheduling construction activities with the highest potential to produce perceptible vibration to hours with the least potential to affect nearby properties, perceptible vibration can be kept to a minimum.

Pile driving has the potential to generate the highest groundborne vibration levels and is the primary concern for structural damage when it occurs within close proximity of structures. As shown in Table 4.11-2, vibration generated by construction equipment has the potential to be substantial, since it has the potential to exceed the FTA criteria for architectural damage (e.g., 0.12 PPV for fragile or historical resources, 0.2 PPV for non-engineered timber and masonry buildings, and 0.3 PPV for engineered concrete and masonry). Construction details and equipment for future project-level development is not known at this time; therefore, at a program level of review, impacts related to vibration during construction would be significant.

### b. Railroad

As discussed in Section 4.11.1.3.h, potential sources of groundborne vibration come from current and future trolley, Amtrak, coaster, and freight trains which run on tracks throughout some of the project areas. Implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would involve new transit connections that may present new sources of rail related vibration. Construction of vibration-sensitive uses in close proximity to railroad tracks can cause rattling windows and vibration of floors. Train vibration depends upon a variety of factors. The weight of the train, the travel speed, the condition of the track, and the character of the subsoil all affect the observed vibration level. While future development may be exposed to existing or future vibration associated with rail operations, these would not be considered an impact of the project; therefore, impacts associated with rail operations resulting from project implementation of residential and mixed-use development would be less than significant.

Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and University CPU would also involve future implementation of rail or trolley improvements that would have the potential to

create vibration impacts. While major rail improvements would be outside the scope of this EIR and would require a separate environmental review; the potential impacts of these uses can be disclosed at a program level. An analysis of potential noise and groundborne vibration from the Green Line Trolley as well as the future Blue and Purple Line Trolleys and the Los Angeles–San Diego–San Luis Obispo rail line was completed in the Mission Valley CPU Program–EIR (City of San Diego 2019). The analysis evaluated vibration levels using FTA methodology. Vibration levels are a function of trolley speed and distance to the nearest structure, among other factors. Table 4.11-6 summarizes trolley vibration screening distances from the Mission Valley CPU Program–EIR analysis. The analysis found that significant vibration impacts could occur in areas where noise- and vibration-sensitive uses are located the closest to the tracks (as close as 25 feet). However, based on the location of sensitive land uses and trolley speeds near stations, vibration impacts associated with the Blue, Green, and Purple Line trolleys in Mission Valley were found to be less than significant.

Trolley Speed (mph)	Vibration Level at 25 Feet (VdB)	Distance to (feet)		
		75 VdB (Category 3)	72 VdB (Category 2)	65 VdB (Category 1)
15	67	1	9	33
20	70	6	14	48
25	72	11	21	63
30	73	16	28	77
35	74	21	35	90
40	76	26	42	102
45	77	31	49	114
50	78	36	55	125
55	78	41	62	136
60	79	45	68	147

SOURCE: City of San Diego Mission Valley CPU PEIR, Noise Analysis (City of San Diego 2019a)

Vibration conditions evaluated within the Mission Valley CPU Program–EIR provide a representative analysis of potential rail vibration impacts that could occur throughout the project area. Based on the representative analysis, vibration impacts related to future rail improvements are anticipated to be less than significant; although further, additional environmental review would be required for implementation of new rail improvements as these are outside the scope of the approvals for this project. Implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would result in less than significant impacts related to rail related vibration.

### **c. Stationary Sources**

Industrial manufacturing operations occasionally utilize equipment or processes that have a potential to generate groundborne vibration. However, vibrations found to be excessive for human exposure that are the result of industrial machinery are generally addressed from an occupational health and safety perspective. The residual vibrations are typically of such low amplitude that they quickly dissipate into the surrounding soil and are rarely perceivable at the surrounding land uses.



Residential and commercial uses do not typically generate vibration. Therefore, implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would not be associated with vibration impacts from stationary sources and would result in less than significant impacts.

## Cumulative Impacts

The project would result in an increase in densities within Climate Smart Village Areas, the University CPU area, and the Hillcrest -FPA area. The potential increase in density could result in cumulative impacts associated with increases in ambient noise and vibration associated with higher densities and associated traffic, increases in construction noise, and potential groundborne noise and vibration impacts due to development adjacent to trolley or rail lines.

While the potential increase in density could increase vehicle trips and associated ambient noise levels, the proposed project is intended to support a mode shift from single occupancy vehicles to active transportation modes, which could result in reduced noise levels compared to what was disclosed in recent CPU EIRs. However, the increase in development capacity could generate traffic noise in excess of what was anticipated for citywide, resulting in a potential cumulative increase in noise resulting from higher density development within the project areas, which would be a significant impact. Cumulative impacts associated with Ambient Noise Levels (Issue 1) and Groundborne Vibration (Issue 2) would be significant.

## 4.11.5 Significance of Impacts

### 4.11.5.1 Ambient Noise Levels

#### a. Construction Noise

Construction activities related to implementation of the project would potentially generate short-term noise levels in excess of 75 dB(A)  $L_{eq}$  at adjacent properties. While the City regulates noise associated with construction equipment and activities through enforcement of its Noise Abatement and Control Ordinance, it is possible that some construction activities could exceed 75 dB(A)  $L_{eq}$  in the vicinity of sensitive receptors. Without site-specific development details, such as the extent of construction activities, the construction equipment being utilized, and the distance to sensitive receptors, it cannot be ensured, at the program level, that all construction noise would be reduced to a level below significance. Therefore, impacts associated with construction noise would remain potentially significant.

#### b. Non-Transportation Noise Increases

The project areas would contain residential and commercial interfaces. Other land use interfaces may be present throughout the project areas including residential near industrial uses. Mixed-use areas where residential uses are located in proximity to commercial sites could expose sensitive receptors to noise above allowable levels. While it is not anticipated that stationary sources associated with multi-family residential land uses located within the project areas would result in noise exceeding property line limits, at a programmatic level of review, and without site-specific

development details, it cannot be ensured that all development would be able to meet property line noise limitations. The City's Noise Ordinance property line standards would apply to all future development consistent with the Blueprint SD Initiative, University CPU, and Hillcrest FPA. Although enforcement mechanisms for the violation of noise regulations in the Noise Abatement and Control Ordinance would provide for the correction of potential noise exceedances, impacts would remain potentially significant.

### c. Traffic-Related Noise

Future development within the project areas could result in increases in transportation noise and could have the potential to increase the exposure of sensitive land uses to traffic noise. Implementation of the project would introduce a greater intensity of mixed-use and multi-family development that would generate traffic that would add to existing traffic noise levels. Because implementation of the project would result in a substantial increase in ambient noise due to traffic, increases in ambient noise levels due to project related traffic would be significant.

#### 4.11.5.2 Groundborne Vibration

Potential groundborne vibration impacts related to railroad and stationary sources would be less than significant; however, implementation of the Blueprint SD Initiative, Hillcrest FPA, and University CPU would have the potential to result in groundborne vibration impacts related to construction if pile driving is proposed within close proximity of structures. As shown in Table 4.11-2, vibration generated by construction equipment has the potential to be substantial, since it has the potential to exceed the FTA criteria for architectural damage (e.g., 0.12 PPV for fragile or historical resources, 0.2 PPV for non-engineered timber and masonry buildings, and 0.3 PPV for engineered concrete and masonry). Although specific construction techniques are not known at this program level of review, there is a potential for pile driving to be proposed within the FTA screening distances, resulting in a significant impact.

#### 4.11.6 Mitigation, Monitoring and Reporting

Mitigation measures are provided at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific projects are proposed. Where the mitigation measures refer to City regulations, these are included as the City's regulations provide a standardized process for addressing development impacts across the City and include a process for which impacts can be addressed at a more project-specific level. All development projects are subject to the City's LDC regulations, many of which are put in place for the specific purpose of mitigating or reducing environmental impacts through detailed performance standards that serve as mitigation when implemented at the project level. Therefore, these regulations are referenced as required mitigation. The following mitigation framework provides a program-level framework for reducing significant impacts related to noise.

##### **MM-NOI-1 Noise Abatement and Control Ordinance**

Future projects shall be required to comply with the construction noise levels limits defined by San Diego Municipal Code (SDMC) Section 59.5.0404. If construction noise ~~would~~ exceeds the

construction noise limits, a permit ~~would be required from~~ shall be granted by the Noise Abatement and Control Administrator in accordance with SDMC Section 59.5.0404, which may include the incorporation of. ~~If necessary to comply with SDMC Section 59.5.0404,~~ site specific noise reduction measures ~~may be incorporated~~ to meet property line limitations.

Future development with stationary sources of noise shall comply with Section 59.5.0401 et seq. of the SDMC, which specifies the maximum one-hour average sound level limits allowed at the boundary of a property.

#### **MM-NOI-2    Vibration – Construction Activities**

Future projects- that include pile driving and would result in vibration levels exceeding the PPV and screening distances detailed in Table 4.11-2 shall implement vibration reduction measures to minimize construction-related vibration impacts. Measures shall be based on the results of site-specific recommendations from an acoustical analysis. Measures may include, but are not limited to, limiting the use of vibration-intensive equipment in proximity to sensitive receptors, installing low soil displacement piles (e.g., H-piles) instead of high soil displacement piles (e.g., concrete piles) for pile-driving, and pre-drilling for pile-driving. Other measures may include pre- and post-construction inspections to document any damage and provide repairs in the event damage occurs.

### **4.11.7 Significance after Mitigation**

#### **4.11.7.1    Ambient Noise Levels**

##### **a. Construction Noise**

Implementation of MM-NOI-1 would reduce construction-related noise impacts; however, even with implementation of MM-NOI-1, significant construction noise impacts may still occur because it may not be possible to reduce property line construction noise level limits consistent with the SDMC at all times and a permit from the Noise Abatement and Control Administrator may be required which allows a project to temporarily exceed standards. Construction-related noise impacts would therefore be significant after mitigation.

##### **b. Non-Transportation Noise Increases**

Implementation of MM-NOI-1 is anticipated to be sufficient to reduce noise levels at the property line from stationary sources to less than significant in most cases. While it is not anticipated that stationary sources located within the project areas would result in noise exceeding property line limits, at a programmatic level of review, it cannot be ensured that all future development can demonstrate compliance. Therefore, impacts would remain significant after mitigation.

##### **c. Traffic-Related Noise**

Traffic noise levels under the Blueprint SD Initiative, Hillcrest FPA, and University CPU are expected to contribute to additional traffic noise levels in excess of compatible noise levels for specified land uses defined in the City's land use – noise compatibility guidelines. While at a program level of

review impacts are considered significant, the project is intended to support a shift from vehicle traffic toward transit, pedestrian, and bicycle. City implementation of the policy framework of the Climate Action plan, the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would support non-vehicular modes, which would support reductions in traffic noise over time. At a program level of review, no additional mitigation is available to support further impact reductions.

#### **4.11.7.2 Groundborne Vibration**

Implementation of MM-NOI-2 would reduce potential construction vibration-related impacts; however, even with implementation of MM-NOI-2, significant construction vibration-related impacts may still occur because the project specific construction techniques, locations of construction activities, and location of vibration sensitive land uses are not known at this time. At a program level of review, construction related vibration impacts would therefore remain significant after mitigation.

## 4.12 Public Services

This section analyzes the potential for significant impacts related to public services that could result from the implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update ~~(CPU)~~ (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

Issues addressed in this section include fire-rescue services, police services, schools, and libraries. This section is based on secondary source information including student generation letters received from the San Diego Unified School District (SDUSD). Appendix I-1, Student Generation Estimates and School Facility Impacts for the Hillcrest Focused Plan Amendment, and Appendix I-2, Student Generation Estimates and School Facility Impacts for the University Community Plan Amendment, were received from SDUSD on December 8, 2023 and September 14, 2023, respectively.

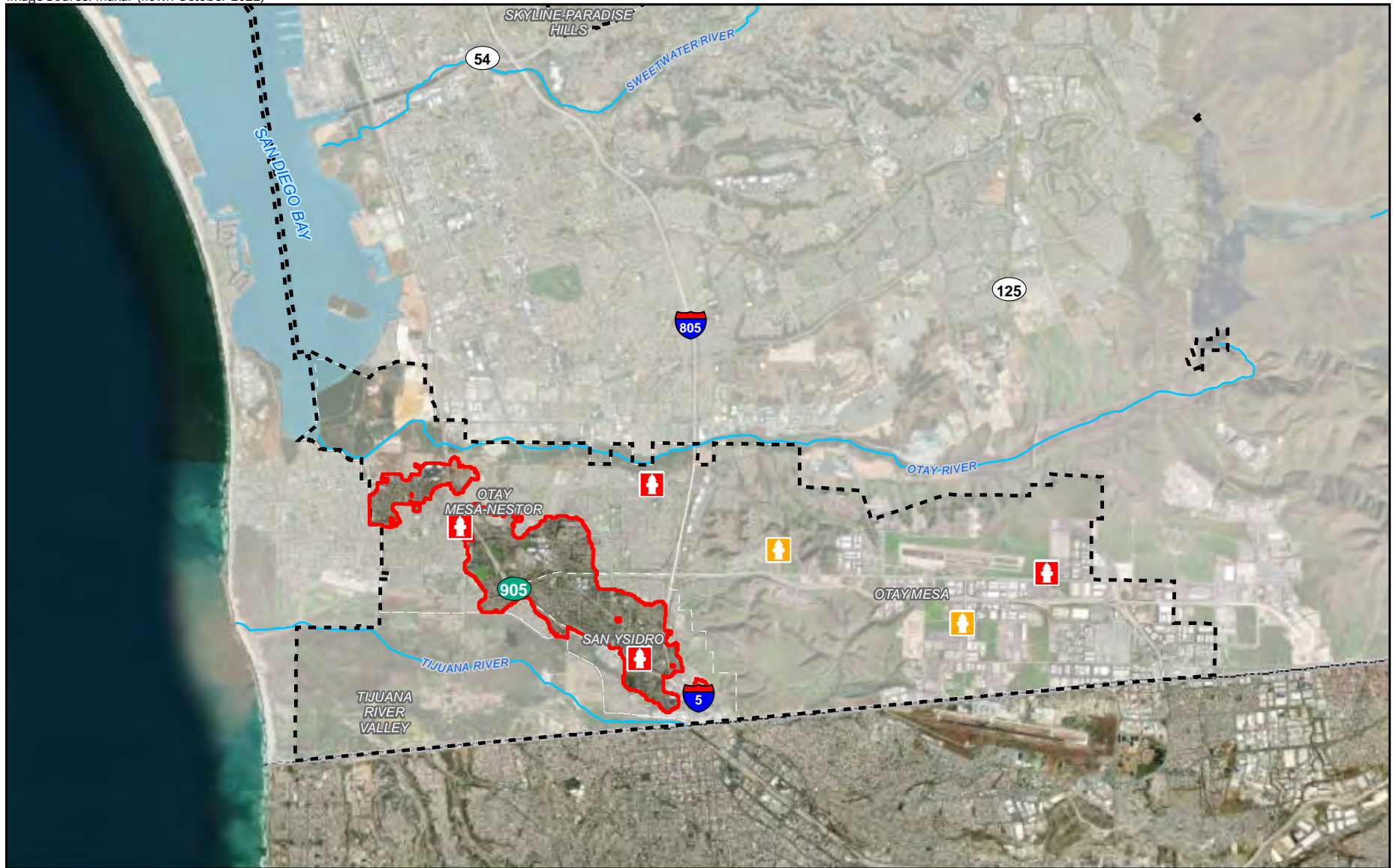
### 4.12.1 Existing Conditions



#### 4.12.1.1 Fire-Rescue Services

##### a. Blueprint SD Initiative

The City’s Fire-Rescue Department (SDFD) provides fire, emergency medical, lifeguard, and emergency management services. This includes 911 services, fire inspections, permits, and community education. SDFD’s service area encompasses approximately 343 square miles of the City, approximately 17 miles of coastline extending three miles offshore, and approximately 4,600 acres around Mission Bay Park. SDFD serves a population of approximately 1,419,845 people. SDFD currently employs 949 uniformed fire personnel, 98 permanent uniformed lifeguard personnel, and 246 civilian personnel.

Currently, there are 52 fire stations strategically located throughout the City to provide emergency service coverage for all communities as well as nine permanent lifeguard stations (31 seasonal stations during peak period). Table 4.12-1 shows the planned fire stations and Table 4.12-2 and Figures 4.12-1a through 4.12-1e show the existing fire stations. The City’s varied topography presents demands on fire-rescue services and can also affect response times.



 Blueprint SD Initiative Climate Smart Village Areas  
 San Diego City Limits

**San Diego Fire Stations**  
 Proposed Fire Station  
 Existing Fire Station



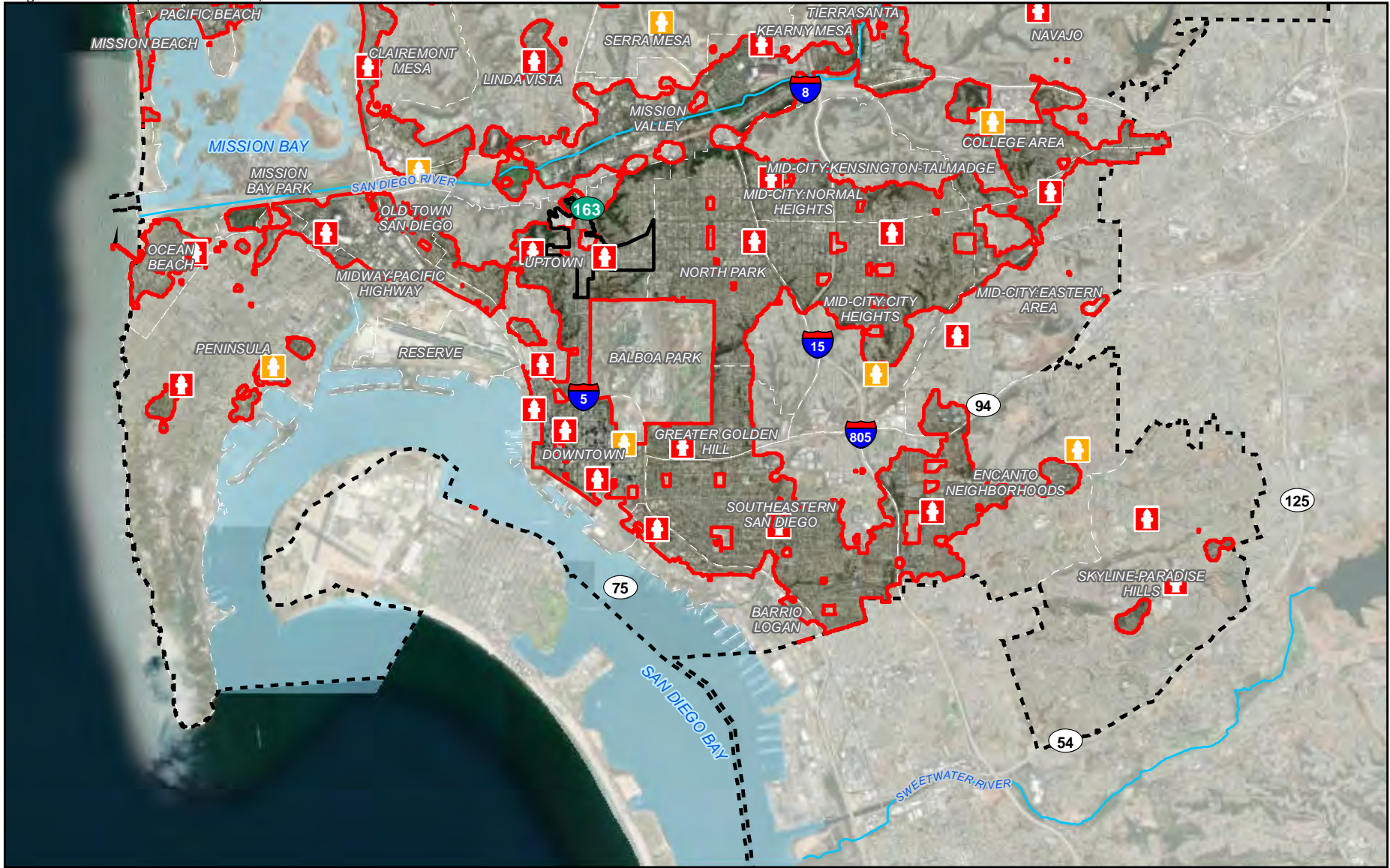





 0 Miles 1.5 

FIGURE 4.12-1a  
Existing Fire Stations in Relation to  
the Project Areas - South





-  Hillcrest Focused Plan Amendment Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

- San Diego Fire Stations**
-  Proposed Fire Station
  -  Existing Fire Station

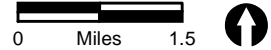
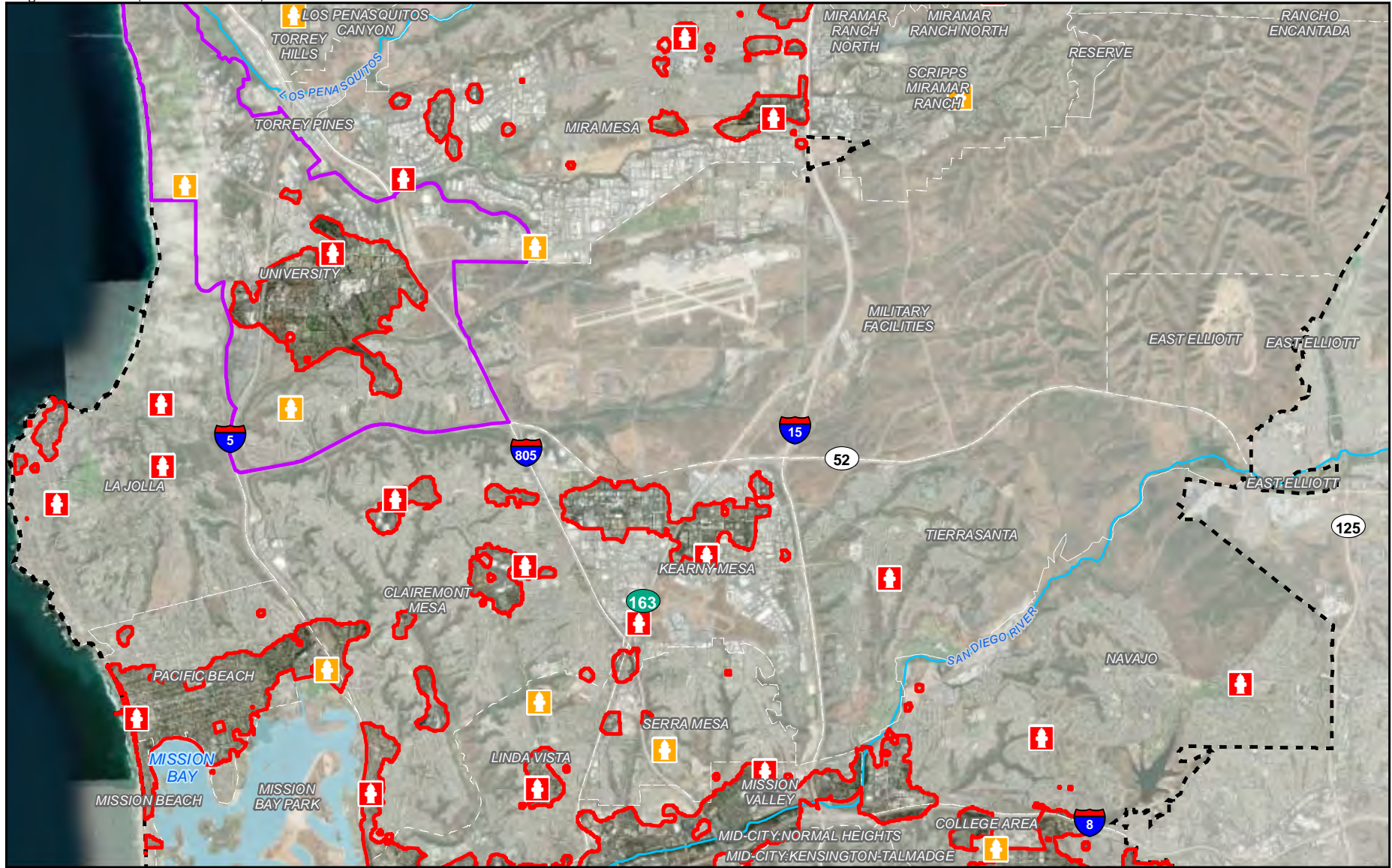


FIGURE 4.12-1b  
Existing Fire Stations in Relation to  
the Project Areas - South Central





- University Community Plan Update Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits

- San Diego Fire Stations**
- Proposed Fire Station
  - Existing Fire Station

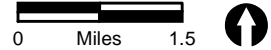
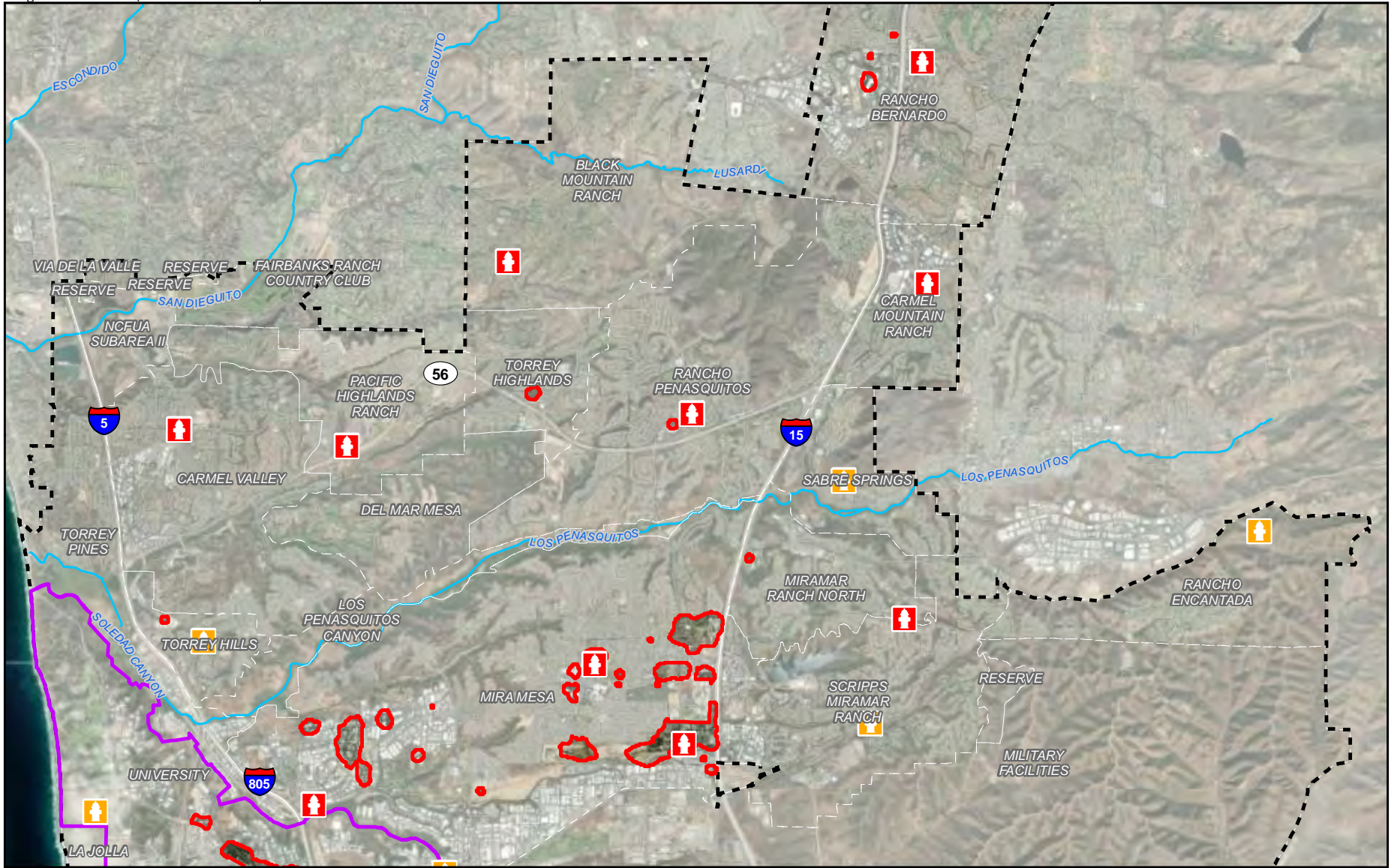


FIGURE 4.12-1c  
Existing Fire Stations in Relation to  
the Project Areas - North Central





- University Community Plan Update Area
- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits

- San Diego Fire Stations**
- Proposed Fire Station
  - Existing Fire Station

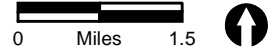
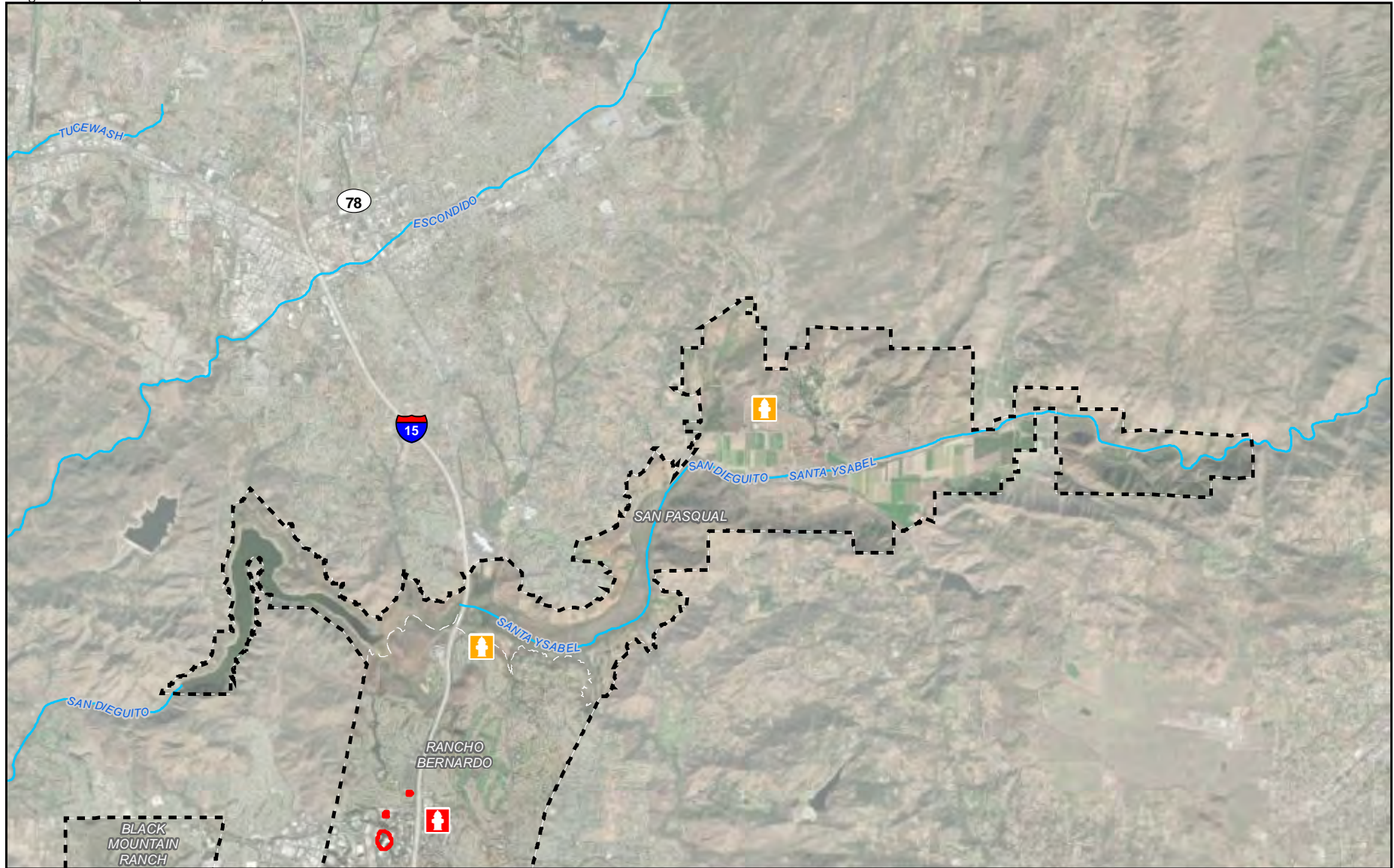






FIGURE 4.12-1d  
Existing Fire Stations in Relation to  
the Project Areas - North





 Blueprint SD Initiative Climate Smart Village Areas  
 San Diego City Limits

**San Diego Fire Stations**  
 Proposed Fire Station  
 Existing Fire Station

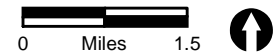


FIGURE 4.12-1e  
Existing Fire Stations in Relation to  
the Project Areas - Northeast

For additional support, the City relies on numerous automatic aid agreements with jurisdictions adjoining the City to ensure that the closest engine company responds to a given incident regardless of which jurisdiction they represent. Mutual aid agreements with county, state, and federal government agencies further allow the City, and any other participating agency, to request additional resources depending on the complexity and needs of a given incident (City of San Diego 2023a).

Table 4.12-1 City of San Diego Planned Fire Stations	
Station Name	Community Planning Area
SD Future East Otay Mesa FS	Otay Mesa
SD Future Otay Mesa FS 49	Otay Mesa
SD Future Encanto FS	Encanto Neighborhoods
SD Future East Village FS	Downtown
<del>SD FS 1/201</del>	<del>Downtown</del>
SD Future FS Home Avenue (N109)Fairmount Avenue Area	Mid-City: City Heights
SD Future Liberty Station FS	Peninsula
<del>SD Lindbergh Field FS</del>	<del>Reserve</del>
<del>SD Future Kensington FS</del>	<del>Mid-City: Kensington-Talmadge</del>
SD Future West Mission Valley FS	Linda Vista
SD Future College Area FS	College Area
<del>SD Future Quarry Falls FS</del>	<del>Mission Valley</del>
SD Future Serra Mesa FS	Serra Mesa
<del>SD Future Navajo FS</del>	<del>Navajo</del>
SD Future Linda Vista FS	Linda Vista
SD Future FS Old Mission Bay Hospital	Pacific Beach
SD Air Operations Base Hangar	Kearny Mesa
<del>SD Proposed Air Operations Base</del>	<del>Kearny Mesa</del>
SD Future FS Stresemann/Governor	University
<del>SD Future FS Nobel/Genesee</del>	<del>University</del>
SD Future University City FS	University
<del>Judicial/Nobel FS 52 Torrey Pines/UCSD</del>	<del>University</del>
SD Future FS La Jolla Site	La Jolla University
SD Future Mira Mesa FS	Mira Mesa
SD Future Scripps Miramar FS	Scripps Miramar Ranch
SD Future Torrey Hills FS	Torrey Hills
SD Future Rancho Encantada FS	Rancho Encantada
SD Future San Pasqual FS	San Pasqual
<del>SD Future Paradise Hills FS 54</del>	<del>Paradise Hills</del>
<del>SD Future Black Mountain Ranch FS 48</del>	<del>Black Mountain Ranch</del>
<del>SD Future Rancho Bernardo East FS</del>	<del>Rancho Bernardo</del>
<del>SD Future Sabre Springs FS</del>	<del>Sabre Springs</del>
SD = San Diego; FS = Fire Station Source: SANGIS	

Table 4.12-2 City of San Diego Existing Fire Stations			
Station Name	District Name	Station Number	Community Planning Area
SD FS 29	San Diego Fire Department	29	San Ysidro
SD FS 43	San Diego Fire Department	43	Otay Mesa
SD FS 30	San Diego Fire Department	30	Otay Mesa-Nestor
SD FS 6	San Diego Fire Department	6	Otay Mesa-Nestor
SD Future Paradise Hills FS 54	San Diego Fire Department	54	Skyline-Paradise Hills
SD FS 32	San Diego Fire Department	32	Skyline-Paradise Hills
Federal FS12	Federal Fire Department	12	Peninsula
SD FS 7	San Diego Fire Department	7	Barrio Logan
SD FS 19	San Diego Fire Department	19	Southeastern San Diego
SD Temporary FS 51	San Diego Fire Department	51	Skyline-Paradise Hills
SD FS 12	San Diego Fire Department	12	Encanto Neighborhoods
SD FS 55	San Diego Fire Department	55	Encanto Neighborhoods
SD FS 4	San Diego Fire Department	4	Downtown
Federal FS2	Federal Fire Department	2	Coronado Island
SD FS 1	San Diego Fire Department	1	Downtown
SD FS 11	San Diego Fire Department	11	Greater Golden Hill
SD FS 2	San Diego Fire Department	2	Downtown
SD FS 22	San Diego Fire Department	22	Peninsula
SD Future North Park FS 55	San Diego Fire Department	55	North Park
SD FS 3	San Diego Fire Department	3	Uptown
SD FS 26	San Diego Fire Department	26	Mid-City: Eastern Area
MCRD San Diego 614	MCRD San Diego	614	Midway-Pacific Highway
SD FS 5	San Diego Fire Department	5	Uptown
SD FS 15	San Diego Fire Department	15	Ocean Beach
SD FS 17	San Diego Fire Department	17	Mid-City: City Heights
SD FS 8	San Diego Fire Department	8	Uptown
SD FS 14	San Diego Fire Department	14	North Park
SD FS 20	San Diego Fire Department	20	Midway-Pacific Highway
SD FS 10	San Diego Fire Department	10	Mid-City: Eastern Area
SD FS 18	San Diego Fire Department	18	Mid-City: Normal Heights
SD Temporary FS 45	San Diego Fire Department	45	Mission Valley
SD FS 25	San Diego Fire Department	25	Clairemont Mesa
SD FS 23	San Diego Fire Department	23	Linda Vista
SD FS 45	San Diego Fire Department	45	Mission Valley
SD FS 31	San Diego Fire Department	31	Navajo
SD FS 21	San Diego Fire Department	21	Pacific Beach
SD FS 34	San Diego Fire Department	34	Navajo
SD FS 28	San Diego Fire Department	28	Kearny Mesa
SD FS 39	San Diego Fire Department	39	Tierrasanta
SD FS 36	San Diego Fire Department	36	Clairemont Mesa
SD Future FS 39	San Diego Fire Department	39	Tierrasanta
SD Future FS 28	San Diego Fire Department	28	Kearny Mesa



Table 4.12-2 City of San Diego Existing Fire Stations			
Station Name	District Name	Station Number	Community Planning Area
<del>SD Future Research Park FS</del>	<del>San Diego Fire Department</del>	<del>39</del>	<del>Tierrasanta</del>
SD FS 13	San Diego Fire Department	13	La Jolla
SD FS 27	San Diego Fire Department	27	Clairemont Mesa
SD FS 16	San Diego Fire Department	16	La Jolla
SD FS 9	San Diego Fire Department	9	La Jolla
<del>SD FS 56</del>	<del>San Diego Fire Department</del>	<del>56</del>	<del>University</del>
<del>MCAS Miramar 62</del>	<del>MCAS Miramar</del>	<del>62</del>	<del>Military Facilities</del>
SD FS 50	San Diego Fire Department	50	University
SD FS 35	San Diego Fire Department	35	University
<del>MCAS Miramar 64</del>	<del>MCAS Miramar</del>	<del>64</del>	<del>Military Facilities</del>
SD FS 41	San Diego Fire Department	41	Mira Mesa
SD FS 44	San Diego Fire Department	44	Mira Mesa
<del>Old SD FS 37</del>	<del>San Diego Fire Department</del>	<del>37</del>	<del>Scripps Miramar Ranch</del>
SD FS 38	San Diego Fire Department	38	Mira Mesa
SD FS 37	San Diego Fire Department	37	Miramar Ranch North
SD FS 47	San Diego Fire Department	47	Pacific Highlands Ranch
SD FS 24	San Diego Fire Department	24	Carmel Valley
SD FS 40	San Diego Fire Department	40	Rancho Peñasquitos
<del>SD Future FS 47 Old Location</del>	<del>San Diego Fire Department</del>	<del>47</del>	<del>Pacific Highlands Ranch</del>
SD FS 42	San Diego Fire Department	42	Carmel Mountain Ranch
SD FS 46	San Diego Fire Department	46	Black Mountain Ranch
<del>SD Future FS 48</del>	<del>San Diego Fire Department</del>	<del>48</del>	<del>Black Mountain Ranch</del>
SD FS 33	San Diego Fire Department	33	Rancho Bernardo
<del>SD Future FS 48 Old Location</del>	<del>San Diego Fire Department</del>	<del>48</del>	<del>Black Mountain Ranch</del>
SD = San Diego; FS = Fire Station; MCRD = Marine Corps Recruit Depot San Diego; MCAS = Marine Corps Air Station			
SOURCE: SANGIS			

The 2017 Fire-Rescue Standards of Response Cover Review identified four remaining gaps to be addressed to improve response times. At the time the report was prepared, the following six remaining community planning areas had gaps in coverage: Southwestern Skyline-Paradise Hills, Northeastern Encanto, Southern University, Pacific Beach, Torrey Hills/South Carmel Valley, Northeastern Rancho Bernardo, and Southern Sabre Springs (City of San Diego 2017).

### **Adopted Fire Station Location Measures**

The City's General Plan Public Facilities, Services, and Safety Element Table PF-D.1 establishes deployment measures to address future growth by population density per square mile (see Table 4.12-3, below).

<b>Table 4.12-3 Deployment Measures to Address Future Growth by Population Density per Square Mile</b>				
	>1,000 People/Sq. Mi.	1,000 to 500 People/Sq. Mi.	500 to 50 People/Sq. Mi.*	Permanent Open Space Areas
1 <sup>st</sup> Due Travel Time	5 minutes	12 minutes	20 minutes	10 minutes
Total Reflex* Time	7.5 minutes	14.5 minutes	22.5 minutes	12.5 minutes
1 <sup>st</sup> Alarm Travel Time	8 minutes	16 minutes	24 minutes	15 minutes
1 <sup>st</sup> Alarm Total Reflex*	10.5 minutes	18.5 minutes	26.5 minutes	17.5 minutes

People/Sq. Mi. = people per square mile  
 \*Reflex time is the total time from receipt of a 911 call to arrival of the required number of emergency units.  
 SOURCE: City of San Diego 2023a

In the most recently available adopted budget for Fiscal Year 2022, the SDFD established key performance indicators and provided the previous year's actual performance data. In Fiscal Year 2021, the SDFD met several performance goals including reducing civilian fire deaths to below the 2021 target and achieving a 95 percent 911 call answered rate of 15 seconds or less after transfer to fire dispatch. Several key performance indicators were not reached, as shown in Table 4.12-4.

<b>Table 4.12-4 San Diego Fire Department Key Performance Indicators</b>		
Performance Indicator	FY2021 Target	FY2021 Actual
Number of civilian fire deaths per 100,000 population <sup>1</sup>	25%	12.5%
Percentage of 911 calls answered in 15 seconds or less after transfer to Fire dispatch	95%	95%
Percent of first responder arrival on emergencies within 6:30 minutes from the assignment of the responder by dispatch to arrival on scene of emergency <sup>2</sup>	90%	76%
Percent of first responder assignment to "E" level medical emergencies and fire/rescue emergencies within 1:30 minutes from the receipt of the 911 call in fire dispatch to the fire company notification <sup>3</sup>	90%	71%
Percentage of effective response force (at least 17 personnel) emergency response arrival within 10:30 minutes <sup>4</sup>	90%	84%

FY = Fiscal Year  
 SOURCE: City of San Diego 2022a  
<sup>1</sup>Fire deaths can vary significantly from year to year.  
<sup>2</sup>This measure has been adjusted from 7:30 to 6:30 beginning in FY2020 to reflect that the measure now focuses on the interval from the time the first responder is assigned to the time the first responder arrives on scene. The previous measure included dispatch processing time (measured separately now) which was not a function of first responder arrival time.  
<sup>3</sup>First responder (fire engines and trucks) response time has been changed to more appropriately measure the response time of the individual unit (and not include dispatch processing time). The dispatch component is now measured in a separate measure. This metric was revised beginning in FY2020 to narrow the focus to "E" level emergencies which are time critical. This metric was revised from 1 minute to 1:30 minutes beginning in FY2021.  
<sup>4</sup>SDFD's inability to meet response time goals is heavily influenced by an insufficient number of geographically distributed resources to reach all communities within the desired response time goals. A comprehensive assessment of the SDFD's Standards of Response Coverage Deployment was conducted in 2011, and updated in 2017, which identified communities where additional resources are needed to achieve compliance.

## **b. Hillcrest Focused Plan Amendment**

The Uptown Community Planning area, including the Hillcrest FPA area, is currently served by three fire stations: Fire Stations 3, 5, and 8. Fire Station 3, located at 725 West Kalmia Street, has a service area of approximately 2.24 square miles and serves Midtown, Balboa Park, and its surrounding areas. Fire Station 5, located at 3902 9<sup>th</sup> Avenue, has a service area of approximately 4.12 square miles and serves Hillcrest and its surrounding areas. Fire Station 8, located at 3974 Goldfinch Street, has a service area of approximately 2.66 square miles and serves Mission Hills and its surrounding areas.

A particular fire threat in the Uptown Community Planning area is the open space canyons from which damaging fires have occurred in the past. SDFD's Wildland Management and Enforcement Section has several active programs (see Section 4.18.2.3b of this Program Environmental Impact Report [PEIR]) which promote the clearing of canyon vegetation away from structures; however, the SDFD does not have resources to conduct weed abatement on behalf of privately owned parcels within the City. SDFD also provides emergency/rescue services, hazard prevention, and safety education to ensure the protection of life, property, and the environment, including education about vegetation management to protect properties from wildfires in canyon areas.

Fire Station 8 was expanded in Fiscal Year 2020 and included new quarters and a redesign of the facility's working areas to provide full functionality. SDFD continuously evaluates upgrades, expansions, and new facilities to maintain adequate service to the community. As growth and development occur, fire station capacity would be evaluated to ensure that station locations and staffing levels are adequate to maintain acceptable levels of service.

## **c. University Community Plan Update**

The University CPU area is currently served by two fire stations: Fire Stations 35 and 50. Fire Station 35, located at 4285 Eastgate Mall, has a service area of approximately 11.32 square miles and serves the northern portion of the University CPU area. Fire Station 50 is located at 7177 Shoreline Drive and primarily serves the southern portion of the University CPU area. A new fire station, Fire Station 52, is currently under construction, is adjacent to the University of California, San Diego (UCSD), and would primarily serve the northern portion of the University CPU area to maintain and improve response times. Limited portions of the University CPU area are further supported and serviced by nearby fire stations, as follows: Fire Station 41, located at 4914 Carroll Canyon Road, has a service area of approximately 10.20 square miles and serves the northern portion of the University CPU area; Fire Station 9, located at 7870 Ardath Lane, has a service area of approximately 4.72 square miles and serves the southeast portions of the University CPU area; and Fire Station 27, located at 5064 Clairemont Drive, has a service area of approximately 5.80 square miles and serves the southern portion of the University CPU area.

## 4.12.1.2 Police Services

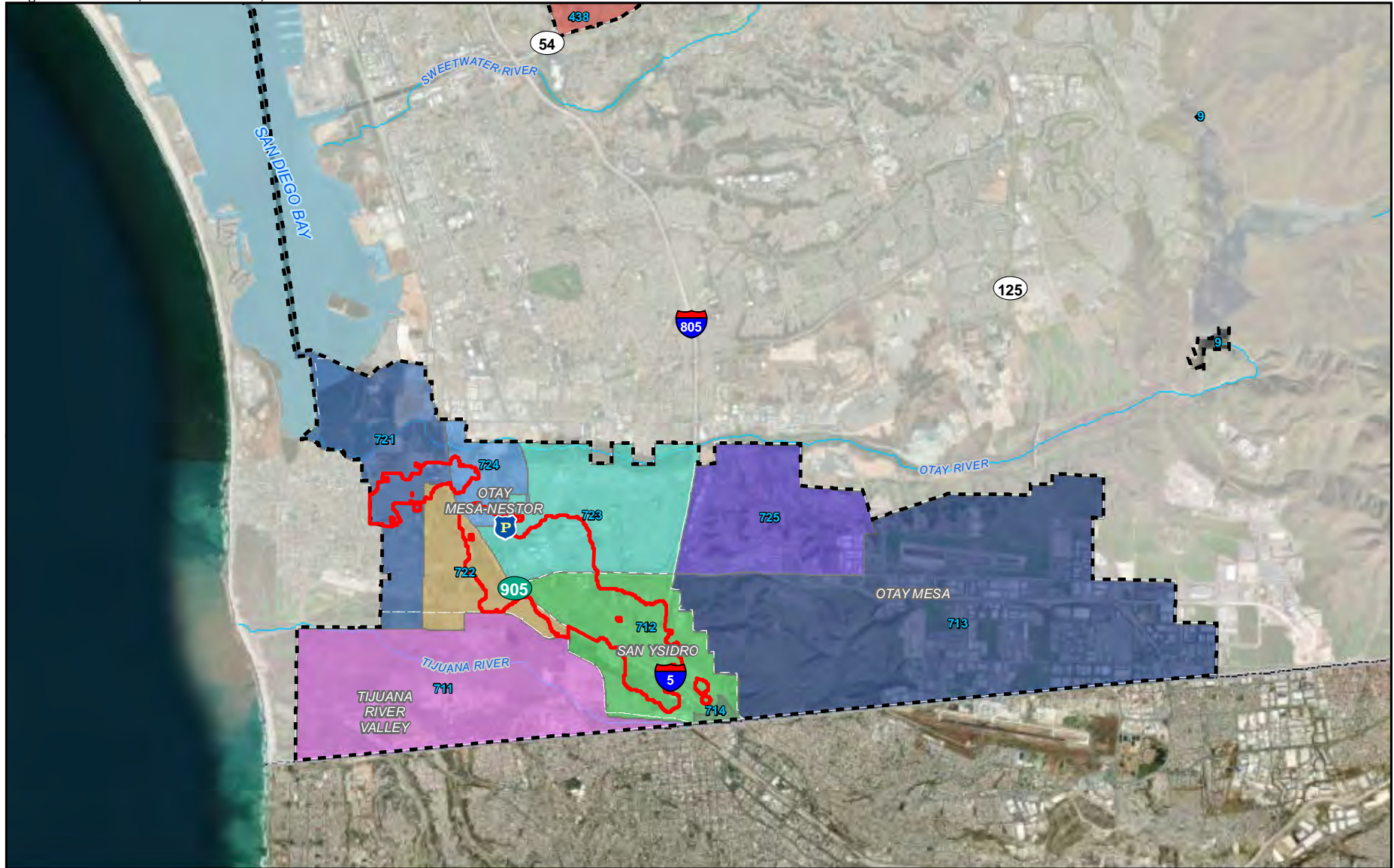
### a. Blueprint SD Initiative





The City is served by the San Diego Police Department (SDPD), which provides patrol, traffic, investigative, records, laboratory, and support services (City of San Diego 2023a). The SDPD service area encompasses approximately 372.4 square miles in the City and the SDPD serves a population of approximately 1.41 million people. SDPD has divided the City's neighborhoods into nine patrol divisions: Central, Eastern, Mid-City, Northeastern, Northern, Northwestern, Southeastern, Southern, and Western. Each area of the City is patrolled by a beat. Table 4.12-5 and Figures 4.12-2a through 4.12-2e show the police stations and beats associated with each community planning area.

Facility	Address	Community Plan
San Diego Police - Central Division	2501 Imperial Avenue	Southeastern San Diego
San Diego Police - Eastern Division	9225 Aero Drive	Kearny Mesa
San Diego Police - Mid-City Division	4310 Landis Street	Mid-City: City Heights
San Diego Police - Northeastern Division	13396 Salmon River Road	Rancho Peñasquitos
San Diego Police - Northern Division	4275 Eastgate Mall	University
San Diego Police - Northwestern Division	12592 El Camino Real	Carmel Valley
San Diego Police - Southeastern Division	7222 Skyline Drive	Skyline-Paradise Hills
San Diego Police - Southern Division	1120 27 <sup>th</sup> Street	Otay Mesa-Nestor
San Diego Police - Traffic Division/ Special Events	9265 Aero Drive	Kearny Mesa
San Diego Police - Western Division	5215 Gaines Street	Linda Vista
San Diego Police Headquarters	1401 Broadway	Downtown
San Diego Police Neighborhood Policing Division	4020 Murphy Canyon Road	Kearny Mesa
SOURCE: SANGIS		

The SDPD has three new facility projects planned within the Fiscal Year 2024-2028 Five-Year Capital Infrastructure Planning Outlook. These include a new Firearms Training Facility, Police Plaza tenant improvements, and a feasibility study for a new Northern Division facility (City of San Diego 2022b).

From January to December of 2023, the SDPD received 734,945 911 calls and 439,081 calls for service. In the most recently available adopted budget for Fiscal Year 2023, the SDPD established key performance indicators and provided the previous year's actual performance data. SDPD establishes call priority categories as follows: priority E (imminent threat to life), priority 1 (serious crimes in progress), priority 2 (less serious crimes with no threat to life), priority 3 (minor crimes/requests that are not urgent), priority 4 (minor requests for police service). In Fiscal Year 2022, the SDPD met one response time performance goal, with an average response time of 6.6 minutes for priority E calls. Several performance goals were not reached, as shown in Table 4.12-6 (City of San Diego 2022c).



-  Police Station
-  Police Beats
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

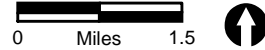
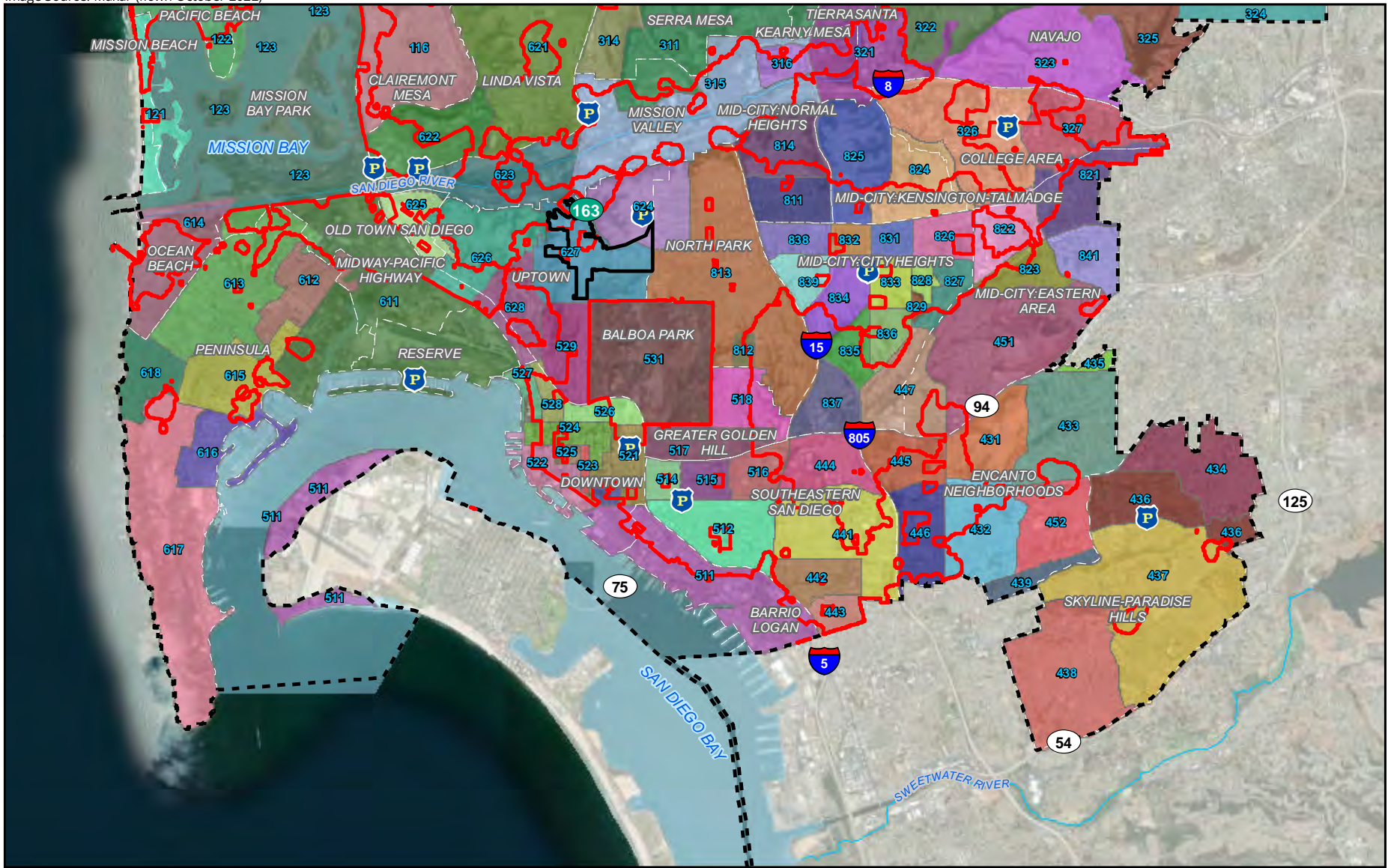







FIGURE 4.12-2a  
Existing Police Stations in Relation to  
the Project Areas - South





-  Police Station
-  Police Beats
-  Hillcrest Focused Plan Amendment Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

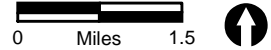
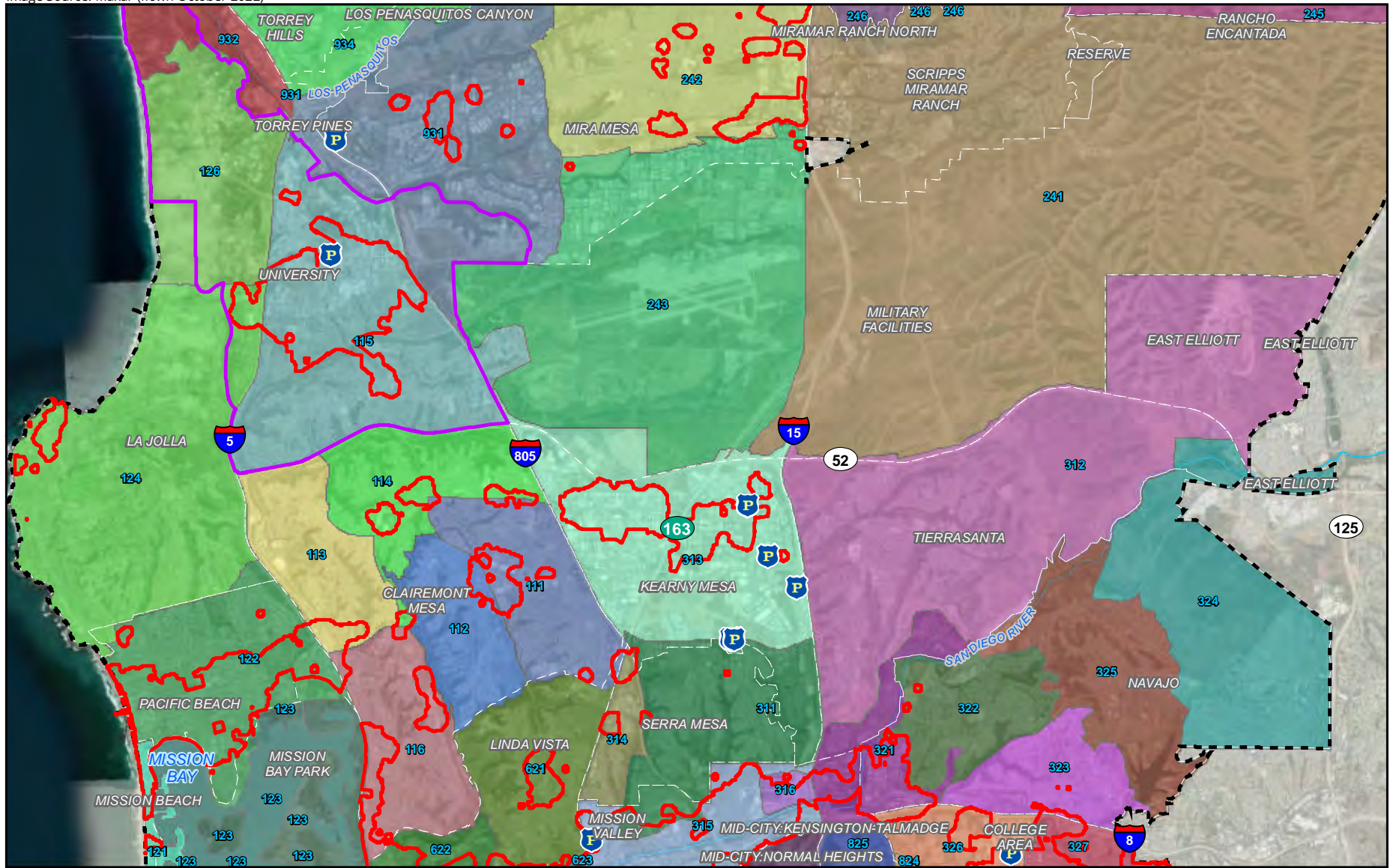







FIGURE 4.12-2b  
Existing Police Stations in Relation to  
the Project Areas - South Central





-  Police Station
-  Police Beats
-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

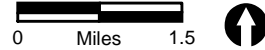
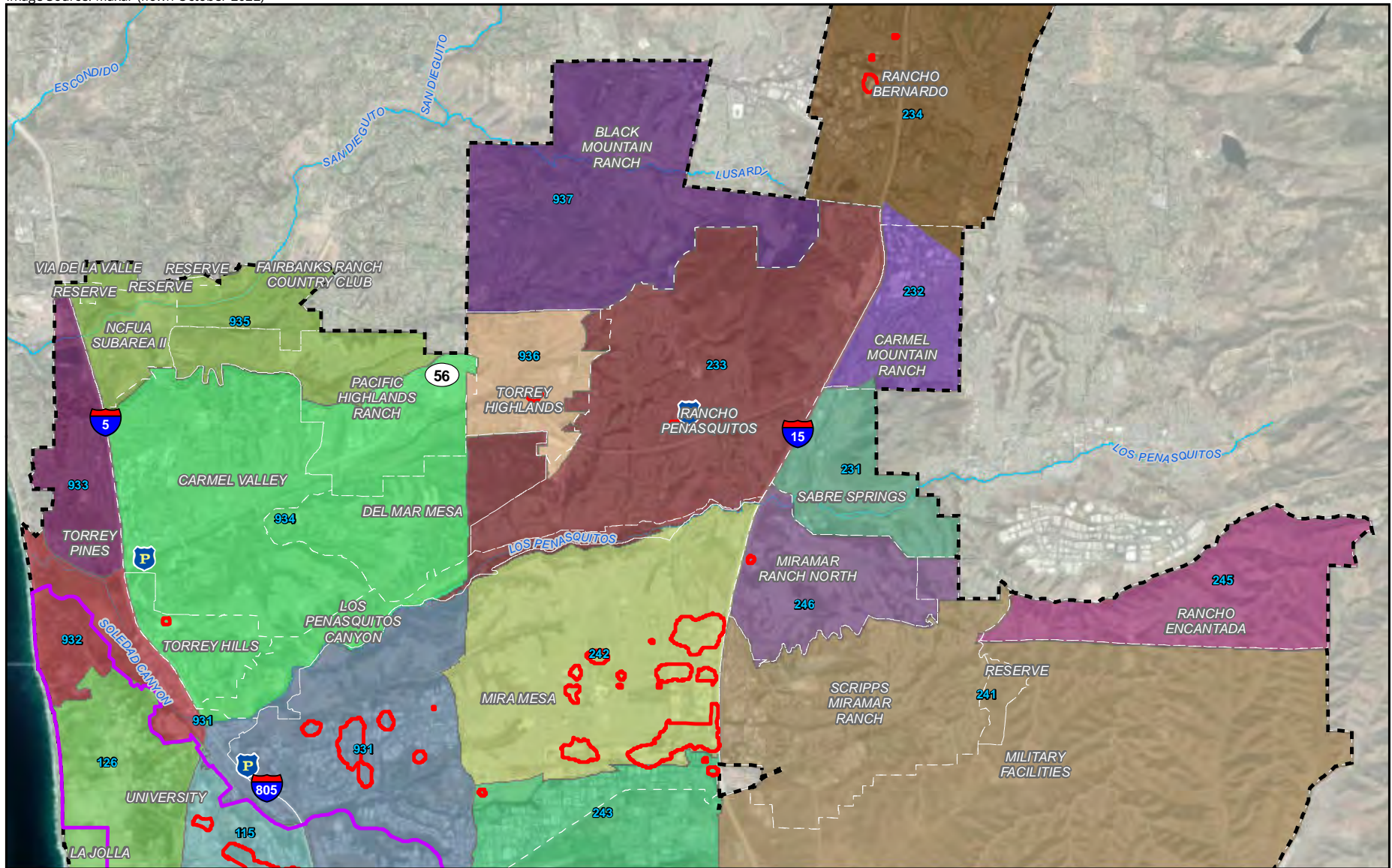







FIGURE 4.12-2c  
Existing Police Stations in Relation to  
the Project Areas - North Central





-  Police Station
-  Police Beats
-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

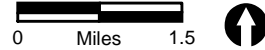
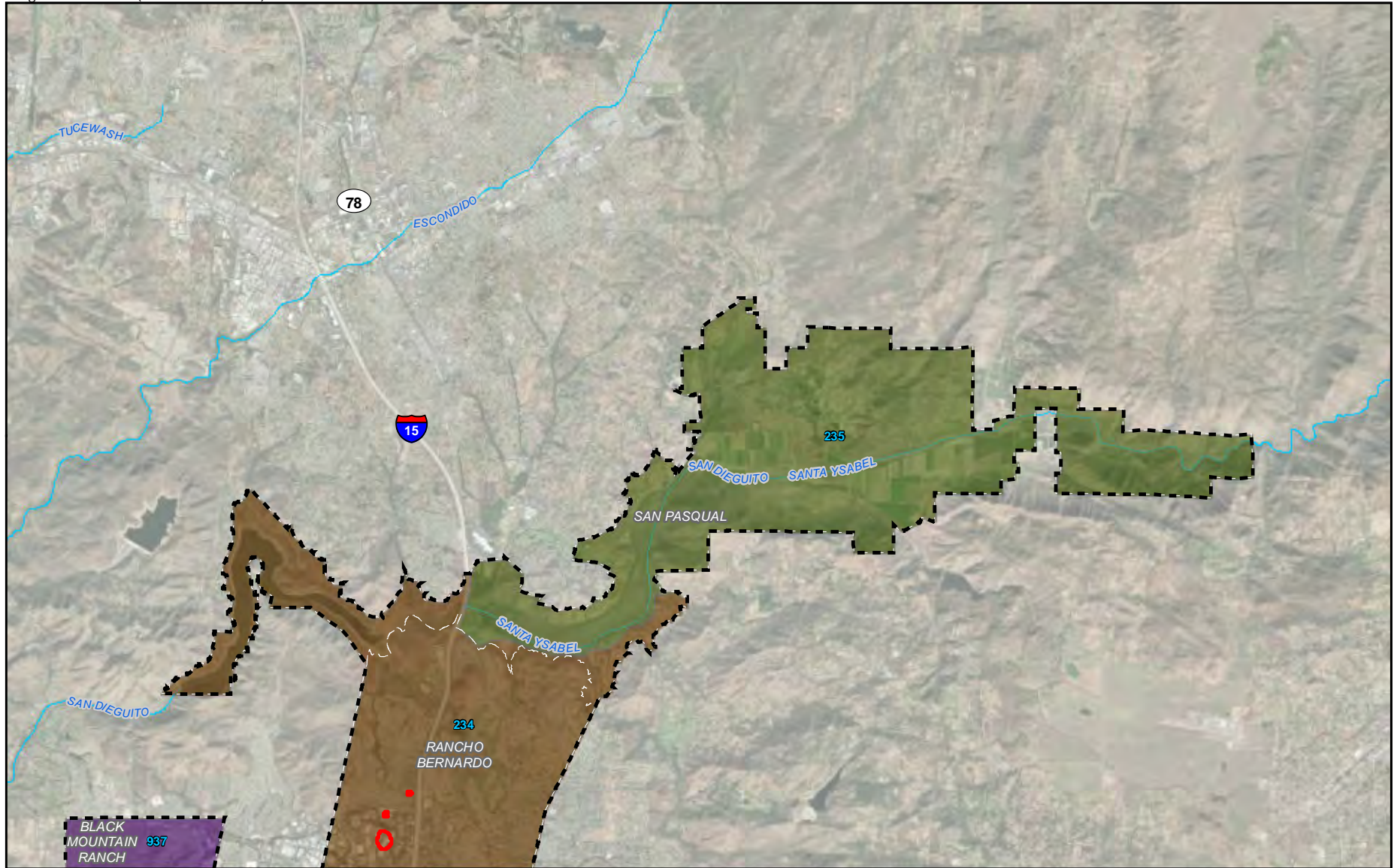





FIGURE 4.12-2d  
Existing Police Stations in Relation to  
the Project Areas - North





-  Police Beats
-  122 Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

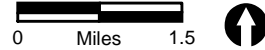


FIGURE 4.12-2e  
Existing Police Stations in Relation to  
the Project Areas - Northeast

Table 4.12-6 City of San Diego San Diego Police Department Key Performance Indicators		
Performance Indicator	FY2022 Target	FY2022 Actual
Percentage of 911 calls answered within 10 seconds <sup>1</sup>	90 percent	80 percent
Average response time to priority E calls (in minutes)	7	6.6
Average response time to priority 1 calls (in minutes)	14	36.8
Average response time to priority 2 calls (in minutes)	27	128.3
Average response time to priority 3 calls (in minutes)	80	209.1
Average response time to priority 4 calls (in minutes)	90	93.8
SOURCE: City of San Diego 2022a		
<sup>1</sup> The California Office of Emergency Services mandates that 95 percent of incoming 911 calls be answered within 15 seconds or less. The National Emergency Number Association mandates that 90 percent of incoming 911 calls be answered within 15 seconds or less; 95 percent of all 911 calls should be answered within 20 seconds.		

## b. Hillcrest Focused Plan Amendment

The Uptown Community Planning area, including the Hillcrest FPA area, is served by the Central and Western Divisions of the SDPD. The Central Division station is at 2501 Imperial Avenue in Southeastern San Diego and the Western Division station is at 5215 Gaines Street in Mission Valley (City of San Diego 2023b). The Uptown Community Planning area is patrolled by Beats 529, 624, 625, 626, 627, and 628. The Hillcrest FPA area is primarily served by Beat 627; however, Beat 624 covers a small portion of the northeastern corner of the Hillcrest FPA area and Beat 626 covers a small portion of the northwestern corner of the Hillcrest FPA area (see Figure 4.12-2b).

## c. University Community Plan Update

The University CPU area is predominantly served by the Northern Division of the SDPD, which is located at 4275 Eastgate Mall. The Northern Division encompasses approximately 41 square miles and serves a population of approximately 225,000 people (City of San Diego 2023c). The Miramar area east of Interstate 805 is served by the Northwestern Division which is located at 12592 El Camino Real. The UCSD Police Department is located at 9500 Gilman Drive and serves UCSD. The University CPU area is patrolled by Beats 115, 126, 932, and 933. Beats 932 and 933 patrol the northern portion of the University CPU area, Beat 126 patrols the central portion of the University CPU area, and Beat 115 patrols the southeastern portion of the University CPU area (see Figures 4.12-2c and 4.12-2d).

### 4.12.1.3 Schools

#### a. Blueprint SD Initiative

##### *K-12 Schools*

The SDUSD is a kindergarten through 12<sup>th</sup> grade (K-12) school district and provides educational services to approximately 80 percent of the City (Table 4.12-7). In addition to SDUSD, there are 16

smaller school districts, including elementary and secondary levels, which service the outlying northern, eastern, and southern areas of the City (City of San Diego 2023b). There are 286 schools serving the project area. The SDUSD applies the following guidelines in the planning of school facilities, pursuant to the California Department of Education regulations:

- Elementary schools: maximum enrollment of 700 students. Site of approximately seven acres required to support the educational program and accommodate physical education and athletics.
- Junior high/middle schools: maximum enrollment of 1,500 students. Site of approximately 15 acres required to support the educational program and accommodate physical education and athletics.
- Comprehensive senior high schools: maximum enrollment of 2,000 students. Site of approximately 25 acres required to support the educational program and accommodate physical education and athletics.

School Year	2018-19	2019-20	2020-21	2021-22	2022-23
Total Enrollment	124,105	122,916	118,523	114,467	112,790
Percent Change	n/a	-0.96%	-3.57%	-3.42%	-1.47%
K-12 = Kindergarten through 12 <sup>th</sup> Grade; n/a = not applicable; % = percent SOURCE: Ed-Data 2023					

## **b. Hillcrest Focused Plan Amendment**

### ***K-12 Schools***

There are six public schools and seven private schools located within the Uptown Community Planning area (Table 4.12-8). Additionally, students in the Uptown Community Planning area can attend Roosevelt International Middle School (located at 3366 Park Boulevard in the Balboa Park Community Planning area) and San Diego High School (located at 1405 Park Boulevard in the Downtown Community Planning area). Overall, these six public schools saw a net decrease of -6.71 percent in enrollment over a five-year period (School Year 2018-2019 through School Year 2022-2023).

<b>Table 4.12-8 Schools Serving the Uptown Community Planning Area</b>	
School Name	School Type
Birney Elementary (SDUSD)	Elementary
Florence Elementary (SDUSD)	Elementary
Grant K-8 (SDUSD)	Elementary
Home Hospital and Transition Supports School (SDUSD) <sup>1</sup>	K-12
Museum (SDUSD)	Elementary
Old Town Academy K-8 Charter (SDUSD)	Elementary
Roosevelt International Middle (SDUSD)	Middle
San Diego High (SDUSD)	High School
Francis Parker (Private)	K-12
St. Vincent de Paul (Private)	Preschool-8
Aseltine (Private)	K-12
Comprehensive Educational Services, DBA: Aces Academy (Private)	1- Transition age (18-22)
Montessori School of San Diego (Private)	Preschool and Elementary
Balboa City School (Private)	1-12
City Tree Christian (Private)	K-8
SDUSD = San Diego Unified School District; K-8 = Kindergarten through 8 <sup>th</sup> Grade; K-12 = Kindergarten through 12 <sup>th</sup> Grade; DBA = doing business as <sup>1</sup> This school does not appear on Figure 7-1 of the Uptown Community Plan as it is a school that provides services at hospitals and transition settings and to students confined to their homes per a physician's order.	

## ***Universities***

### ***University of California, San Diego: Hillcrest Campus***

The Hillcrest campus of UCSD is located in the Uptown Community Planning area and occupies approximately 62 acres. UCSD adopted a Long-Range Development Plan (LRDP) in 2019 for its Hillcrest campus which includes plans to accommodate approximately 1,000 residential units (21 existing and 979 proposed) and plans to increase medical, research, and administrative faculty and staff from 4,450 persons to approximately 5,200 persons.

## **c. University Community Plan Update**

### ***K-12 Schools***

The University CPU area is served by a range of schooling options. There are six public schools at the K-12 levels in the University CPU area: Spreckels Elementary, Marie Curie Elementary, Standley Middle, and University City High Schools are in the southern portion of the University CPU area; and Doyle Elementary and the Preuss School Middle and High Schools are in the northern portion of the University CPU area. In addition, there are several private schools throughout the University CPU area, including Mission Bay Montessori, Fusion Academy, Torah High, and La Jolla Country Day School. Overall, public schools in the University CPU area saw a net decrease of -9.38 percent in enrollment over a five-year period (School Year 2018-2019 through School Year 2022-2023), just



slightly above the district average for the same period. Table 4.12-9 shows the existing schools serving the University CPU area.

School Name	School Type
Marie Curie Elementary (SDUSD)	Elementary School
Doyle Elementary (SDUSD)	Elementary School
Preuss School UCSD	Middle School/High School
Spreckels Elementary (SDUSD)	Elementary School
Standley Middle (SDUSD)	Intermediate/Middle School
University City High (SDUSD)	High School
La Jolla Country Day (Private)	Kindergarten through 12 <sup>th</sup> Grade
Torah High	High School
Fusion Academy	Middle School/High School
Mission Bay Montessori	Elementary
SDUSD = San Diego Unified School District; UCSD = University of California, San Diego	

## **Universities**

### **University of California, San Diego: La Jolla Campus**

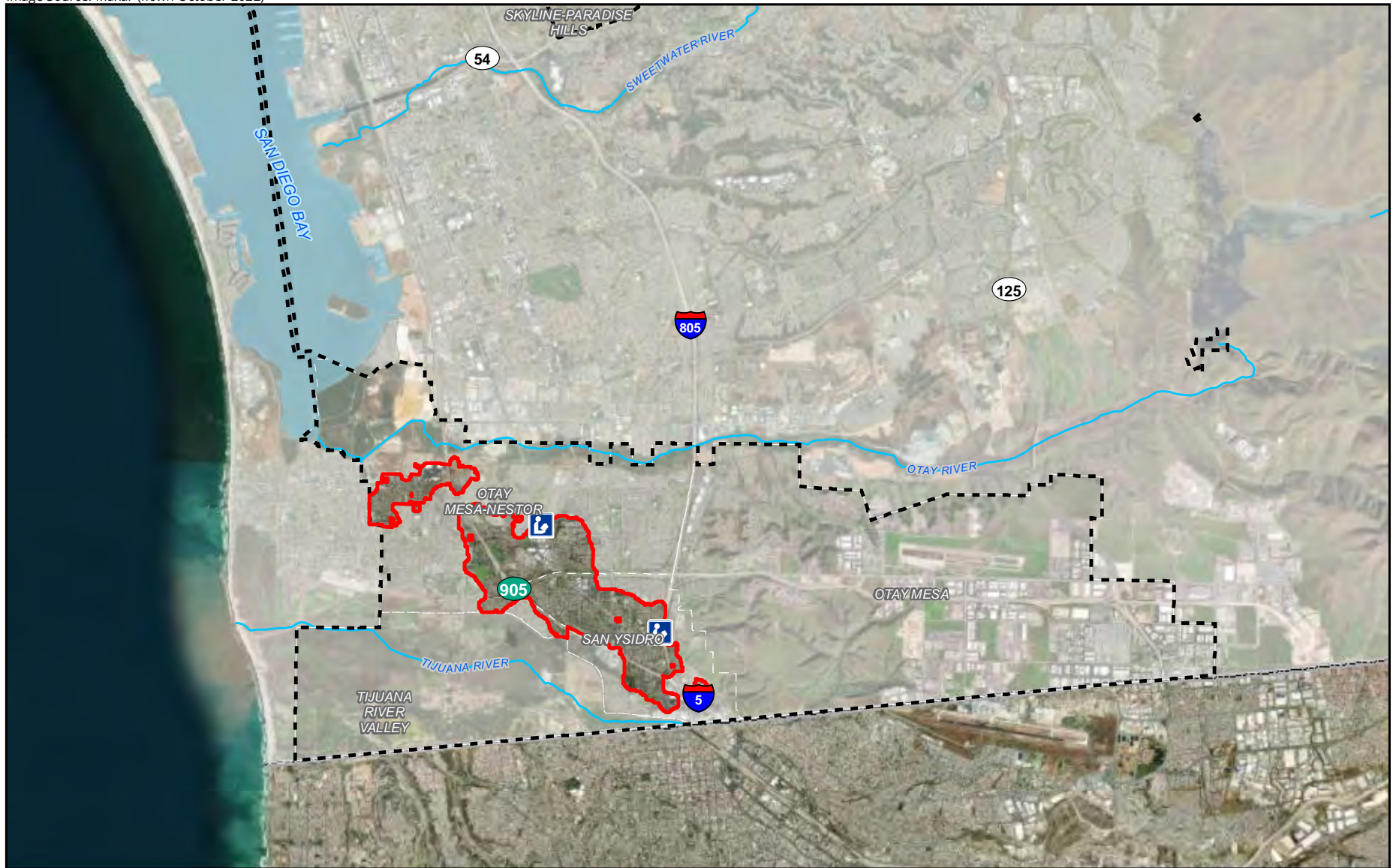
The UCSD San Diego Campus, La Jolla occupies a portion of North University and straddles Interstate 5, generally occupying the area west of North Torrey Pines Road, north of La Jolla Village Drive, west of Regents Road, and south of Genessee Avenue. The physical growth and development of the UCSD San Diego Campus, La Jolla is guided by UCSD's 2018 Campus LRDP. The LRDP seeks to direct land use and capital projects to accommodate future space needs of up to 8.9 million net new gross square floor area of University growth. The LRDP also seeks to respond to projected demands for student enrollment, consistent with the Master Plan for Higher Education in California, to accommodate 42,400 students by the 2035-36 academic year (or until a new LRDP is approved by the University of California Regents).




## **4.12.1.4 Libraries**

### **a. Blueprint SD Initiative**

The City's existing library system comprises the Central Library and 36 branch libraries (Table 4.12-10; Figures 4.12-3a through 4.12-3e). The Library Master Plan divides the City into six zones (Table 4.12-11), which roughly correlate with the following areas: Zone A (Northern San Diego); Zone B (North/Downtown); Zone C (Eastern/Suburban); Zone D (Downtown/South); Zone E (Southeastern); and Zone G (South Bay/Border). The Library Master Plan identifies three zones in need of new libraries: Zones A, B, and G (City of San Diego 2023c).

<b>Table 4.12-10 City of San Diego Libraries</b>		
<b>Branch Name</b>	<b>Address</b>	<b>Community Planning Area</b>
San Ysidro	4235 Beyer Boulevard	San Ysidro
Otay Mesa/Nestor	3003 Coronado Avenue	Otay Mesa-Nestor
Paradise Hills	5922 Rancho Hills Drive	Skyline-Paradise Hills
Skyline Hills	7900 Paradise Valley Road	Skyline-Paradise Hills
Mountain View/Beckwourth	721 San Pasqual Street	Southeastern San Diego
Logan Heights	567 South 28 <sup>th</sup> Street	Southeastern San Diego
San Diego Central	330 Park Boulevard	Downtown
Valencia Park /Malcolm X	5148 Market Street	Encanto Neighborhoods
Oak Park	2802 54th Street	Mid-City: Eastern Area
Point Loma/Hervey	3701 Voltaire Street	Peninsula
Ocean Beach	4801 Santa Monica Avenue	Ocean Beach
City Heights/Weingart	3795 Fairmount Avenue	Mid-City: City Heights
North Park	3795 31 <sup>st</sup> Street	North Park
Mission Hills-Hillcrest/Knox	215 West Washington Street	Uptown
University Heights	4193 Park Boulevard	North Park
Kensington-Normal Heights	4121 Adams Avenue	Mid-City: Kensington-Talmadge
College-Rolando	6600 Montezuma Road	College Area
Mission Valley	2123 Fenton Parkway	Mission Valley
Linda Vista	2160 Ulric Street	Linda Vista
Benjamin	5188 Zion Street	Navajo
Clairemont	2920 Burgener Boulevard	Clairemont Mesa
Pacific Beach/Taylor	4275 Cass Street	Pacific Beach
San Carlos	7265 Jackson Drive	Navajo
Serra Mesa-Kearny Mesa	9005 Aero Drive	Serra Mesa
Tierrasanta	4985 La Cuenta Drive	Tierrasanta
Balboa	4255 Mt. Abernathy Avenue	Clairemont Mesa
North Clairemont	4616 Clairemont Drive	Clairemont Mesa
La Jolla/Riford	7555 Draper Avenue	La Jolla
University Community	4155 Governor Drive	University
North University Community	8820 Judicial Drive	University
Scripps Ranch	10301 Scripps Lake Drive	Scripps Miramar Ranch
Mira Mesa	8405 New Salem Street	Mira Mesa
Carmel Valley	3919 Townsgate Drive	Carmel Valley
Rancho Peñasquitos	13330 Salmon River Road	Rancho Peñasquitos
Carmel Mountain Ranch	12095 World Trade Drive	Carmel Mountain Ranch
Rancho Bernardo	17110 Bernardo Center Drive	Rancho Bernardo



-  Library
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

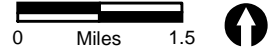
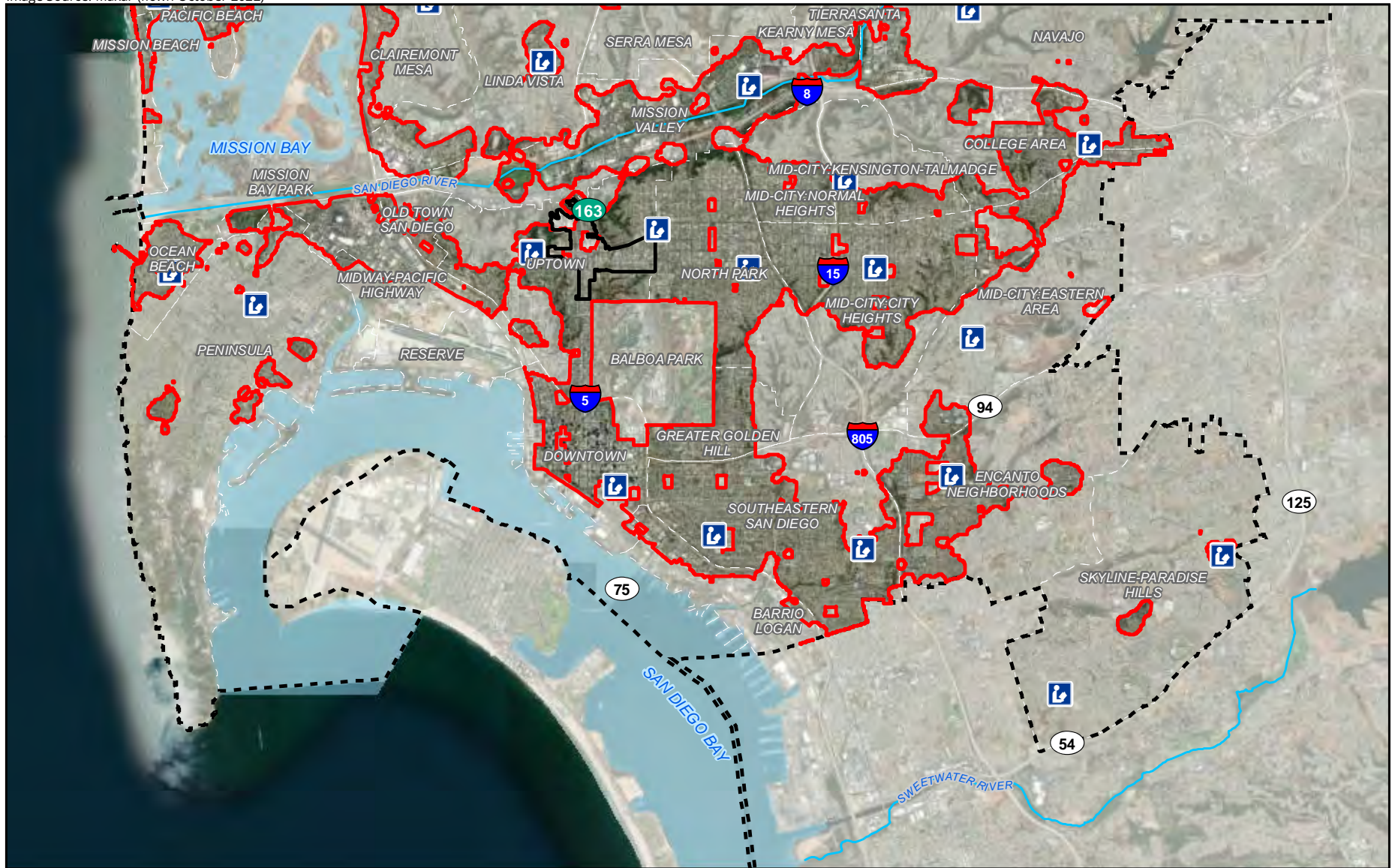






FIGURE 4.12-3a  
Libraries in Relation to the Project Areas - South





-  Library
-  Hillcrest Focused Plan Amendment Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

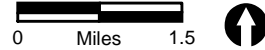
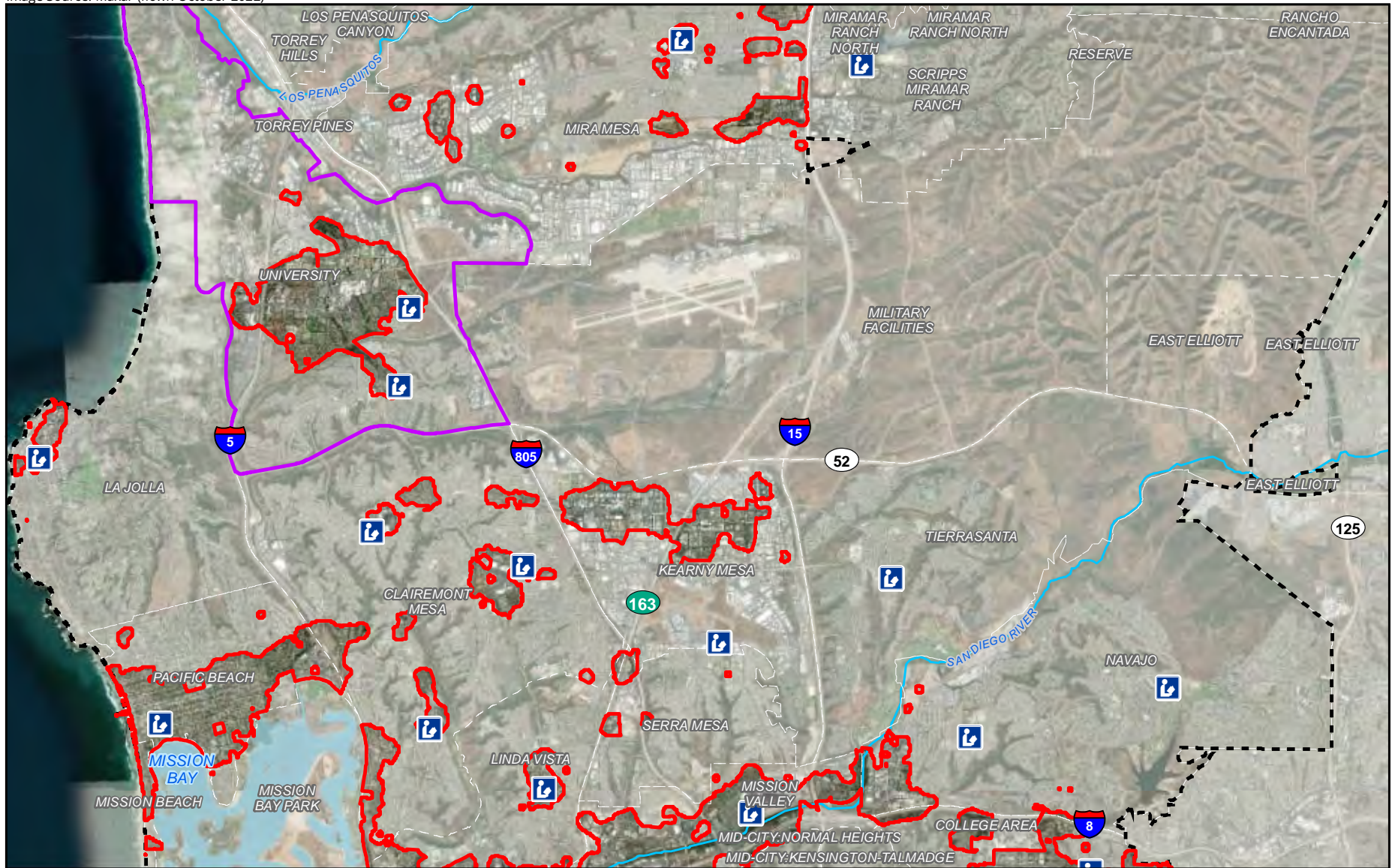






FIGURE 4.12-3b  
Libraries in Relation to the Project Areas - South Central





-  Library
-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

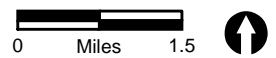
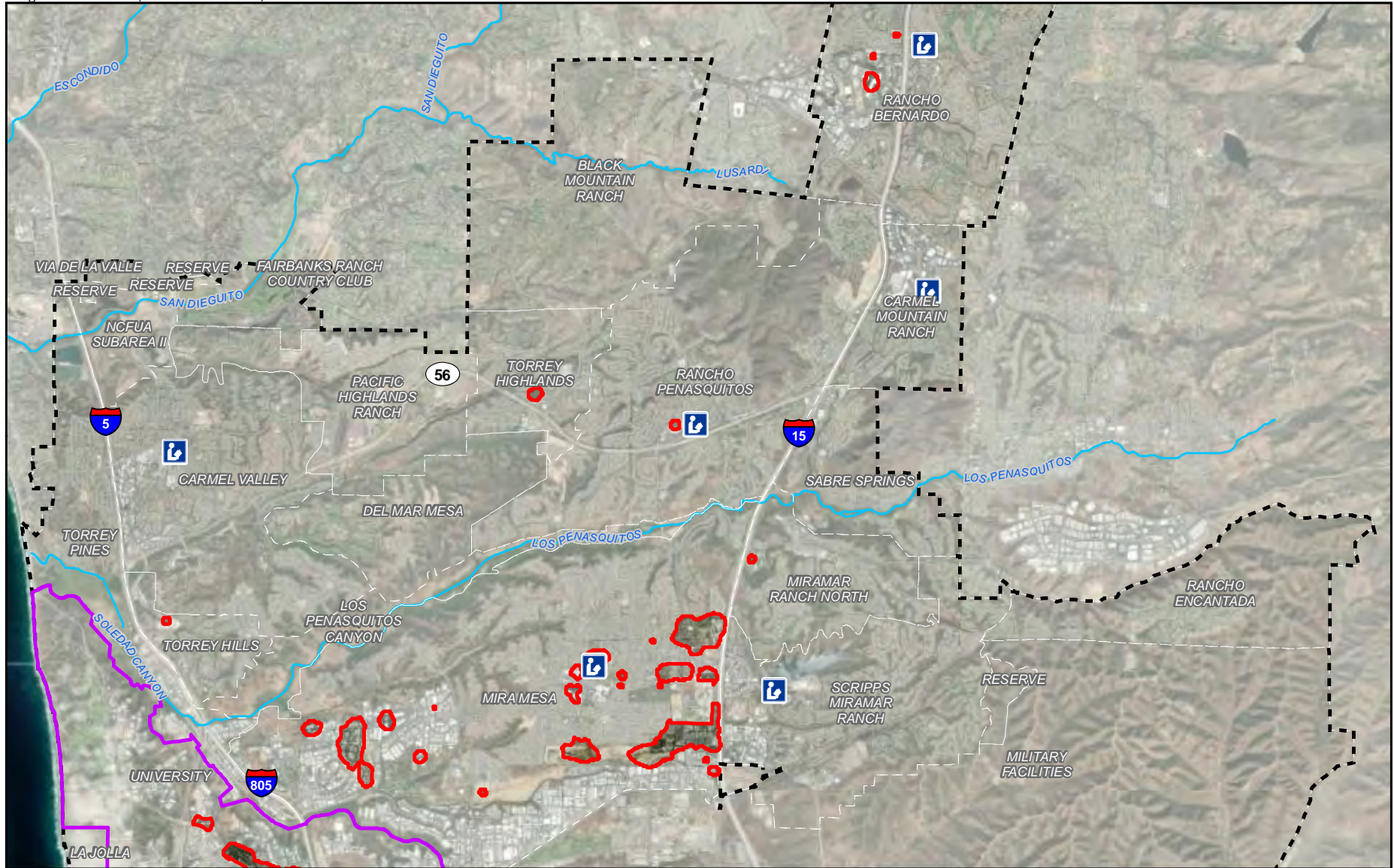






FIGURE 4.12-3c  
Libraries in Relation to the Project Areas - North Central





-  Library
-  University Community Plan Update Area
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

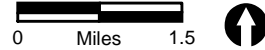
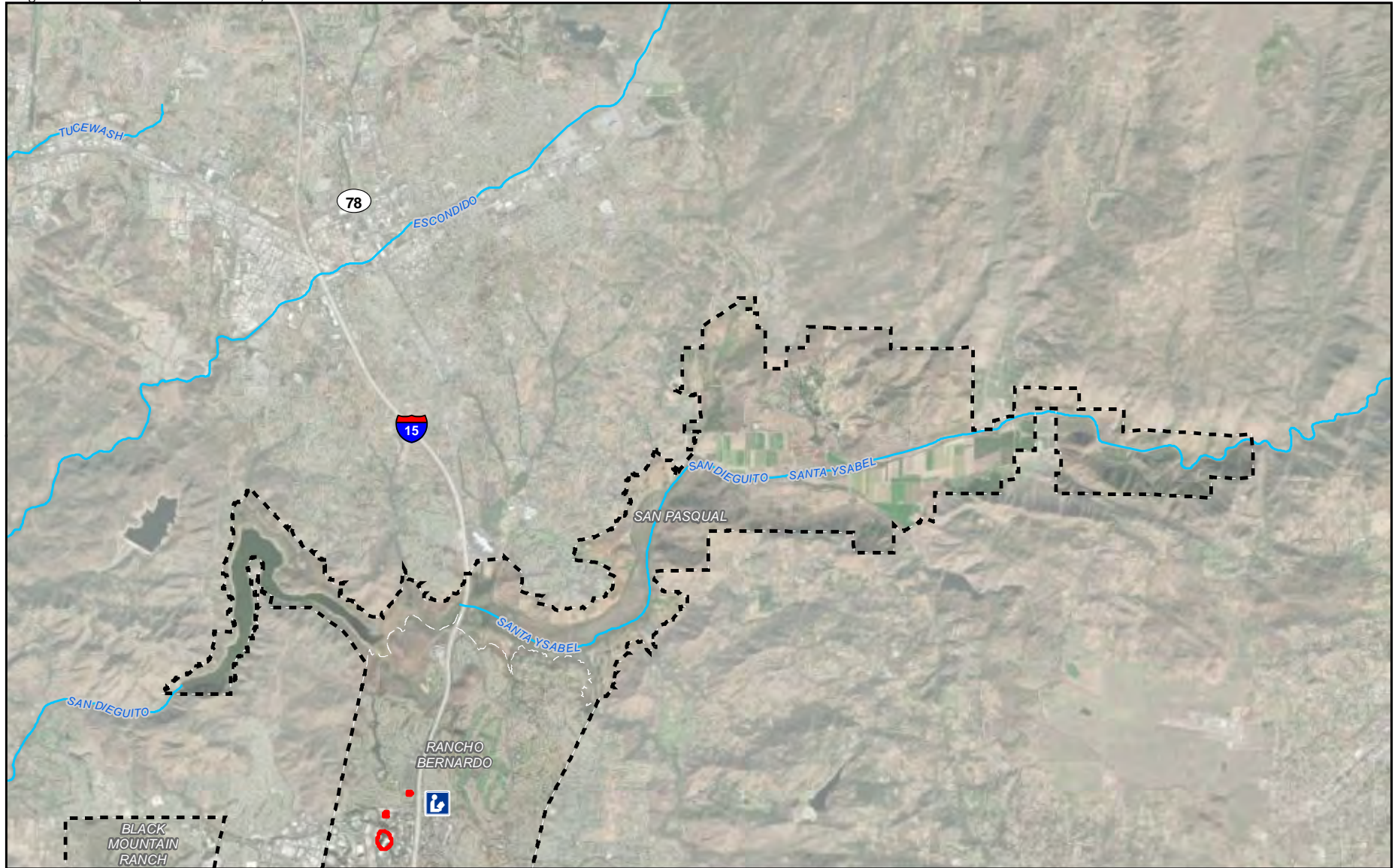





FIGURE 4.12-3d  
Libraries in Relation to the Project Areas - North





-  Library
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits

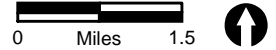


FIGURE 4.12-3e  
Libraries in Relation to the Project Areas - Northeast

<b>Table 4.12-11 Library Master Plan – Planning Zones</b>	
Zone	Neighborhood Libraries
A	Existing: Carmel Mountain Ranch; Carmel Valley; Mira Mesa; Rancho Bernardo; Rancho Peñasquitos; Scripps Miramar Ranch; Pacific Highlands Ranch. Proposed: Net New Zone A Library
B	Existing: Balboa; Clairemont; La Jolla/Riford; Linda Vista; North Clairemont; North University Community; Pacific Beach/Taylor; Serra Mesa-Kearny Mesa; University Community. Proposed: Net New Zone B Library
C	Existing: Allied Gardens/Benjamin; San Carlos; Tierrasanta. Proposed: None
D	Existing: Mission Hills-Hillcrest/Knox; Mission Valley; North Park; Ocean Beach; Point Loma/Hervey; University Heights. Proposed: None
E	Existing: City Heights/Weingart; College-Rolando; Kensington-Normal Heights; Logan Heights; Mountain View/Beckwourth; Oak Park; Paradise Hills; Skyline Hills; Valencia Park/Malcolm X. Proposed: None
G	Existing: Otay Mesa-Nestor; San Ysidro. Proposed: Net New Zone G Library
SOURCE: City of San Diego 2023c	

## **b. Hillcrest Focused Plan Amendment**

The Uptown Community Planning area, including the Hillcrest FPA area, is served by two libraries: the Mission Hills-Hillcrest/Knox Library located at 215 West Washington Street, and the University Heights Library located at 4193 Park Boulevard. Both libraries offer access to the internet and a wide variety of programming. The Uptown Community Planning area is located in the Library Master Plan's Zone D–Downtown/South area. As discussed in the Library Master Plan, Zone D's libraries come close to providing enough space for its current population. However, additional library space would be needed to accommodate strong projected population growth in this part of the City. To ensure capacity for future growth, the Library Master Plan recommends at least approximately 123,000 to 136,000 square feet of library space be added in Zone D. Key facility recommendations for Zone D libraries include expanding the Mission Valley Library, replacing the North Park Library, expanding and renovating the Ocean Beach Library, and replacing the University Heights Library.

## **c. University Community Plan Update**

There are two libraries located in the University CPU area. The University Community Library is located at 4155 Governor Drive in the southern part of the University CPU area. The North University

Community Library is located at 8820 Judicial Drive in the central part of the University CPU area. Both libraries offer access to the internet and a wide variety of programming.

The University CPU area is in Zone B–North/Downtown of the Library Master Plan. The Library Master Plan identifies Zone B as one of the zones in need of an additional library facility to meet the existing demands of the area. The Library Master Plan recommends the renovation and expansion of the existing 16,000-square-foot North University Community Library to 25,000-square-foot and the replacement of the existing 10,000-square-foot University Community Library on the same site with a larger 25,000-square-foot library facility.

## **4.12.2 Regulatory Setting**

### **4.12.2.1 State Regulations**

#### **a. Assembly Bill 2926**

Assembly Bill 2926, passed in 1986, allows school districts to collect impact fees from developers of new residential and commercial/industrial building space to assist in providing school facilities for students. Development Impact Fees are also referenced in the 1987 Leroy Greene Lease-Purchase Act, which requires school districts to contribute a matching share of costs for construction, modernization, and reconstruction projects.

#### **b. Senate Bill 50 (Statutes of 1998), State School Funding, Education Code Section 17620**

California Education Code Section 17620 establishes the authority of any school district to levy a fee, charge, dedication, or other requirements against any development within the school district for the purposes of funding the construction of school facilities, as long as the district can show justification for the fees. Senate Bill (SB) 50, adopted in 1998, limits the power of cities and counties to require mitigation of school facilities impacts as a condition of approving new development. It also authorizes school districts to levy statutory developer fees at levels higher than previously allowed and according to new rules.

#### **c. California Government Code Section 65995**

The Office of Public School Construction, State Allocation Board, sets the per-square-foot Level 1 school impact fees. Alternative School Fees (Level II and Level III fees) may also be collected by districts meeting certain requirements. California law currently requires a development fee of \$4.79 per square foot of residential construction over 499 square feet, and \$0.78 per square foot of any amount of converted and enclosed commercial or industrial construction, to assist in financing facilities needed to serve growth. Pursuant to Government Code Section 65995, payment of development impact fees would provide for full and complete mitigation of school capacity impacts.

## **d. California Fire Code**

The 2022 California Fire Code (Fire Code) (California Code of Regulations Title 24, Part 9) establishes regulations to safeguard against the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The Fire Code also establishes requirements intended to provide safety for and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout California. The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety during construction and demolition, and wildland-urban interface areas.

### **4.12.2.3 Local Regulations**

#### **a. City of San Diego Municipal Code**

##### ***Fire Protection***

SDFD has an active program that promotes the clearing of canyon vegetation away from structures in accordance with Section 142.0412 of the San Diego Municipal Code (see Section 4.18.2.3 of this PEIR for more details) and the SDFD's Canyon Fire Safety guidelines and policies related to brush management. The City thins brush on City property within 100 horizontal feet of a previously conforming structure unless a site-specific report, which indicates that a greater distance is necessary, is approved by the SDFD [per SDMC Section 142.0412(i)] or a previously recorded entitlement requires a width more or less than the standard 100 feet. Other fire prevention measures include adopting safety codes and an aggressive brush management program. Citywide fire service goals, policies, and standards are identified in the Public Facilities, Services, and Safety Element of the General Plan and the SDFD's Standards of Response Coverage Deployment Study.

#### **b. City of San Diego General Plan**

The **Public Facilities, Services, and Safety Element** of the General Plan includes policies on the prioritization and provision of public facilities and services, evaluation of new growth, guidelines for implementing a financing strategy, and guidelines for the provision of specific facilities. Applicable General Plan policies, including new and/or updated policy language applicable to public services include the following.

##### ***Fire Protection***

The Public Facilities, Services, and Safety Element of the General Plan establishes fire response goals, standards, and policies. Policy PF-D.1 establishes response time standards as follows:

- a) To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This

equates to 1-minute dispatch time, 1.5 minutes company turnout time, and 5 minutes drive time in the most populated areas.

- b) To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911 call receipt in fire dispatch, 90 percent of the time.
- This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to five medical patients at once.
  - This equates to 1-minute dispatch time, 1.5 minutes company turnout time, and 8 minutes drive time spacing for multiple units in the most populated areas.

To direct fire station location timing and crew size planning as a community grows, fire unit deployment performance measures are established based on population density zones, which are provided in Table PF-D.1 of the Public Facilities, Services, and Safety Element and are shown above in Table 4.12-3.

Per PF-D.2, the City determines fire station needs, location, timing, and crew size planning as the population of the City grows. Where more than one square mile is not populated at similar densities, and/or a contiguous area with different density types aggregate into a population cluster area, the standards as shown in Table PF-D.2 of the Public Facilities, Services, and Safety Element and in Table 4.12-12 below, Deployment Measures to Address Future Growth by Population Clusters, are referenced to guide the determination of response time measures and the need for fire stations. If the SDFD is not meeting first-due unit travel times, additional facilities may be necessary.

Area	Aggregate Population	First-Due Unit Travel Time Goal
Metropolitan	>200,000 people	4 minutes
Urban-Suburban	<200,000 people	5 minutes
Rural	500-1,000 people	12 minutes
Remote	<500 people	>15 minutes
SOURCE: City of San Diego 2023b		

### **Police Protection**

The Public Facilities, Services, and Safety Element establishes average police response time goals. According to PF-E.2, the City's goal is to maintain average police response times as development increases and the population grows. Average response time goals are as follows:

- Priority E Calls (imminent threat to life) within seven minutes.
- Priority 1 Calls (serious crimes in progress) within 12 minutes.
- Priority 2 Calls (less serious crimes with no threat to life) within 30 minutes.
- Priority 3 Calls (minor crimes/requests that are not urgent) within 90 minutes.
- Priority 4 Calls (minor requests for police service) within 90 minutes.

### ***Schools***

The Public Facilities, Services, and Safety Element provides policies that support the development of public and private school systems and educational facilities that provide opportunities for students and that are equitable, safe, healthy, and welcoming for all students, parents, and community members. These policies include, but are not limited to, the following: PF-K.1, which calls on the City to assist school districts and other educational authorities in resolving problems arising over the availability of schools and educational facilities in all areas of the City; PF-K.6, which directs the City to expand and continue the joint use of schools with adult education, civic, recreational, and community programs, and also for public facility opportunities; and PF-K.9, which encourages the City to support school districts in their evaluations of school site utilization and potential opportunities for public acquisition, joint use, or other opportunities.

### ***Libraries***

The Public Facilities, Services, and Safety Element establishes policies intended to guide the development and enhancement of the City's library system. These policies support the expansion and renovation of library facilities so that they are equitable and continue to support unique community needs. Policies include, but are not limited to, the following: PF-J.2, which directs the City to design all new libraries with a minimum of 25,000 square feet of dedicated library space for branch libraries, with adjustments for community-specific needs; PF-J.3, which calls on the City to plan for larger library facilities that can serve multiple communities and accommodate sufficient space to serve the larger service area and maximize operational and capital efficiencies; PF-J.5, which states that new library facilities should be planned so that they can maximize accessibility to village centers, public transit, or schools; and PF-J.7, which supports the joint use of libraries with other compatible community facilities and services including other City operations.

## **c. City of San Diego Library Master Plan**

The City adopted a Library Master Plan on November 6, 2023, which provides a long-range guide for future City investment in library spaces and facilities. The plan envisions library facilities that align with community needs, interests, and priorities and that: 1) are welcoming, well-functioning, and well-maintained; 2) ensure equitable access to library services and spaces throughout the City; 3) optimize staff effectiveness; and 4) have the capacity to serve the City's current and projected future population. The plan is intended to be a flexible, "living" document with clear principles and guidelines. The plan includes recommendations for upgrades to existing facilities as well as potential new facilities. Chapter 8, Implementation, of the Library Master Plan provides an overview of the capital improvement strategies that are recommended for the City's library facilities. Chapter 9, Facility Recommendations, of the Library Master Plan provides a list of the specific recommendations for each City library facility.

## **d. Build Better SD**

Build Better SD is a planning initiative adopted by the City Council on August 1, 2022, to enable the faster delivery of public spaces and buildings equitably and sustainably across the City. The initiative supports the City's equity, access, conservation, and sustainability goals in addition to furthering the



City's housing goals by providing the infrastructure needed to support new homes for all residents. The initiative amended the General Plan with new policies to prioritize investments in areas with the greatest needs and create opportunities to gather community input. The initiative also included amendments to the LDC to promote equitable investments in public spaces and mobility improvements, updated the City's Regional Transportation Congestion Improvement Program, and updated the City's Development Impact Fee structure to streamline public investments and further equitable policies, with an emphasis on prioritizing investment in neighborhoods with the greatest needs and delivering infrastructure to more people, more quickly.

### 4.12.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to public services are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (City of San Diego 2022d). The following issue question is addressed in this section:

- 1) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services, including fire protection, police protection, schools, and libraries?

### 4.12.4 Impact Analysis

#### Issue 1 Public Facilities

*Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services, including fire protection, police protection, schools, and libraries?*

#### a. Fire Protection

##### ***Blueprint SD Initiative***

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative Climate Smart Village Areas. ~~Although the~~ The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore,

potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas.

As stated above in Section 4.12.1.1a, there are currently 52 fire stations located throughout the City as well as nine permanent lifeguard stations (31 seasonal stations during peak period), and the City has identified future planned fire stations as shown in Table 4.12-1, above. Implementation of the Blueprint SD Initiative would increase development intensities that support higher density residential development and mixed-use development throughout the City, especially within the Climate Smart Village Areas. The increase in density and associated demand for fire-rescue services could require the provision of new and/or improved fire stations and fire apparatus in order to maintain fire-rescue service ratios, response times, and other performance objectives, although actual needs and potential locations would be determined in the future as development occurs.

SDFD commissions a Standards of Response Coverage review every five years, or as needed. This report is used to determine the need for additional fire stations by reviewing the adequacy of the current fire station resource deployment system, the risks to be protected and the emergency incident outcomes desired by the community. Service delivery depends on the availability of adequate equipment, sufficient numbers of qualified personnel, effective alarm/monitoring systems, and proper siting of fire stations and lifeguard towers. As fire-rescue facilities and equipment continue to age, new investments may be needed to support growth patterns and maintain levels of service to ensure public safety. An evaluation of the need for additional new or expanded fire stations would occur through the Standards of Response Cover Review, and through CPUs and amendments as needed.

The construction and operation of new and/or improved fire stations in the future could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future fire station projects are proposed, they would require a separate environmental review and compliance with regulations in existence at that time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these fire stations. However, as the location and need for potential future fire stations cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future fire stations would be mitigated to a less than significant level, impacts would be potentially significant.

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

As discussed in Section 4.12.1.1b of this PEIR, the Uptown Community Planning area, including the Hillcrest FPA area, is served by Fire Stations 3, 5, and 8. No new fire stations are proposed as part of the Hillcrest FPA; however, the Hillcrest FPA includes Policy FP-1.7, which calls for maintaining the high level of fire protection throughout Uptown, including supporting efforts by the City to educate and inform the community regarding fire prevention techniques, and supporting the regular upgrading of Uptown's fire stations as necessary to adequately respond to fires and emergencies. Buildout of the proposed Hillcrest FPA would add approximately 17,500 dwelling units to the Hillcrest FPA area (see Section 3.5.2 of this PEIR). The increase in residential density and associated demand for fire-rescue services could require the provision of new and/or improved fire stations

and fire apparatus in order to maintain fire-rescue service ratios, response times, and other performance objectives, although actual needs and potential locations would be determined in the future as development occurs.

The construction and operation of new and/or improved fire stations in the future could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future fire station projects are proposed, they would require a separate environmental review and compliance with regulations in existence at that time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these fire stations. However, as the location and need for potential future fire stations cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future fire stations would be mitigated to less than significant, impacts would be potentially significant.

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

As discussed in Section 4.12.1.1c of this PEIR, the University CPU area is served by Fire Stations 35 and 50, and a new fire station, Fire Station 52, is currently under construction. No new fire stations are proposed as part of the University CPU. The University CPU includes policies that address the provision of fire-rescue services within the University CPU area, including 7.2A, which calls on the City to maintain sufficient fire-rescue and police services to meet the demands of continued growth and development in University; and 7.2B, which supports the upgrades, modernization of facilities and equipment, and/or expansion of the stations serving the University CPU area, as necessary, to adequately respond to fires and emergencies. The proposed University CPU would result in a potential buildout of ~~an additional~~ approximately 57,000 dwelling units, or approximately 30,480 additional dwelling units compared to the existing condition (see Table 3-5 of this PEIR). The increase in residential density and associated demand for fire-rescue services could require the provision of new and/or improved fire stations and fire apparatus in order to maintain fire-rescue service ratios, response times, and other performance objectives, although actual needs and potential locations would be determined in the future as development occurs. The construction and operation of new and/or improved fire stations in the future could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future fire stations are proposed, they would require a separate environmental review and compliance with regulations in existence at that time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of new fire stations. However, as the location and need for potential future fire stations cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future fire facilities would be mitigated to less than significant, impacts would be potentially significant.

## b. Police Protection

### ***Blueprint SD Initiative***

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative Climate Smart Village Areas. ~~Although the Blueprint SD Initiative's~~ policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas.

As stated above in Section 4.12.1.2a, there are currently 12 SDPD facilities in the City and the SDPD has three new facility projects planned in its Fiscal Year 2024-2028 Five-Year Capital Infrastructure Planning Outlook. Implementation of the Blueprint SD Initiative would increase development intensities that support higher density residential development and mixed-use development throughout the City, especially within the Climate Smart Village Areas. The increase in density and associated demand for police services could require the provision of new and/or improved police facilities in order to maintain police service ratios, response times, and other performance objectives, although actual needs and potential locations would be determined in the future as development occurs.

As detailed in the Public Facilities, Services and Safety Element Policy PF-E.7, the need for additional police resources and related capital improvements is analyzed when total annual police force out-of-service time incrementally increases by approximately 125,000 hours over the baseline of 740,000 in a given year. Out-of-service time is defined as the time it takes a police unit to resolve a call for service after it has been dispatched to an officer. As development and growth continue in the City, additional infrastructure, including additional police facilities, could be required to maintain the City's established police response time goals to ensure public safety.

The construction and operation of new and/or improved police facilities in the future could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future police facility projects are proposed, they would require a separate environmental review and compliance with regulations in existence as well as any additional project-specific mitigation measures at that time would reduce potential environmental impacts related to the construction and operation of these police facilities. However, as the location and need for potential future police facilities cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future police facilities would be mitigated to a less than significant level, impacts would be potentially significant.

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

As discussed in Section 4.12.1.2b, the Hillcrest FPA area is served by the Central and Western Divisions of the SDPD and by Beats 627, 624, and 626. No new police facilities are proposed as part of the Hillcrest FPA. Regarding police services in the Uptown Community Planning area, the Uptown Community Plan includes Policy PF-1.6, which calls for reducing incidences of criminal activity within the Uptown neighborhoods, including support for Neighborhood Watch and Community Alert Programs; close relationships and continuing exchange of information with patrol officers, development of Community Alert Programs where they do not presently exist, increased foot patrols to areas of high crime, development projects that provide adequate lighting and visibility for surveillance, and gradations between public and private spatial territories.

Buildout of the Hillcrest FPA would increase residential density and associated demand for police services in the Hillcrest FPA area and in the Uptown Community Planning area, which could result in the need for additional police stations to maintain police service ratios, response times, and other performance objectives, although actual needs and potential locations would be determined in the future as development occurs. The construction and operation of new and/or improved police facilities in the future could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future police station projects are proposed, they would require a separate environmental review and compliance with regulations in existence at that time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these police stations. However, as the location and need for potential future police stations cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future police facilities would be mitigated to a less than significant level, impacts would be potentially significant.

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

As discussed in Section 4.12.1.2c, the University CPU area is served by the Northern and Northwestern Divisions of the SDPD and by Beats 126, 115, 932, and 933. No new police stations are proposed as part of the University CPU. The University CPU includes policies which address the provision of police services within the University CPU area, including 7.2A, which calls on the City to maintain sufficient fire-rescue and police services to meet the demands of continued growth and development in University; and 7.2B, which supports the upgrades, modernization of facilities and equipment, and/or expansion of the stations serving the CPU area, as necessary, to adequately respond to fires and emergencies. Buildout of the University CPU would increase residential density and associated demand for police services in the University CPU area, which could result in the need for additional police stations to maintain police service ratios, response times, and other performance objectives, although actual needs and potential locations would be determined in the future as development occurs. The construction and operation of new and/or improved police facilities in the future could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future police station projects are proposed, they would require a separate environmental review and compliance with regulations in existence at

that time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these police stations. However, as the location and need for potential future police stations cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future police facilities would be mitigated to a less than significant level, impacts would be potentially significant.

## c. Schools

### ***Blueprint SD Initiative***

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative Climate Smart Village Areas. ~~Although the~~ The Blueprint SD Initiative's' policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas.

The Blueprint SD Initiative project areas, including the Climate Smart Village Areas, are served by SDUSD and 16 other smaller school districts which serve students from kindergarten through 12<sup>th</sup> grade. Implementation of the Blueprint SD Initiative would increase development intensities that support higher density residential development and mixed-use development throughout the City, especially within the Climate Smart Village Areas. The increase in density could exceed the capacity of existing school facilities in the project areas and additional school facilities could be required, although the actual needs and potential locations would be determined in the future as development occurs.

Government Code Sections 65995 and Education Code Section 17620 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. SB 50, enacted on August 27, 1998, substantially revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation provides that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project-related impacts to school facilities. As such, the City is legally prohibited from imposing any additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. Pursuant to these state laws, the school district is the authorized agency to collect mitigation fees to be used for school facilities and is SDUSD would be responsible for any potential expansion of existing and/or development of new school facilities. This process is outside the jurisdiction of the City and therefore cannot be used as mitigation for this project.



While the payment of fees would provide the funding for school districts to address future school capacity needs, the potential increase in students from implementation of the Blueprint SD Initiative could impact school facilities' capacity and could require the construction of new school facilities. Future school projects would be required to undergo project-specific environmental review at which time environmental impacts would be identified and addressed. However, as the location and need for potential future schools cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. While the school district SDUSD would be responsible for the potential expansion of existing and/or development of new school facilities, potential physical impacts associated with the construction and operation of future school sites are not known at this time. Thus, as it cannot be ensured that all impacts associated with the construction and operation of future schools would be mitigated to a less than significant level, impacts would be potentially significant.

### **Hillcrest Focused Plan Amendment**

The Hillcrest FPA area is served by SDUSD. The anticipated buildout of the Hillcrest FPA would result in the addition of approximately 17,218,500 dwelling units within the Hillcrest FPA area compared to the adopted Uptown Community Plan (see Table 3-1 of this PEIR). The analysis provided by SDUSD in Table 4.12-13 below is a conservative calculation based on an earlier buildout scenario of approximately 18,000 dwelling units that was previously proposed for the Hillcrest FPA. SDUSD student generation rates are based on the type of project, number of units, bedroom mix, affordable or age-restricted housing components, proximity to schools and other amenities, neighborhood, and other factors. The SDUSD does not provide district standards or school-specific generation rates. Typically, to provide student generation rates for new residential development, the SDUSD would research similar nearby developments and their student generation rates as a guide for how many students the new development may generate. However, as the Hillcrest FPA does not contain some of the factors used to determine generation rates, SDUSD estimated student generation rates based on the current total housing types and students residing in each housing type.

<b>Table 4.12-13 Student Generation Rates from Existing Housing Units by Type in the Uptown Community Planning Area (2020)</b>			
<b>Housing Type</b>	<b>Estimated Existing Housing Units in the Uptown Community Planning Area in 2020</b>	<b>2023-24 SDUSD Students (UTK-5, 6-8, 9-12, and UTK-12)</b>	<b>Student Generation Rates</b>
Single Family	7,684	UTK-5: 532 6-8: 242 9-12: 275 UTK-12: 1,049 (total)	UTK-5: 0.069 6-8: 0.031 9-12: 0.036 UTK-12: 0.137 (total)
Multi Family	15,499	UTK-5: 230 6-8: 100 9-12: 111 UTK-12: 441 (total)	UTK-5: 0.15 6-8: 0.006 9-12: 0.007 UTK-12: 0.028
UTK = Universal Transitional Kindergarten SOURCE: Appendix I-1 (Hillcrest FPA Student Generation Letter)			

Potential student generation rates for future development within the Hillcrest FPA area are shown in Table 4.12-14.

Table 4.12-14 Potential Student Generation from Implementation of the Uptown Community Plan Update (Beyond 2050)							
Housing Type	Student Generation Rates			Increase in Residential Housing Units Assumed with Buildout of Uptown Community Plan including growth within the Hillcrest FPA	Number of Potential Students Generated from Increased Number of Housing Units		
		Low	High			Low	High
Single Family				+213			
	UTK-5:	0.069	0.138		UTK-5:	15	29
	6-8:	0.031	0.062		6-8:	7	13
	9-12:	0.036	0.071		9-12:	8	15
	UTK-12:	0.137	0.273		UTK-12:	29	58
Multi Family				+31,204			
		Low	High			Low	High
	UTK-5:	0.15	0.03		UTK-5:	468	936
	6-8:	0.006	0.013		6-8:	187	374
	9-12:	0.007	0.014		9-12:	218	437
	UTK-12:	0.028	0.057	UTK-12:	874	1,747	

UTK = Universal Transitional Kindergarten  
 SOURCE: Appendix I-1 (Hillcrest FPA Student Generation Letter)  
 NOTE: The estimated residential housing units assumed with buildout of the Hillcrest FPA evaluated here is conservative as it estimates an increase in 31,417 housing units while the proposed estimated increase in residential units is compared to buildout of the current Uptown Community is 29,635 units as detailed in Table 3-1 of this PEIR.

As detailed in Appendix I-1, SDUSD expects the existing middle and high school facilities in the Uptown Community Planning area to likely be sufficient to accommodate potential increased enrollment resulting from development anticipated from build out of the Hillcrest FPA. Measures such as a reduction of students from outside of the Uptown community attending the two schools would likely be sufficient to create available space for potential enrollment growth in the future.

However, the estimated number students that could result from implementation of the Hillcrest FPA is highly likely to exceed the capacity of current SDUSD facilities at the elementary school level, which would likely require the construction of new elementary school facilities. The elementary schools in the Uptown Community Planning area are located on sites that restrict further expansion. The SDUSD does not currently have any long-range facility plans that could accommodate the estimated number of students that would result from build-out of the Hillcrest FPA. In particular, land for a new school is likely to be needed in the Hillcrest area of Uptown, in the vicinity of Fourth and Fifth Avenues and Pennsylvania Avenue. No new schools are proposed as part of the Hillcrest FPA; however, the Uptown Community Plan includes Policy PF-1.10d, which encourages SDUSD to engage the community in planning for new and expanded facilities and PF-1.11, which encourages coordination with SDUSD to source funding for and the planning of new school facilities.

Government Code Sections 65995 and Education Code Section 17620 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. SB 50, enacted on August 27, 1998, substantially revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation provides that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project-related impacts to school facilities. As such, the City is legally prohibited from imposing any additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. Pursuant to these state laws, the school district is the authorized agency to collect mitigation fees to be used for school facilities and is SDUSD would be responsible for any potential expansion of existing and/or development of new school facilities. This process is outside the jurisdiction of the City and therefore cannot be used as mitigation for this project.

While the payment of fees would provide the funding for school districts to address future school capacity needs, the potential increase in students from implementation of the Hillcrest FPA could impact the capacity of existing schools and could require the construction of new school facilities. Future school projects would be required to undergo project-specific environmental review at which time environmental impacts would be identified and addressed. However, as the location and need for potential future schools cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. While SDUSD would be responsible for the potential expansion and/or development of new school facilities, potential physical impacts associated with the construction and operation of future school sites are not known at this time. Thus, as it cannot be ensured that all impacts associated with the construction and operation of future schools would be mitigated to a less than significant level, impacts would be potentially significant.

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

The University CPU area is served by SDUSD. The anticipated buildout of the University CPU would result in the addition of approximately 30,480 dwelling units over existing conditions within the University CPU area. The analysis provided by SDUSD in Table 4.12-16 below is a conservative calculation because it assumes a build-out of 30,308 additional units compared to the adopted University Community Plan; whereas the proposed change from the adopted plan would result in approximately 29,000 units (see Table 3-5 of this PEIR). SDUSD student generation rates are based on the type of project, number of units, bedroom mix, affordable or age-restricted housing components, proximity to schools and other amenities, neighborhood, and other factors. SDUSD does not provide district standards or school-specific generation rates. Typically, to provide student generation rates for new residential development, the district would research similar nearby developments and their student generation rates as a guide for how many students the new development may generate. However, as the University CPU does not contain some of the factors used to determine generation rates, SDUSD estimated student generation rates based on current total housing types and students residing in each housing type.

Table 4.12-15 Student Generation Rates from Existing Housing Units by Type in the University CPU Area (2022)					
Housing Type	Estimated Existing Housing Units in the University CPU Area in 2022	20202-23 SDUSD Students (TK-5, 6-8, 9-12, and UTK-12)		Student Generation Rates	
Single Family	5,213	TK-5:	672	TK-5:	0.129
		6-8:	281	6-8:	0.054
		9-12:	437	9-12:	0.084
		TK-12:	1,390	TK-12:	0.267
Multi Family	21,912	TK-5:	1,143	TK-5:	0.052
		6-8:	397	6-8:	0.018
		9-12:	479	9-12:	0.022
		TK-12:	2,019	TK-12:	0.092

TK = Transitional Kindergarten; UTK = Universal Transitional Kindergarten  
 1. SANDAG 2022 Estimates, Open Data Portal, July 31, 2023, accessed September 5, 2023  
 2. SanGIS/SANDAG GIS Data Warehouse, 2021 Land Use  
 SOURCE: Appendix I-2 (University CPU Student Generation Letter)

Potential student generation rates for future development within the University CPU area are shown in Table 4.12-16.

Table 4.12-16 Potential Student Generation from Implementation of the University CPU						
Housing Type	Student Generation Rates		Increase in Residential Housing Units Assumed with Buildout of the University CPU	Number of Potential Students Generated from Increased Number of Housing Units		
Single Family	Not applicable		No change from current conditions.			
Multi Family	TK-5:	0.052	+30,308	TK-5:	1,576	936
	6-8:	0.018		6-8:	546	374
	9-12:	0.022		9-12:	667	437
	TK-12:	0.092		TK-12:	2,789	1,747

TK = Transitional Kindergarten  
 SOURCE: Appendix I-2 (University CPU Student Generation Letter)

SDUSD expects the existing middle and high school facilities in the University CPU area to likely be sufficient into the future to accommodate potential increased enrollment from implementation of the University CPU. Measures such as a reduction of students from outside the University community attending the two schools will likely be sufficient to create available space for potential enrollment growth in the future.

However, the estimated number of students that could result from implementation of the University CPU is highly likely to exceed the capacity of current SDUSD facilities at the elementary school level, which would likely require significant expansion of existing school facilities, or construction of new facilities at the elementary school level. SDUSD does not currently have any long-range facility plans that could accommodate the estimated number of generated students. In particular, land for new

schools is likely to be needed in the northern section of the University CPU area, in the vicinity of La Jolla Village Drive and Genesee Avenue intersection.

No new schools are proposed as part of the University CPU; however, the University CPU includes policies that support the provision of school facilities to serve the University CPU area. Policies include, but are not limited to, 7.3B, which directs the City to coordinate with SDUSD to explore options for the provision of pre-kindergarten to 12<sup>th</sup> grade educational facilities to serve future students within University, as needed including a potential elementary school facility within the vicinity of La Jolla Village Drive and Genesee Avenue; 7.3D, which encourages collaboration between SDUSD, UCSD, and other educational centers for siting school facilities; 7.3F, which encourages the establishment of charter schools within the community mixed-use village areas; and 7.3G, which encourages the expansion of accessible educational facilities for families and adult learners.

Government Code Sections 65995 and Education Code Section 17620 authorize school districts to impose facility mitigation fees on new development to address any increased enrollment that may result. SB 50, enacted on August 27, 1998, substantially revised developer fee and mitigation procedures for school facilities as set forth in Government Code Section 65996. The legislation provides that an acceptable method of offsetting a project's effect on the adequacy of school facilities is payment of a school impact fee prior to issuance of a building permit. Once paid, the school impact fees would serve as mitigation for any project-related impacts to school facilities. As such, the City is legally prohibited from imposing any additional mitigation related to school facilities, as payment of the school impact fees constitutes full and complete mitigation. Pursuant to these state laws, the school district is the authorized agency to collect mitigation fees to be used for school facilities and is SDUSD would be responsible for any potential expansion of existing and/or development of new school facilities. This process is outside the jurisdiction of the City and therefore cannot be used as mitigation for this project.

While the payment of fees would provide the funding for school districts to address future school capacity needs, the potential increase in students from implementation of the University CPU could impact the capacity of existing schools and could require the construction of new school facilities. Future school projects would be required to undergo project-specific environmental review at which time environmental impacts would be identified and addressed. However, as the location and need for potential future schools cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. While the school district would be responsible for the potential expansion of existing and/or development of new school facilities, potential physical impacts associated with the construction and operation of future school sites are not known at this time. Thus, as it cannot be ensured that all impacts associated with the construction and operation of future schools would be mitigated to a less than significant level, impacts would be potentially significant.

## d. Libraries

### ***Blueprint SD Initiative***

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative Climate Smart Village Areas. ~~Although the~~ The Blueprint SD Initiative's' policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas.

The City's public library system includes 36 library facilities located throughout the City. Implementation of the Blueprint SD Initiative would increase development intensities that support higher density residential development and mixed-use development throughout the City, especially within the Climate Smart Village Areas. The increase in density and associated demand for library services could require the provision of new and/or improved library facilities in order to maintain library service ratios and other performance objectives, although actual needs and potential locations would be determined in the future as development occurs.

The City's Library Master Plan recommends a number of capital improvement strategies to ensure the City's library facilities can adequately serve the City's growing population. These strategies include facility replacements, renovations and/or expansions, makeovers, capital maintenance, and strategic investments. The Library Master Plan also recommends the addition of a new library facility of 25,000 square feet or more in Zones A, B, and G to meet each zone's branch library space per capita targets.

The construction and operation of new and/or improved library facilities in the future could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future library projects are proposed, they would require a separate environmental review and compliance with the regulations existing at the time as well as any additional project-specific mitigation measures would reduce potential environmental impacts associated with construction and operation of these library facilities. However, it is unknown what specific impacts may occur as the location and extent of impacts associated with the construction and operation of potential future libraries cannot be determined at this time. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future library facilities would be mitigated to a less than significant level, impacts would be potentially significant.

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

The Uptown Community Planning area, including the Hillcrest FPA area, is served by the Mission Hills-Hillcrest/Knox and University Heights libraries. No new libraries are proposed as part of the Hillcrest FPA; however, the Uptown Community Plan's policy framework supports the funding and



creation of new and expanded branch libraries to meet the community needs, such as the relocation of the University Heights Branch Library to the Teachers Training Annex at SDUSD's Education Center should the property become available (Policy PF-1.8). Additionally, the Library Master Plan recommends the replacement of the University Heights Library with a 25,000-square-foot facility and recommends that strategic investments in the Mission Hills-Hillcrest Knox Library should occur in order to maintain the library and keep it aligned with community interests.

Buildout of the Hillcrest FPA would increase residential densities and associated demand for library services within the Uptown Community Planning area and the FPA area and could result in the need for new and/or expanded library facilities to accommodate these additional densities and associated demand for library services. Future library facility projects would be subject to a separate environmental review and compliance with the regulations in existence at the time as well as any additional project-specific mitigation measures would reduce potential environmental impacts associated with construction and operation of these new library facilities. However, the potential specific impacts and extent of these impacts associated with the construction and operation of future library facilities is unknown at this time. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future library facilities would be mitigated to a less than significant level, impacts would be potentially significant.

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

The University CPU area is served by the North University Community Library and the University Community Library. No new libraries are proposed as part of the University CPU. The University CPU area is in Zone B of the Library Master Plan. The Library Master Plan recommends the provision of an additional library facility in Zone B, which is anticipated be located in the Clairemont Mesa community. The Library Master Plan also recommends the renovation and expansion of the North University Community Library to a 25,000-square-foot facility, and the replacement of the University Community Library with a 25,000-square-foot facility.

Buildout of the University CPU could result in additional residents within the University CPU area and associated demand for library services. Future library facility projects would be subject to a separate environmental review and compliance with the regulations existing at the time as well as any additional project-specific mitigation measures would reduce potential environmental impacts associated with construction and operation of these new library facilities. However, the potential specific impacts and extent of these impacts associated with the construction and operation of future library facilities is unknown at this time. Thus, as it cannot be ensured that all impacts associated with the construction and operation of future library facilities would be mitigated to a less than significant level, impacts would be potentially significant.

## **Cumulative Impacts**

Infrastructure deficiencies exist in various areas throughout the City. As development occurs in accordance with the Blueprint SD Initiative, Hillcrest FPA, and University CPU, new and/or improved public services facility projects would likely be required to serve the additional density and associated demand for public services anticipated by the project. The policy framework within the Blueprint SD Initiative, Hillcrest FPA, and University CPU would support and facilitate the

construction and operation of new and/or improved public services facilities, including fire stations, police stations, schools, and libraries. Additionally, the City's Build Better SD Initiative, which created a citywide infrastructure funding program to streamline public investments to efficiently prioritize and address the infrastructure gaps throughout the City, ~~will help facilitate the construction of needed public services facilities and would result in broader public services infrastructure improvements that would reduce cumulative impacts to public services infrastructure in the City.~~ Investments will be prioritized in areas with the greatest needs and greatest growth in line with the General Plan's Recreation Element and Public Facilities Financing Plan polices. Future public services facilities projects would require a separate environmental review and compliance with regulations in existence at the time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these public facilities. Nevertheless, project-specific impacts as well as the extent of these impacts cannot be determined at this time; thus, impacts related to the construction and operation of these public facilities would remain significant and unavoidable. Incremental impacts associated with the construction and operation of these future public facilities are anticipated to be cumulatively considerable. Thus, cumulative impacts related to public services and facilities would be significant ~~and unavoidable.~~

## 4.12.5 Significance of Impacts

### 4.12.5.1 Public Facilities

#### a. Blueprint SD Initiative

Implementation of the Blueprint SD Initiative could result in the need for additional fire-rescue, police, school, and library facilities. As the location and need for potential future facilities cannot be determined at a program level of review, it is unknown what specific impacts, and the extent of these impacts may occur associated with the future construction and operation of such facilities. Future public services facilities projects would require a separate environmental review and compliance with regulations in existence at the time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these public services facilities. However, as it cannot be ensured that all impacts associated with the construction and operation of potential future public services facilities would be mitigated to less than significant, impacts would be significant.

#### b. Hillcrest Focused Plan Amendment

Implementation of the Hillcrest FPA could result in the need for additional fire-rescue, police, school, and library facilities. As the location and need for potential future facilities cannot be determined at the program level of review, it is unknown what specific impacts, and the extent of these impacts may occur associated with the future construction and operation of such facilities. Future public services facilities projects would require a separate environmental review and compliance with regulations in existence at the time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these public services facilities. However, as it cannot be ensured that all impacts associated with the

construction and operation of potential future public services facilities would be mitigated to less than significant, impacts would be significant.

### **c. University Community Plan Update**

Implementation of the University CPU could result in the need for additional fire-rescue, police, school, and library facilities. As the location and need for potential future facilities cannot be determined at this time, it is unknown what specific impacts, and the extent of these impacts may occur associated with the future construction and operation of such facilities. Future public services facilities projects would require a separate environmental review and compliance with regulations in existence at the time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these public services facilities. However, as it cannot be ensured that all impacts associated with the construction and operation of potential future public services facilities would be mitigated to a less than significant level, impacts would be significant.

## **4.12.6 Mitigation Monitoring and Reporting**

Implementation of the project could result in the need for new fire-rescue, police, school, and library facilities. The construction and operation of new and/or altered public facilities that may be needed would be subject to environmental review at the time of facility design and approval. While compliance with the existing regulations as well as any additional project-specific mitigation measures at the time future projects are proposed would serve to reduce potential environmental impacts associated with the development of these future public services facilities, impacts associated with the construction and operation of future public services facilities would remain significant ~~and unavoidable~~ as the specific impacts and extent of these impacts are not known at this time. No feasible mitigation measures are available at this time as the specific impacts and extent of impacts from future site-specific projects ~~is~~are unknown at this time.

## 4.13 Recreation

This section analyzes the potential for significant impacts related to recreation that could result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (LCPU) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC Land Development Code, and associated discretionary actions.

### 4.13.1 Existing Conditions

#### 4.13.1.1 Parks and Recreational Facilities

##### a. Blueprint SD Initiative

The City has over 42,000 acres of developed and undeveloped park land, joint use, and open space lands that offer a diverse range of recreational opportunities (City of San Diego 2021). The City’s parks and recreational facilities annually serve millions of community members and visitors and play an important role in the physical, mental, social, and environmental health of community members and visitors. The parks and recreation system includes, but is not limited to, developed regional parks, resource-based regional parks, open space, major parks, community parks, neighborhood parks, mini-parks, pocket parks or plazas, recreation centers, and joint use parks, as well as various urban and open space trails (see Table 3 of the City’s Parks Master Plan [PMP] for the parks and recreation facility typologies within the City). The number and type of parks and recreational facilities varies between communities in the City. The City has three categories of parks and recreational facilities for community members and visitors: population-based parks, resource-based parks, and open space. They are defined as follows:

- Population-based parks (commonly known as Neighborhood and Community parks), facilities, and services are located in close proximity to residential development and are intended to serve the daily needs of the neighborhood and community. When possible, parks can adjoin schools to share facilities, and ideally are within walking/rolling distance of the residences within their service area. These parks are developed based on population changes.

- Resource-based parks are located at, or centered on, notable natural or man-made features (beaches, canyons, habitat systems, lakes, historic sites, and cultural facilities) and are intended to serve the citywide population, as well as visitors.
- Open space lands are City-owned lands located throughout the City consisting of canyons, mesas, and other natural landforms. This open spaces is intended to preserve and protect native plants and animals, while providing public access and enjoyment by the use of hiking, biking, and equestrian trails.

## b. Hillcrest Focused Plan Amendment

There are 15 existing parks and recreational facilities in the Uptown Community Planning area. Parks and recreational facilities within the Hillcrest FPA area include Florence Elementary School Joint Use Facility and Hospice Point Open Space in the northern portion of the Hillcrest FPA area.

With the transition to the Recreational Value-Based Park standard, as part of the proposed Hillcrest FPA, each park within the Uptown Community Planning area was evaluated using the Recreational Value-Based Park standard and compared to the citywide standard of 100 points per 1,000 residents (Table 4.13-1). Based on a ~~2021-2022~~ population of ~~50,593~~39,400 people, 3,940 recreation value points are needed to serve the current population. ~~The total recreation value points for existing parks in the Uptown Community Planning area is 978, with 2,241~~3,315 planned recreational value points; ~~however, 5,059 value points are required to currently meet the City minimum. This results in a total of 4,293 current and planned recreation value points.~~ The projected 2050 population of approximately 109,800 at project plan buildout requires 10,980 recreation value points. At full community development, the projected population warrants approximately ~~4.44~~3.9 recreation centers equivalent to around ~~75,789~~74,630 total square feet, and approximately ~~2.6~~2 aquatic complexes. Within the Hillcrest FPA area, additional planned recreational facilities would total approximately 3,315 recreation value points. Within the Hillcrest FPA area, one new pocket park is planned at Ninth Avenue and University Avenue (see Figure 3-15 of this PEIR), totaling approximately 2,421 recreation value points. Therefore, there is a gap of 7,581 recreation value points (City of San Diego 2024a) for the projected community buildout. As development occurs over the life of the Uptown Community Plan and the population increases, the City will pursue opportunities to provide new parks and recreation facilities consistent with the Parks Master Plan.

Table 4.13-1 Hillcrest FPA Existing and Planned Parks and Recreation Facilities Community Summary	
Statistics – 2021-2022 Population	
Total Population	50,593,400
Recreation Value Points Goal, 100 points per thousand	5,059,340
Current Recreation Value Points	978
2050 Population, Planned Facilities Built	
Projected 2050 Population	109,800
Recreation Value Points Goal, 100 points per thousand	10,980
Current Recreation Value Points	978
Planned Additional Recreation Value Points	2,421,315
Current + Planned Recreation Value Points Total	3,399,293
Future Park and Public Space Opportunities	6,687

### c. University Community Plan Update

There are 17 parks in the University CPU area, made up of population-based parks, joint use parks, and resource-based parks. There are two recreation centers, three community parks, five neighborhood parks, and three mini parks located in the University CPU area. The City has four joint use agreements with several schools in the University CPU area, including Doyle Elementary School, Spreckels Elementary School, Curie Elementary School, and Standley Middle School for use of school parks. The University CPU area also contains over 1,700 acres of resource-based parks.

Most natural open space in the University CPU area is concentrated in the Torrey Pines State Natural Reserve in the northwest portion of the University CPU area, alongside the Pacific Ocean. Torrey Pines City Park includes a bluff top and beach (Black's Beach) west of the Torrey Pines Golf Course. Rose Canyon, an open space canyon, includes hiking trails which run through natural chaparral and oak woodland habitats.

With the transition to the Recreational Value-Based Park standard, as part of the University CPU, each park within the University CPU area was evaluated using the Recreational Value-Based Park standard and compared to the citywide standard of 100 points per 1,000 residents (see Table 4.13--2). Based on the 2020 population of ~~60,950,642~~ 60,956,421 people, ~~6,095,642~~ 6,095,642 recreational value points are required to ~~meet the City minimum~~ serve the current population. The ~~total current~~ total current recreation value points for existing parks in the University community is 3,600, with 5,319 planned recreational value points. This results in a total of 8,919 current and planned recreation value points. By ~~The projected 2050, the projected population of in the University CPU area is estimated to be approximately 144,212,566 people at plan buildout, which results in a need for 14,421 requires 12,957 recreation value points to meet the City's Recreational Value-Based Park standards. Therefore, there is a recreational value point gap of 5,592 for the projected community buildout. To meet the City's PMP standard for a minimum of 17,000 square feet per recreation center or 25,000 population, the University CPU's projected population results in the need for approximately 98,000 88,100 square feet of recreation center building space. The need is equivalent to 5.27 recreation centers sized at 17,000 square feet each. To meet the PMP's standards for aquatic complexes, the~~



University CPU's projected population results in the need for approximately 2.86 aquatic complexes (City of San Diego 2024b). As development occurs over the life of the University Community Plan and the population increases, the City will pursue opportunities to provide new parks and recreation facilities consistent with the Parks Master Plan.

<b>Table 4.13-2 University CPU Existing and Planned Parks and Recreation Facilities Community Summary</b>	
Statistics – 2020 population	
Total Population	<del>60,950</del> <u>64,206</u>
Recreation Value Points Goal, 100 per thousand	<del>6,095</del> <u>6,421</u>
Current Recreation Value Points	3,600
2050 Population, Planned Facilities Built	
Projected 2050 Population	<del>144,212</del> <u>129,566</u>
Recreation Value Points Goal, 100 per thousand	<del>14,421</del> <u>12,957</u>
Current Recreation Value Points	3,600
Planned Additional Recreation Value Points	<del>5,229</del> <u>5,319</u>
Current + Planned Recreation Value Points	<del>8,829</del> <u>8,919</u>
Future Parks and Public Space Opportunities	<u>4,038</u>

## 4.13.2 Regulatory Setting

### 4.13.2.1 State Regulations

#### a. California Public Park Preservation Act of 1971

The California Public Park Preservation Act (California Public Resources Code Sections 5400 et seq.) is the primary instrument for protecting and preserving parkland and includes provisions that ensure no net loss of parkland and facilities. Public Resources Code Section 5401 states that no city, city and county, county, public district, or agency of the state, including any division, department, or agency of the state government, or public utility, shall acquire (by purchase, exchange, condemnation, or otherwise) any real property, which property is in use as a public park at the time of such acquisition, for the purpose of utilizing such property for any nonpark purpose, unless the acquiring entity pays or transfers to the legislative body of the entity operating the park sufficient compensation or land, or both, as required by the provisions of this chapter to enable the operating entity to replace the park land and the facilities thereon.

### 4.13.2.2 Local Regulations

#### a. City of San Diego General Plan

Multiple elements of City's General Plan address recreation. Applicable General Plan policies, including new and/or updated policy language applicable to recreation are discussed below.

The **Public Facilities, Services, and Safety Element** of the General Plan includes policies on the prioritization and provision of park and recreation facilities. Relevant standards and policies related to parks and recreation include, but are not limited to the following:

- **Policy PF-A.2:** Plan for public space such as libraries, public markets, and parks that will be attractive to families with children.
- **Policy PF- B.4b:** Require development proposals to fully address impacts to public facilities and services. Projects should identify specific improvements and financing which would be provided by the project, including but not limited to sewer, water, storm drain, solid waste, fire, police, libraries, parks, open space, and transportation projects.

The **Recreation Element** of the General Plan includes policies which encourage the acquisition, development, operation/maintenance, increase, and enhancement of public recreational opportunities and facilities throughout the City. Policies include, but are not limited to the following:

- **Policy RE-A.8:** Fully implement and achieve the park standards identified in the PMP, including land acquisition.
- **Policy RE-A.9:** Identify opportunities to increase recreational value and population-based parks within the community consistent with the PMP by planning for upgrades and new investments within existing parks. Allow for flexibility and innovation to provide parks and recreational opportunities.
- **Policy RE-A.10:** Encourage private development to include recreation facilities, such as children's play areas, rooftop parks and courts, useable public plazas, and mini-parks.

## b. City of San Diego Parks Master Plan

Adopted August 2021, the PMP identifies policies, actions, and partnerships for planning parks, recreation facilities, and programs that create a citywide network of recreational experiences. The PMP identifies existing gaps to guide future park development and promotes equity throughout the City. It establishes new equity goals, new 10-20-30-40-minute access goals, new park standards for new development that measure recreational value, and citywide Park Development Impact Fees (DIFs). New park standards would apply to new development and were created specifically to address park access issues in densely populated areas.

The PMP establishes a new park standard, the Recreational Value-Based Park Standard (Value Standard). This differs from the previous population-based standard. The Value Standard applies to population-based parks and portions of regional parks which serve local populations. The Value Standard is not intended to be applied to portions of regional parks which serve the region, including trails, shorelines, and open space parks. Regional assets are to be evaluated during future CPUs community plan updates. The Value Standard determines the value of parks in points based on features related to park size, recreational opportunities, access, amenities, activations, and overall value delivered. As an outcome-based measure, the standard recognizes the value of parks appropriate for diverse communities, from ball fields to pocket parks to trails.

The Value Standard is based on four communities that met the previous acreage standard of 2.8 acres per 1,000 residents in 2020. The score was based on recreational amenities, yielding a recreation value of 100 points per 1,000 people that is now applied citywide.

The PMP provides the vision for providing parks and recreational opportunities to residents of the City. It outlines the standard for providing population-based parks, known as the Recreational Value-Based Park Standard, which establishes a point value to represent recreational opportunities within population-based parks to assess the need for upgrades and new park facilities. The PMP serves as a policy framework to guide future park development efforts.

### c. City of San Diego Municipal Code

The City maintains Public Facility Regulations which establish when public facilities would be required to be provided by private development (Chapter 14, Article 2, Division 6). The intent of these regulations is to assure that the cost of providing public facilities to serve new development is the responsibility of that development and that minimum standards for public facilities are maintained to protect the public health, safety, and welfare. San Diego Municipal Code (SDMC) Section 142.0640 implements the City's General Plan policies related to the maintenance of an effective facilities financing program to ensure the impact of new development is mitigated through appropriate fees. As required by the SDMC, individual development projects may satisfy park requirements either through providing public parks consistent with SDMC Section 142.0640(b)(98)(A--F) or by paying the citywide park DIFs. Development that designs and constructs an on-site park that satisfies the development's park standard identified in the PMP, shall not be subject to the requirement to pay the citywide park DIF, ~~given where~~ the requirements set forth in San Diego Resolution R-313688 have been satisfied. In order for park improvements constructed on-site to receive population-based park credit, they must meet the requirements listed in SDMC Section 142.0640(b)(89)(A-F) as follows:

- A. The park shall be designed and constructed in accordance with the General Development Plan approved in accordance with Council Policy 600-33 COMMUNITY NOTIFICATION AND INPUT FOR CITY-WIDE PARK DEVELOPMENT PROJECTS, which requires community input, recommendation for approval from the Community Recreation Group and final approval by the City of San Diego Park & Recreation Board.
- B. The park shall be designed and constructed in accordance with the City's Park Development Standard Terms and Conditions and the Consultant's Guide to Park Design and Development to the satisfaction of the Parks and Recreation Director.
- C. The park shall be publicly accessible in perpetuity with a Recreation Easement recorded over all park improvements.
- D. A maintenance agreement to maintain the park shall be recorded.
- E. A performance bond and payment bond shall be provided for the design and construction of the park improvements.
- F. A fee in the amount of 10 percent of the total DIF related to parks that would have otherwise been required shall be paid to fund park and recreation improvements in the City.

### 4.13.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to recreation are based on applicable criteria in the California Environmental Quality Act Guidelines Appendix G and the City's California Environmental Quality Act Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?
- 2) Would the project include recreational facilities or require the construction or expansion of recreational facilities which would have an adverse physical effect on the environment?

### 4.13.4 Impact Analysis

#### Issue 1 Deterioration of Parks and Recreational Facilities

*Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

##### a. Blueprint SD Initiative

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative Climate Smart Village Areas. ~~Although the Blueprint SD Initiative's~~ policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas.

The City has over 42,000 acres of developed and undeveloped park land, joint use, and open space lands that offer a diverse range of recreational opportunities. The Blueprint SD Initiative would support increases in development intensities citywide, especially within the Climate Smart Village Areas, and the growth associated with these future developments could, over time, result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. As future CPUs, Specific Plans, and FPAs are implemented, the projected recreation value points of these plans would be calculated based on the buildout population estimates which would help determine if there is an existing deficit of additional parks and recreational facilities are needed to serve the population within these plan areas. These future CPUs, Specific Plans, and FPAs would be reviewed for consistency with the policies in the General Plan and the PMP that encourage the development of new and the enhancement of existing park facilities, and could also identify future

parcs and recreational opportunities and propose regulations and policies which would address ~~any existing deficiencies~~ community needs and support the development of parks and recreational facilities within these plan areas. Nevertheless, at a program level of review, it cannot be determined to what extent future parks and recreational facilities would be able to accommodate increased demand and offset the potential increased use of existing parks and recreational facilities and their associated physical deterioration that could occur with implementation of the Blueprint SD Initiative. As future development is proposed, individual private developments would be required to either pay citywide park DIFs or provide public parks consistent with SDMC Section 142.0640(b)(98)(A-F), as detailed in Section 4.13.2.2c. However, despite application of the City's regulatory framework that requires individual developments to support funding for or construction of public park facilities, the additional growth that could occur within the City in accordance with the Blueprint SD Initiative could increase the use and deterioration of existing recreational facilities; therefore, impacts would be potentially significant.

## **b. Hillcrest Focused Plan Amendment**

Buildout of the Hillcrest FPA would increase the capacity for multi-family residential units and non-residential development in the Hillcrest FPA area, and the growth associated with these future developments could result in an increase in the use of existing neighborhood and regional parks or other recreational facilities within the Hillcrest FPA area, potentially resulting in the physical deterioration of these facilities.

The Hillcrest FPA ~~identifies a new pocket park at Ninth Avenue and University Avenue (see Figure 3-15 of this PEIR) and~~ includes a regulatory and policy framework which would support the development of parks and recreational facilities in the Hillcrest FPA area. The Hillcrest FPA proposes a Community Plan Implementation Overlay Zone (CPIOZ) Type A over the Hillcrest District (see Figure 3-17 of this PEIR) which provides Supplemental Development Regulations (SDRs) which identify when a development is required to provide a public space, a promenade, or a lesbian, gay, bisexual, transgender, queer (LGBTQ+) Interpretive Trail Paving (SDR-B.1 through SDR-B.4). These SDRs would support increased public spaces within the Hillcrest FPA area and would ensure that park space is considered as part of new development projects. The Hillcrest FPA also updates the parks and recreation policy framework in the Uptown Community Plan to reflect the PMP and includes policies which support the expansion of recreational opportunities within the community including, but not limited to, RE-1.12, which encourages the development of parks within residential mixed-use developments and other public facilities; RE-1.18, which calls on the City to explore securing parks/recreation opportunities within development along and near Promenades and the LGBTQ+ Walking Corridors; and RE-1.19, which encourages new recreational opportunities in spaces that are privately owned and are open to the public.

~~Although~~ The Hillcrest FPA identifies future parks and recreational opportunities within the Hillcrest FPA area and includes SDRs to support the provision of public spaces, ~~the projected deficit in population-based parks and recreation facilities and the gap of 7,5816,687 recreation value points would remain upon implementation of the Hillcrest FPA.~~ The development of future parks and recreational facilities within the Hillcrest FPA area that could occur in accordance with the Hillcrest FPA ~~could decrease this deficit and~~ could offset the potential increased use of existing parks and recreational facilities and their associated physical deterioration; however, it is unknown to what the

extent these potential future facilities would be able to accommodate increases in demand for parks and recreational facilities as the population grows. As future development is proposed, individual private developments would be required to either pay citywide park DIFs or provide public parks consistent with SDMC Section 142.0640(b)(98)(A-F), as detailed in Section 4.13.2.2c. However, despite application of the City's regulatory framework that requires individual developments to support funding for or construction of public park facilities, the additional growth that could occur within the Hillcrest FPA area could increase the use and deterioration of recreational facilities; thus, impacts would be potentially significant.

### c. University Community Plan Update

Buildout of the University CPU would increase the capacity for multi-family residential units and non-residential development in the University CPU area. The growth associated with these future developments could result in an increase in the use of existing neighborhood and regional parks or other recreational facilities, potentially resulting in the physical deterioration of these facilities.

The University CPU identifies new parks and recreational facilities at Regents Road North and South, Governor Drive, Nobel Drive, ~~Towne Center Drive, Campus Point Drive,~~ Executive Drive, and adjacent to Torrey Pines City Park, ~~as well as potential trail facilities within the open space areas of the community~~ (see Figures 26 and 27 of the University CPU). The University CPU also includes a regulatory and policy framework which would facilitate the development of parks and recreational facilities in the CPU area. Future development within the University CPU's CPIOZ-Type A boundary would be required to comply with SDR-A.1, which requires new development to provide public spaces and associated amenities, and SDR-A.3, which requires development fronting the north side of Executive Drive from Regents Road to Judicial Drive to provide a promenade along Executive Drive. Policies within the University CPU which support the development of parks and recreational facilities include, but are not limited to, policy 4.1B, which calls for pursuing opportunities to provide public spaces and gathering spots by reconfiguring public right-of-way areas and through SDRs; policy 4.1C, which calls for establishing an integrated public realm framework of connected sidewalks, urban pathways, trails, paseos, plazas, connections at multimodal mobility hubs, and parks like linear and pocket parks; and policy 4.1F, which encourages the preservation, expansion, and enhancement of existing recreation centers and aquatic facilities to increase their life span, meet current and future recreational needs, or expand their uses and sustainability.

~~Although~~ The University CPU identifies potential future parks and recreational opportunities in the University CPU area and includes SDRs to support the provision of public spaces, ~~the projected deficit in population-based parks and recreation facilities and the gap of 5,592 recreation value points would remain upon implementation of the University CPU~~. The development of future parks and recreational facilities within the University CPU area that could occur in accordance with the University CPU ~~could decrease this deficit and~~ could offset the potential increased use of existing parks and recreational facilities and their associated deterioration; however, it is unknown to what extent these potential future facilities would be able to accommodate increases in demand for parks and recreational facilities as the population grows. As future development is proposed, individual private developments would be required to either pay citywide park DIFs or provide public parks consistent with SDMC Section 142.0640(b)(98)(A-F), as detailed in Section 4.13.2.2c. However, despite application of the City's regulatory framework that requires individual developments to support



funding for or construction of public park facilities, the additional growth that could occur within the University CPU area could increase the use and deterioration of existing recreational facilities; thus, impacts would be potentially significant.

## Issue 2 Construction or Expansion of Recreational Facilities

*Would the project include recreational facilities or require the construction or expansion of recreational facilities which would have an adverse physical effect on the environment?*

### a. Blueprint SD Initiative

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map. This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future increases in development intensities that support higher density residential and mixed-use development within the Blueprint SD Initiative Climate Smart Village Areas. ~~Although the Blueprint SD Initiative's policy and land use framework would apply citywide~~ and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas.

The City is served by a variety of parks, athletic fields, aquatics facilities, recreation centers, neighborhood parks, joint-use parks, trails, and open space areas. The Blueprint SD Initiative does not propose the development of any specific parks or recreational facilities; however, the Blueprint SD Initiative would support increases in development intensities citywide, especially within the Climate Smart Village Areas, and the growth associated with these future developments could require the construction or expansion of recreational facilities to accommodate any increased need for parks and recreational facilities.

Opportunities for additional park land and recreational facilities within the City are anticipated to come primarily through redevelopment of private and public properties. While it is a goal of the City ~~is to obtain land for parks and recreational facilities~~ and potential park sites have been identified in the PMP, vacant land is limited, unavailable, or cost-prohibitive, and the General Plan encourages the development of both traditional parks and flexible public spaces that meet a community's needs, such as linear parks, public plazas, and other park typologies (City of San Diego 2024c).

The performance standards for park space in the City are outlined in the City's PMP (City of San Diego 2021). The PMP establishes a Recreational Value-Based Park Standard (Value Standard) as the guideline for providing adequate park space. The Value Standard requires 100 Recreation Value-Based points per 1,000 residents. As future CPUs, Specific Plans, and FPAs are implemented, the projected recreation value points of these plans would be calculated based on the buildout population estimates which would help determine if ~~there is an existing deficit of~~ additional parks and recreational facilities are needed to serve the population within these plan areas. These future CPUs, Specific Plans, and FPAs would be reviewed for consistency with policies in the General Plan and the PMP that encourage the development of new and the enhancement of existing park

facilities, and could also identify future parks and recreational opportunities and propose regulations and policies which would address ~~any existing deficiencies~~ community needs and support the development of parks and recreational facilities within these plan areas. The future development of parks and recreational amenities in the project area could cause physical environmental impacts including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future parks and recreational facilities are proposed for development, a project specific environmental review would be required and compliance with regulations in existence at that time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these parks and recreational facilities. However, as the location and need for potential future parks and recreational facilities cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to a less than significant level, impacts would be potentially significant.

## **b. Hillcrest Focused Plan Amendment**

The current recreation value points for the Uptown Community Planning area ~~are~~ is 978, with an additional 3,315 planned recreation value points. Based on current population estimates for 2050 at full -and-buildout of the Hillcrest FPA, an additional -would result in a need for 10,980-6,687 recreation value points would be needed to meet the City's Recreational Value-Based Park standards. ~~The Hillcrest FPA identifies a new pocket park at Ninth Avenue and University Avenue and includes a robust regulatory and policy framework which would facilitate the development of parks and recreational facilities in the Hillcrest FPA area.~~ Future development within the CPIOZ-Type A Hillcrest District would be required to comply with SDR-B.1 through SDR-B.4, which require the provision of a public space, promenade, or an LGBTQ+ Interpretive Trail improvement. Additionally, policies within the Uptown Community Plan which support the provision of parks and recreational facilities include, but are not limited to, policy RE-1.17, which calls on the City to explore the opportunity to site a recreation center in the ground floor of a future residential or mixed-use project; policy RE-1.18, which calls for securing park/recreation opportunities within development along and near promenades and the LGBTQ+ Cultural Walking Corridors; and policy RE-1.19, which encourages the exploration of new recreational opportunities in spaces that are privately owned and are open to the public.

The Hillcrest FPA does not propose specific parks or recreational facility projects at this time; however future development that occurs in accordance with the Hillcrest FPA could result in the construction or expansion of parks and recreational facilities within the community. As future development occurs in the Hillcrest FPA area, parks and recreational amenities may be required as part of the development, as publicly accessible open spaces, or public parkland. The construction and operation of new and/or expanded parks and recreational facilities could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future parks and recreational facilities are proposed for development, a project-specific environmental review would be required and compliance with regulations in existence at that time as well as any additional project-specific mitigation measures would reduce potential environmental

impacts related to the construction and operation of these parks and recreational facilities. However, as the location of potential future parks and recreational facilities cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to a less than significant level, impacts would be potentially significant.

### c. University Community Plan Update

The current recreation value points for the University CPU area ~~are~~ 3,600 with an additional 5,319 planned recreation value points. Based on current population estimates for 2050 at full and buildout of the University CPU, an additional 4,038 would result in a need for 14,421,957 recreation value points would be needed to meet the City's Recreational Value-Based Park standards. ~~To address this deficit, the University CPU identifies new parks at Regents Road North and South and at Governor Drive, a new pocket parks at Nobel Drive, Torreyana, and Campus Point Drive, a promenade along Executive Drive, and a new neighborhood park adjacent to Torrey Pines City Park (see Figure 26 of the University CPU). Potential trail facilities are also identified in the open space areas of the community as shown on Figure 27 of the University CPU.~~

The University CPU also includes a regulatory and policy framework which would facilitate the development of parks and recreational facilities in the University CPU area. Future development within the University CPU's CPIOZ-Type A boundary would be required to comply with SDR-A.1, which requires new development to provide public spaces and associated amenities, and SDR-A.3, which requires development fronting the north side of Executive Drive from Regents Road to Judicial Drive to provide a promenade along Executive Drive. Policies within the University CPU which support the development of parks and recreational facilities include, but are not limited to, policy 4.1B, which calls for pursuing opportunities to provide public spaces and gathering spots by reconfiguring public right-of-way areas and through SDRs; policy 4.1C, which calls for establishing an integrated public realm framework of connected sidewalks, urban pathways, trails, paseos, plazas, connections at multimodal mobility hubs, and parks like linear and pocket parks; and policy 4.1F, which encourages the preservation, expansion, and enhancement of existing recreation centers and aquatic facilities to increase their life span, meet current and future recreational needs, or expand their uses and sustainability.

The University CPU does not propose specific parks or recreational facility projects at this time; however, future development that occurs in accordance with the University CPU could result in the construction and/or expansion of parks and recreational facilities within the community. The construction and operation of new and/or expanded parks and recreational facilities could result in environmental impacts, including but not limited to, disturbances or conversion of habitat, water pollution during construction, increased noise levels, and an increase in impermeable surfaces. At the time future parks and recreational facility projects are proposed, they would require a separate environmental review and compliance with regulations in existence at that time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these parks and recreational facilities. However, as the location of potential future parks and recreational facilities cannot be determined at this time, it is unknown what specific impacts may occur and the extent of these impacts. Thus, as it cannot be

ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to a less than significant level, impacts would be potentially significant.

## Cumulative Impacts

~~Parks and recreation facility deficiencies exist in various areas throughout the City. Development that could occur in accordance with the Blueprint SD Initiative, Hillcrest FPA, and University CPU could increase the use of existing recreational facilities, which could require the need for new or expanded recreational facilities to serve additional population. The development of future parks and recreational facilities within the project area could offset the potential increased use of existing parks and recreational facilities and their associated physical deterioration; however, it is unknown to what the extent these potential future facilities would be able to accommodate increases in demand for parks and recreational facilities. Incremental impacts associated with the increased use of existing neighborhood and regional parks or other recreational facilities are anticipated to be cumulatively considerable. Thus, cumulative impacts related to parks and recreational facilities would be significant.~~

The regulatory and policy framework within the Blueprint SD Initiative, Hillcrest FPA, and University CPU would support and facilitate the construction and operation of new and/or expanded parks and recreational facilities. Additionally, the City's Build Better SD Initiative, which created a citywide infrastructure funding program to streamline public investments to efficiently prioritize and address the infrastructure ~~gaps-needs~~ throughout the City, would help facilitate the construction of needed parks and recreational facilities ~~and would result in broader infrastructure improvements that would reduce cumulative impacts to parks and recreational facilities in the City.~~ Investments will be prioritized in areas with the greatest needs and greatest growth in line with the General Plan's Recreation Element, and Build Better SD, as well as City Council Policies 800-14 and 000-32. Future parks and recreational facilities projects would require a separate project-level environmental review and compliance with regulations in existence at the time as well as any additional project-specific mitigation measures would reduce potential environmental impacts related to the construction and operation of these parks and recreational facilities. Nonetheless, future project--specific impacts, as well as the extent of these impacts cannot be determined at this time; thus, impacts related to the construction and operation of recreational facilities would remain significant ~~and unavoidable~~. Incremental impacts associated with the construction and operation of these future parks and recreational facilities are anticipated to be cumulatively considerable. Thus, cumulative impacts related to parks and recreational facilities would be significant.

## 4.13.5 Significance of Impacts

### 4.13.5.1 Deterioration of Parks and Recreational Facilities

#### a. Blueprint SD Initiative

Implementation of the Blueprint SD Initiative could result in an increase in the use of existing neighborhood and regional parks and other recreational facilities, which could result in the

deterioration of these facilities. The Blueprint SD Initiative includes a policy framework which supports the maintenance and provision of new recreational facilities. Additionally, future CPUs, Specific Plans, and FPAs that are implemented in accordance with the Blueprint SD Initiative could identify potential recreational opportunities and provide regulations and policies which support and facilitate the development of recreational facilities. While the development of future recreational amenities under the project could offset the potential increased use of existing recreational facilities, it is unknown where these future improvements would be located, the specific impacts and the extent of impacts that could result from providing these facilities, and to what extent these future facilities would be able to accommodate increases in demand for recreational facilities. Thus, as it cannot be ensured that all future impacts would be mitigated to a less than significant level, impacts would be significant.

### **b. Hillcrest Focused Plan Amendment**

Implementation of the Hillcrest FPA could result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. While the development of the planned pocket park, as well as future recreational amenities supported by the project could offset the potential increased use of existing recreational facilities, it is unknown where these future improvements would be located, the specific impacts and the extent of impacts that could result from providing these facilities, and to what extent these future facilities would be able to accommodate increases in demand for recreational facilities. Thus, as it cannot be ensured that all impacts would be mitigated to a less than significant level, impacts would be significant.

### **c. University Community Plan Update**

Implementation of the University CPU could result in an increase in the use of existing neighborhood and regional parks or other recreational facilities. While the development of the recreational facilities identified by the University CPU could offset the potential increased use of existing recreational facilities, it is unknown where these future improvements would be located, what specific impacts and the extent of impacts could result from providing these facilities, and to what extent these future facilities would be able to accommodate increases in demand for recreational facilities. Thus, as it cannot be ensured that all impacts would be mitigated to a less than significant level, impacts would be significant.

## **4.13.5.2 Construction or Expansion of Recreational Facilities**

### **a. Blueprint SD Initiative**

Implementation of the Blueprint SD Initiative could require the construction and/or expansion of parks and recreational facilities. While compliance with the regulations in existence at that time as well as any additional project-specific mitigation measures would address potential environmental impacts related to the construction and operation of future recreational facilities, it is unknown where specific future developments would be located and what the specific environmental impacts and extent of impacts may be associated with providing these facilities. As it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to less than significant, impacts would be significant.

## **b. Hillcrest Focused Plan Amendment**

Implementation of the Hillcrest FPA could require the construction and/or expansion of parks and recreational facilities in the Hillcrest FPA area. While compliance with the regulations in existence at that time projects are proposed as well as any additional project-specific mitigation measures would address potential environmental impacts related to the construction and operation of future recreational facilities, it is unknown where specific future developments would be located and what the specific environmental impacts and extent of impacts may be associated with providing these facilities. As it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to less than significant, impacts would be significant.

## **c. University Community Plan Update**

Implementation of the University CPU could require the construction and/or expansion of parks and recreational facilities in the University CPU area. While compliance with the regulations in existence at that time as well as any additional project-specific mitigation measures would address potential environmental impacts related to the construction and operation of future recreational facilities, it is unknown where specific future developments would be located and what the specific environmental impacts and extent of impacts may be associated with providing these facilities. As it cannot be ensured that all impacts associated with the construction and operation of potential future parks and recreational facilities would be mitigated to less than significant, impacts would be significant.

## **4.13.6 Mitigation Monitoring and Reporting**

### **4.13.6.1 Deterioration of Parks and Recreational Facilities**

No feasible mitigation measures beyond required regulatory compliance with the PMP and SDMC Section 142.0640(b) are available at this time.

### **4.13.6.2 Construction and Expansion Recreational Facilities**

Implementation of the project could result in the need for new and/or altered recreational facilities. The construction and operation of new and/or altered recreational facilities would be required to comply with the City's existing regulations, including but not limited to, the City's Environmentally Sensitive Lands Regulations and Historical Resources Regulations, and the mitigation measures identified in this PEIR (see Chapter 9.0) as well as any additional project-specific mitigation measures at the time future projects are proposed. While compliance with the existing regulations as well as any additional project-specific mitigation measures at the time future projects are proposed would serve to reduce potential environmental impacts associated with the development of new and/or altered recreational facilities, impacts would remain significant as the specific impacts and extent of these impacts are not known at this time. No feasible mitigation measures are available at this time as the specific impacts and extent of impacts from future site-specific projects are unknown at this time.



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## 4.13.7 Significance after Mitigation

### 4.13.7.1 Deterioration of Parks and Recreational Facilities

Future individual private developments would be required to either pay citywide park DIFs or provide public parks consistent with SDMC Section 142.0640(b)(98)(A-F), as detailed in Section 4.13.2.2c, and development of future park and recreational facilities within the project area could offset the potential increased use of existing recreational facilities and their associated physical deterioration. However, it is unknown to what extent potential future parks and recreational facilities would be able to accommodate increases in demand for recreation facilities. Thus, after application of the City's regulatory framework that supports park improvements, it cannot be ensured that impacts associated with the deterioration of neighborhood parks and recreational facilities would be mitigated to less than significant; therefore, impacts would remain significant.

### 4.13.7.2 Construction and Expansion Recreational Facilities

While compliance with the existing regulations and future project-specific the mitigation measures ~~detailed in Chapter 9.0 of this PEIR~~ would serve to reduce potential environmental impacts, impacts associated with the construction and operation of future parks and recreational facilities would remain significant as the specific impacts and extent of the impacts and ability of the regulatory and mitigation framework to fully reduce impacts associated with the construction and operation of future recreation facilities are not known at this time.

## 4.14 Transportation

This section analyzes the potential for significant impacts related to transportation that could result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update ~~(CPU)~~ (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

This section describes the existing transportation system within the project areas, characteristics of the project areas, as well as relevant federal, state, and local regulations and programs related to transportation.

### 4.14.1 Existing Conditions

#### 4.14.1.1 Physical Setting

The City provides transportation to the public using numerous modes of transportation including a network of highways and roads, public transit, local streets, paths, and trails. The transportation system provides travel for residents, visitors, employees, and goods movement and is comprised of a system that supports City and regional economic needs.

#### a. Blueprint SD Initiative

The Blueprint SD Initiative proposes an updated policy and land use framework defined by the Village Climate Goal Propensity Map (see Figure 3-1). This map would guide the development of future CPUs, Specific Plans, and FPAs, which would primarily focus future land use changes within the Climate Smart Village Areas, which are areas within the City with a medium to high village propensity value (i.e., 7 through 14) where the City would support the redesignation of land uses to increase development capacity, supporting more homes and jobs. Future increases in development intensities that support higher density residential and mixed-use development are anticipated to be focused in these Climate Smart Village Areas as these areas have good access to homes, jobs, and mixed-use destinations; are in proximity to high-frequency transit services based on the proposed 2050 regional transportation network, have competitive transit access to job centers based on the 2050 regional transportation network, and provide good connections between transit and destinations. Although the Blueprint SD Initiatives’ policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, it is

anticipated that potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas.

### **b. Hillcrest Focused Plan Amendment**

The Hillcrest FPA would increase the allowable development intensity and residential density within approximately 380 acres of the Hillcrest and Medical Complex neighborhoods allowing for additional homes and jobs to be near transit (see Tables 3-1 and 3-2 of this Program Environmental Impact Report [PEIR]). Generally, higher intensity development would be allowed along primary transit corridors, increasing opportunities for mixed-use commercial and employment districts. The proposed revised Uptown Community Plan Land Use map is depicted on Figures 3-8a through c. The proposed revised Uptown Community Plan mobility networks are depicted on Figures 3-10 through 3-13.

### **c. University Community Plan Update**

- a) The University CPU area includes approximately 8,675 acres (approximately 13.5 square miles). Streets and freeways comprise the mobility framework of the University CPU area's transportation system. The University CPU area is relatively well-served by transit, with most of the community within a half-mile of a major transit stop, which defines the boundary for being located within a Transit Priority Area (TPA). ~~or The University CPU area also includes Sustainable Development Areas (SDAs; see Section 4.10.2.2.f)(SDA; see section 4.10.2.2.f).~~

The proposed University CPU mobility networks are depicted on Figures 3-20 through 3-24.

## **4.14.1.2 Roadway Classifications**

All community planning areas are in proximity to freeways and major roadways. Roadway facilities are categorized into the following street classifications and functions.

### **a. Freeway**

A freeway is designed to carry through traffic, and is fully access controlled by grade separations, interchanges, and ramp connections. It normally is maintained by the California Department of Transportation (Caltrans), is constructed to state criteria, and varies in width from four to eight or more lanes. Freeways that serve the City and the Blueprint SD Initiative's Climate Smart Village Areas include Interstate (I) 5, I-805, I-15, and State Route (SR) 905, SR-54, SR-94, SR-163, SR-15, SR-52, and SR-56. The University CPU area is served by three freeways: I-5, I-805, and SR-52. The Hillcrest FPA area is bisected and served by SR-163.

### **b. Primary Arterial**

A primary arterial primarily provides a network connecting vehicles and transit to other primary arterials and to the freeway system. It carries heavy vehicular movement while providing low pedestrian movement and moderate bicycle and transit movements. It generally has a raised center

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median, bicycle lanes, street trees, traffic safety street lighting, sidewalks, and no access from abutting property. It may include underground utilities.

### **c. Major Street**

A major street primarily provides a network connecting vehicles and transit to collector and local streets, other major streets and primary arterials, and to the freeway system. It also provides access to abutting commercial and industrial property. It generally carries moderate-to-heavy vehicular movement, low-to-high pedestrian and bicycle movements, and moderate-to-high transit movement. It generally has a raised center median, street trees, traffic safety street lighting, and sidewalks, and may include landscaping, pedestrian-scale lighting, underground utilities, on street parking, and/or bike lanes.

### **d. Collector Street**

A collector street primarily provides movement between local/collector streets and streets of higher classification and, secondarily, provides access to abutting property. It generally carries low- to moderate-vehicular movement, low- to heavy-pedestrian movement, moderate- to heavy bicycle movement, and low- to moderate-transit movement. It generally has on-street parking, street trees, traffic safety street lighting, and sidewalks. It may also include landscaping, pedestrian-scale lighting, and underground utilities.

### **e. Local Street**

A local street provides, primarily, direct access to abutting property. It carries low vehicular movement, low- to heavy-pedestrian movement, and low- to moderate-bicycle movement. It generally has on-street parking, street trees, traffic safety street lighting, and sidewalks. It may include landscaping, pedestrian-scale lighting, and underground utilities.

## **4.14.1.3 Public Transit**

### **a. Blueprint SD Initiative**

Public transportation services within the City and the Blueprint SD Initiative's Climate Smart Village Areas ~~is~~ are provided by the San Diego Metropolitan Transportation System (MTS) in the southern metropolitan area and the North County Transit District (NCTD) in the northern part of the county (with Coaster and bus services that tie into the City). Existing transit services include the trolley, buses, and commuter train. Transit services are provided both for trips within the City and region, and for trips between San Diego and adjacent areas.

### **b. Hillcrest Focused Plan Amendment**

Within the Hillcrest FPA area there are seven bus routes operated by MTS, including one Rapid bus route (Route 215) and two limited stop routes (Routes 10 and 120). All seven bus routes serving the Hillcrest FPA area operate at headways of fifteen minutes or less. Park Boulevard between El Cajon Boulevard and University Avenue features center-running transit only lanes which are utilized by the

Rapid Route 215. Most of the Hillcrest FPA area is within a quarter mile of a bus stop. Destinations reached by the Hillcrest-serving bus routes include Downtown, Fashion Valley, San Diego State University, East San Diego, Southeastern San Diego/Encanto, and the City of La Mesa. Several existing transit routes which run along University Avenue within Hillcrest are planned for an upgrade to Rapid bus service in the future by MTS and the San Diego Association of Governments (SANDAG).

### c. University Community Plan Update

The University CPU area is relatively well-served by transit, with most of the community within a half-mile of a transit stop. MTS provides public transportation services throughout the CPU area including trolley, bus, and commuter train. There are 14 MTS bus routes that service the University CPU area. The combination of the MTS, NCTD, and University of California, San Diego (UCSD) bus routes cover most of the community and provide connections to transfer stations and Coaster/Amtrak stations that allow users to access other bus routes, trolley lines and regional services. The bus routes that service the University CPU area include MTS Routes 30, 31, 41, 50, 150, 60, and 105; MTS SuperLoops 202/202 and 204; MTS Rapid Route 237; MTS Coaster Connection Routes 978 and 979; and NCTD Route 101.

The highest public transit ridership levels in the University CPU area are found at the Gilman Drive Transit Center (Gilman Drive/Myers Drive) and the University Towne Center (UTC) Transit Center. These stops are served by SuperLoop Routes 201 and 202, which have significant ridership in the area (City of San Diego 2018).

The University CPU area is also served by the UC San Diego Blue Line Trolley, which provides transit service to primary employment areas in University and the UCSD campus and connects the area with the rest of the trolley network, including Mission Valley, Downtown, East County, and South County. The six trolley stops within the University CPU area include 1) Nobel Drive/I-5; 2) Veterans Affairs Medical Center; 3) Pepper Canyon (at UCSD West); 4) Voigt Drive (at UCSD East); 5) Executive Drive/Genessee Avenue; and 6) Westfield UTC.

## 4.14.1.4 Bicycle and Pedestrian Facilities

### a. Blueprint SD Initiative

Bicycle facilities, as described below, and pedestrian facilities, such as sidewalks, promenades, and parkways, are located throughout the City and the Blueprint SD Initiative's Climate Smart Village Areas. There are three general classifications of bicycle facilities (City of San Diego 2018):

1. **Class I** - Bike Path (also referred to as shared-use or multi-use paths) are paved rights-of-way for exclusive use of bicyclists, pedestrians, and those using non-modernized modes of travel. They are physically separated from vehicular traffic and can be constructed in roadway right-of-way or exclusive right-of-way.
2. **Class II** - Bike Lanes are defined by pavement striping and signage used to allocate a portion of a roadway for exclusive or preferential bicycle travel. Bike lanes are one-way facilities on either side of a roadway.

3. **Class III** - Bike Routes provide shared use with motor vehicle traffic within the same travel lane and are frequently marked with sharrows. Sharrows are markings on the roadway used to indicate a shared lane environment for bicyclists and vehicles. Designated by signs, Class III bike routes provide continuity to other bike facilities or designated preferred routes through corridors with high demand.
4. **Class IV** - Cycle Track - Cycle tracks are bikeways located in roadway right-of-way but separated from vehicle lanes by physical barriers or buffers. Cycle tracks provide for one-way bicycle travel in each direction adjacent to vehicular travel lanes and are exclusively for bicycle use.

## **b. Hillcrest Focused Plan Amendment**

Class I, II, III, and IV bicycle facilities are found in the Hillcrest FPA area and span a total of approximately 4.1 miles. There is one Class I multi-use path in Hillcrest, which is a bridge overpass that connects the portions of Vermont Street separated by Washington Street and the SR-163 on-ramps. There are designated Class II bike lanes throughout Hillcrest along portions of University Avenue, Richmond Street, Cleveland Avenue, and Park Boulevard. There are sections of Class III bike routes within Hillcrest along Robinson Avenue, University Avenue, west of First Avenue, and Park Boulevard between University Avenue and Robinson Avenue. There are also Class IV cycle tracks along Fourth Avenue, Fifth Avenue, and Park Boulevard (see Figure 3-10).

Pedestrian activity is high throughout much of the Hillcrest FPA area. The highest activity during peak periods was observed within the commercial core area bounded by University Avenue, Robinson Avenue, Fourth Avenue, and Sixth Avenue. These streets have a walkable environment, with connectivity via sidewalks. There is just one multi-use path in the Hillcrest FPA area as mentioned above, which connects portions of Vermont Street separated by Washington Street and the SR-163 on-ramps.

## **c. University Community Plan Update**

Class I, II, and III bicycle facilities are found in the University CPU area. The Rose Canyon Bike Path is a Class I bicycle facility within the University CPU area. Class II bike lanes can be found on portions of North Torrey Pines Road, Genessee Avenue, Eastgate Mall, Miramar Road, Regents Road, and Governor Drive, as well as within UCSD's planning area. Class III bike routes are located along Nobel Drive and Regents Road.

Pedestrian facilities are located throughout the University CPU area, however the distances between points of interest can be long. There are pedestrian bridges at some locations that serve as important connections, but the area's pedestrian travel can be challenging with the wide street configurations. Central areas in the University CPU area along Regents Road and Genessee Avenue provide high pedestrian connectivity, although the outer areas are not well served due to freeway interchanges. Additionally, Rose Canyon, I-805, I-5, and SR-52 act as barriers for pedestrian connectivity through the community.



## **4.14.2 Regulatory Setting**

### **4.14.2.1 State Regulations**

#### **a. California Public Utilities Commission**

The California Public Utilities Commission regulates privately-owned railroad and rail transit. California Public Utilities Commission staff ensures that highway-rail and pathway-rail crossings are safely designed, constructed, and maintained. The Rail Crossings and Engineering Branch engineers investigate and evaluate requests to construct new rail crossings or modify existing crossings.

#### **b. California Department of Transportation**

Caltrans is the primary state agency responsible for the construction and maintenance of the state highway system. Caltrans has established standards for street traffic flow and has developed procedures to determine if intersections require improvements. For projects that may physically affect facilities under its administration, Caltrans requires encroachment permits before any construction work may be undertaken. In addition, Caltrans must review proposals to signalize any freeway ramp interchanges through their Intersection Control Evaluation process (Caltrans Traffic Operations Policy Directive #13-01).

#### **c. California Transportation Commission**

The California Transportation Commission (CTC) consists of nine members appointed by the Governor. The CTC is responsible for the programming and allocation of funds for the construction of highway, passenger rail, and transit improvements throughout the state. The CTC is also responsible for adopting the State Transportation Improvement Program and the State Highway Operation and Protection Program.

#### **d. California Complete Streets Act of 2008**

Supporting some of the previously referenced regulations/requirements, the California Complete Streets Act of 2008 (Assembly Bill [AB] 1358) requires circulation elements as of January 1, 2011, to accommodate the transportation system from a multi-modal perspective, including public transit and walking and biking, which have traditionally been marginalized in comparison to automobiles in contemporary American urban planning.

#### **e. Senate Bill 743**

Senate Bill (SB) 743 changed the way transportation impact analysis is conducted under the California Environmental Quality Act (CEQA). Within the State's CEQA Guidelines, these changes include elimination of auto delay, level of service, and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts. In December 2018, new CEQA Guidelines implementing SB 743 (CEQA Guidelines Section 15064.3), along with the Office of Planning and Research's (OPR's) Technical Advisory on Evaluating Transportation Impacts for

CEQA, were finalized and made effective. CEQA Guidelines Section 15064.3, and the associated OPR Technical Advisory, provide that use of automobile Vehicle Miles Traveled (VMT) is the preferred CEQA transportation metric, and correspondingly eliminate auto delay/level of service as the metric for assessing significant impacts under CEQA. Under CEQA Guidelines Section 15064.3, statewide application of the new VMT metric is required beginning on July 1, 2020.

## **4.14.2.2 Local Regulations**

### **a. The Regional Plan**

SANDAG is the regional authority that creates region-specific documents to provide guidance to local agencies, as SANDAG does not have land use authority. SANDAG's San Diego Forward: The 2021 Regional Plan (SANDAG 2015) is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The Regional Plan is updated every four years. The underlying purpose of the Regional Plan is to provide direction and guidance on future regional growth (i.e., the location of new residential and non-residential land uses) and transportation patterns throughout San Diego County as stipulated under SB 375. The Regional Plan establishes a planning framework and implementation actions that increase the region's sustainability and encourage "smart growth while preserving natural resources and limiting urban sprawl." The Regional Plan encourages an increase in residential and employment concentrations in areas with the best existing and future transit connections, and preservation of important open spaces. The Regional Plan's focus is on the implementation of basic smart growth principles designed to strengthen the integration of land use and transportation.

The Regional Plan also addresses border issues and provides an important guideline for communities bordering Mexico. In this case, the goal is to create a regional community where San Diego, its neighboring counties, tribal governments, and northern Baja California mutually benefit from San Diego's varied resources and international location.

### **b. SANDAG Regional Bike Plan**

The Riding to 2050, the San Diego Regional Bike Plan adopted by SANDAG supports implementation of the Regional Plan. It provides a regional strategy to make riding a bike a useful form of transportation for everyday travel. The plan will help San Diego meet its goals to reduce greenhouse gas (GHG) emissions and improve mobility. The goals of the Regional Bike Plan include increasing levels of bicycling; improving bicycling safety; encouraging the development of Complete Streets; supporting reductions in emissions; and increasing community support. In September 2013, the SANDAG Board of Directors approved funding to implement the Regional Bike Plan Early Action Program, which focuses on the region's highest-priority projects. The Regional Bike Plan is currently being updated as part of SANDAG's Active Transportation Program.

### **c. City of San Diego General Plan**

The Mobility Element of the General Plan defines the policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network." The main goals of the Mobility

Element pertain to walkable communities, transit first, street and freeway system, intelligent transportation systems, transportation demand management, bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing. Central to the plan is the “City of Villages” strategy, which focuses growth in pedestrian-friendly, mixed-use activity centers linked to an improved regional transit system. The project includes an update to the City’s General Plan Mobility Element.

#### **d. City of San Diego Bicycle Master Plan**

The City’s Bicycle Master Plan (City of San Diego 2013a) provides a framework for making cycling a more practical and convenient transportation option for a wider variety of San Diegans with varying riding purposes and skill levels. The 2013 Bicycle Master Plan evaluates and builds on the 2002 Bicycle Master Plan so that it reflects changes in bicycle user needs and changes to the City’s bicycle network and overall infrastructure. The City is beginning the process of updating its Bicycle Master Plan.

#### **e. City of San Diego Climate Action Plan**

The City’s 2022 Climate Action Plan (CAP) builds on the 2015 CAP and establishes a citywide goal of net zero GHG emissions by 2035, committing the City to an accelerated trajectory for GHG emissions reductions and making the City more sustainable and healthier for residents. The primary purposes of the CAP are to provide a roadmap for the City to achieve GHG emissions reductions, conform the City’s climate change efforts to California laws and regulations, promote climate equity, implement climate change actions from the General Plan, and provide CEQA tiering for the GHG analysis of new development. The CAP identifies six (6) equity-focused strategies to achieve a goal of net zero emissions by 2035 through reducing and avoiding GHG emissions. The CAP includes a variety of policies under Strategy 3, Mobility and Land Use, which support active transportation use and encourage mixed-use, transit-oriented development.

#### **e. City of San Diego Pedestrian Master Plan**

The City of San Diego has developed a Pedestrian Master Plan (City of San Diego 2006; City of San Diego 2013b) to guide the planning and implementation of pedestrian improvement projects. The Pedestrian Master Plan will help the City enhance neighborhood quality and mobility options by facilitating pedestrian improvement projects and will identify and prioritize improvement projects based on technical analysis and community input, as well as improve the City’s ability to receive grant funding for implementation of pedestrian projects.

#### **f. City of San Diego Mobility Choices Program**

To implement SB 743, the City of San Diego adopted the Mobility Choices Program. The Mobility Choices Program ensures that new development mitigates transportation VMT impacts to the extent feasible, while incentivizing development within the City’s TPAs and urban areas. The Mobility Choices Program included amendments to the San Diego Municipal Code (SDMC) to adopt the Mobility Choices Regulations (Chapter 14, Article 3, Division 11 of the SDMC). Additionally, the Mobility Choices Program included adoption of a new CEQA significance threshold for

transportation to implement SB 743. Notably, the City's Transportation Study Manual (TSM) identifies VMT thresholds, consistent with CEQA Guidelines Section 15064.3.

The Mobility Choices Program was evaluated as part of the City's Complete Communities: Housing Solutions and Mobility Choices Final PEIR (City of San Diego 2020, incorporated by reference herein). The Complete Communities: Housing Solutions and Mobility Choices PEIR found that implementation of the Mobility Choices Program would support reductions in per capita VMT by either requiring the construction of, or funding for, transportation infrastructure and amenities within Mobility Zones 1 and 2 (e.g., Downtown or in a TPA) that would encourage non-vehicular travel. The Complete Communities: Housing Solutions and Mobility Choices PEIR found that implementation of the Mobility Choices Program and the new significance threshold for transportation impacts would result in VMT impacts for any new development that occurs in an area that generates resident VMT per capita or employee VMT per employee that is greater than 85 percent of the base year regional average, absent any mitigation. While the Mobility Choices Regulations were intended to serve as mitigation to ensure an overall reduction in citywide VMT, the PEIR concluded that VMT impacts would remain significant and unavoidable because at a program level of analysis it could not be determined with certainty whether the improvements associated with program implementation would fully mitigate VMT impacts at the project level.

The Mobility Choices Regulations include the identification of Mobility Zones, VMT Reduction Measures as outlined in SDMC Section 143.1103(b) and the Land Development Manual Appendix T, and an Active Transportation In-Lieu Fee used to mitigate VMT impacts from new development in VMT inefficient areas by collecting funds for implementation of active transportation improvements in VMT efficient areas.

### **g. City of San Diego Transportation Study Manual**

The City's TSM, updated September 2022, states that all discretionary projects must complete a Local Mobility Analysis (LMA) unless they meet the following trip generation screening criteria:

- Land uses consistent with the Community Plan/Zoning Designation: Generate less than 1,000 daily unadjusted driveway vehicle trips,
- Land uses inconsistent with the Community Plan/Zoning Designation: Generate less than 500 daily unadjusted driveway vehicle trips, or
- Projects in the Downtown Community Planning Area that generate less than 2,400 daily unadjusted trips.

The LMA is intended to identify the transportation effects of proposed development projects and to determine the need for any improvements to the adjacent and nearby road system to achieve acceptable mobility for vehicles, bicyclists, pedestrians, and transit. While the LMA is required by the City, the analysis is not related to the determination of significance related to transportation impacts under CEQA. However, should the LMA find that road improvements would be necessary to maintain acceptable mobility standards, such improvements would be included as project design features.

The TSM provides guidance for the City's CEQA Significance Determination Thresholds, screening criteria, and methodology for conducting the VMT analysis, while the LMA is required to identify any

off-site infrastructure improvements in the project vicinity that may be triggered with the development of the project. The LMA also analyzes site access and circulation and evaluates the local multi-modal network available to serve the project.

## h. Vision Zero

Refer to Section 4.8.2.3i for a discussion of the City's Vision Zero strategy to eliminate all traffic fatalities and severe injuries associated with transportation.

### 4.14.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to transportation are based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?
- 2) Would the project result in vehicle miles traveled (VMT) exceeding thresholds identified in the City's Transportation Study Manual?
- 3) Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- 4) Would the project result in inadequate emergency access?

For Issue 2, the City's CEQA Significance Determination Thresholds (2022) states the TSM should be used to determine the potential significance of a project, plan, or policy's VMT impacts. VMT analysis for this project is detailed in Appendix J: Vehicle Miles Travelled Analysis Report.

On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process intended to fundamentally change transportation impact analysis under CEQA. The OPR published its latest recommended Technical Advisory on Evaluating Transportation Impacts in CEQA in December 2018. This Technical Advisory provides recommendations on how to evaluate transportation impacts under SB 743. The OPR guidance covers specific changes to the CEQA guidelines and recommends elimination of auto delay for CEQA purposes and the use of VMT as the preferred CEQA transportation metric.

VMT is positively correlated with growth and as the region is expected to grow, VMT is also expected to increase. How and where growth occurs plays a significant role in determining how much VMT will increase. Growth areas are projected to be more VMT efficient with the following: high quality transit service, a complete active transportation network, and complementary land use mixes.

Consistent with OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA (December 2018), the City adopted the TSM in 2020 (updated in 2022) that requires the use of the following VMT metrics for determining the CEQA transportation impacts of land use projects:

- For residential uses, the recommended efficiency metric is Resident VMT per Capita.
- For employment uses, the recommended efficiency metric is Employee VMT per Employee.

- For retail uses, the recommended metric is a net change of total area VMT due to the nature of retail trips typically redistributing shopping trips rather than creating new trips.

Table 3 of the TSM provides the significance thresholds for VMT by land use type which are shown in Table 4.14-1, below.

<b>Table 4.14-1 Significance Thresholds for VMT Impacts</b>	
Land Use Type (see TSM Appendix B for Specific Land Use Designations)	Threshold for Determination of a Significant Transportation VMT Impact**
Residential	15% below regional mean* VMT per Capita
Commercial Employment	15% below regional mean* VMT per Employee
Industrial and Agricultural Employment	Regional mean* VMT per Employee
Regional Retail	Zero net increase in total regional VMT*
Hotel	See Commercial Employment
Regional Recreational	See Regional Retail
Regional Public Facilities	See Regional Retail
Mixed-Use	Analyze each land use individually per above categories
Redevelopment	Apply the relevant threshold based on proposed land use (ignore the existing land use)
Transportation Projects	Zero net increase in total regional VMT*
* The regional mean and total regional VMT are determined using the SANDAG Regional Travel Demand Model. The specific model version and model year will be identified by the Development Services Department's Transportation Development Section.	
**Projects that exceed these thresholds would have a significant impact.	

While the metrics and thresholds in Table 4.14-1, Significance Thresholds for VMT Impacts, are appropriate at the project level, both OPR and the City recognize that for large land use plans such as the General Plan and Community Plans, proposed new residential, office and retail land uses should be considered in aggregate (OPR 2018). Locally serving retail land uses are presumed to have a less than significant impact on VMT. However, it is not possible at the program level to isolate the components of citywide proposed retail land uses that may be regionally serving which may have a significant VMT impact verses those that are locally serving and would be presumed to have a less than significant VMT impact. In addition, it is not possible to isolate the component of VMT attributable only to proposed retail land uses because net regional VMT changes referred to in Table 4.14-1 and provided by the transportation forecasts include those caused by population and employment growth as well as proposed land use, transportation network, and policy changes. For retail land uses it is more appropriate to identify VMT impacts and potential mitigation measures at the project level.



## 4.14.4 Impact Analysis

### Issue 1 Transportation Policy Consistency

*Would the project conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?*

The project would not conflict with any adopted transportation policies, plans, and programs including those supporting transit, bicycle, and pedestrian facilities. The project would allow for an increase in transit supportive residential densities and non-residential intensities in locations where existing or planned transit would be available consistent with the planned 2050 regional transportation network. The Village Climate Goal Propensity Map, which was developed with the 2050 regional transportation network in mind, provides a framework for directing land uses within areas that would align with existing and planned transit infrastructure, such as Caltrans's proposed Purple Trolley line, which would provide commuter transit service from the US-Mexico border to Sorrento Valley. The overall goal is to increase opportunities for homes and jobs in locations that would cause a shift in mode share from single occupancy vehicles to walking/rolling, bicycling, and transit use as planned transit infrastructure is implemented. The land use framework provided in the Blueprint SD Initiative would facilitate development within Climate Smart Village Areas with an overall goal of reducing citywide per capita VMT that is consistent with and supportive of the goals of the City's General Plan, CAP, and the Regional Plan, because it supports transit-oriented, mixed-use development. Within the University CPU area and Hillcrest FPA area, increases in density are consistent with the land use framework identified in the Village Climate Goal Propensity Map, allowing for increases in density in locations near existing or planned transit infrastructure to support shifts in mode share and reductions in per capita VMT.

The project is consistent with other adopted policies, plans, and programs supporting the transportation system as it strives to improve mobility through a balanced, multi-modal transportation network with planned improvements to pedestrian, bicycle, transit, and roadway facilities. Additionally, the project provides policies that support improvements to pedestrian, bicycle, transit, and roadway facilities while reducing per capita VMT and increasing alternative mode share. All transportation facilities would be designed in accordance with applicable City standards.

The Blueprint SD Initiative includes updated policies to align the General Plan with policies in the City's CAP and the Regional Plan. Applicable General Plan policies include, but are not limited to:

#### Walkable/Rollable Communities Policies

- Policy ME-A.10: Create walkable destinations equitably across the City by increasing opportunities for placemaking and community gathering spaces, facilitating outdoor dining, and allowing for the creation of more designated space for active transportation.
- Policy ME-A.11: Support opportunities to convert undeveloped right-of-way or underutilized paper streets into trails, enhanced urban pathways, multi-use paths, or public spaces that encourage outdoor activity and active transportation.

### Bicycle Policies

- Policy ME-B.2b: Develop and maintain a comprehensive, integrated system of reduced stress bikeways to help encourage community members to cycle for commuting and daily needs.
- Policy ME-B.3: Maintain and improve the quality, operation, and integrity of the bikeway network and roadways regularly used by bicyclists.
  - Provide buffered or separated bikeways along major roadways where vehicle speeds and volumes are higher.
  - Provide treatments such as wayfinding and markings, colored pavement, bicycle signals, bike boxes, and protected intersections to enhance the safety, comfort and enjoyability for all levels of bicycle riders.
  - Implement high-quality bicycle facilities, treatments, and amenities as roadways are resurfaced and/or rights-of-way become available.

### Shared Use Mobility Policies

- Policy ME-C.1: Expand shared mobility program coverage by identifying suitable locations for shared micro-mobility stations and geographic areas where a program should operate.
  - Ensure that shared micro-mobility program(s) focus on connecting neighborhoods, business districts, and high demand destinations.
  - Deploy shared mobility devices near active transportation facilities.
  - Improve the convenience and the user experience in accessing visitor destinations via shared mobility devices.
  - Work with public and private entities, such as large employers, colleges, and public agencies, to provide access to shared mobility devices.
- Policy ME-C.2: Designate shared mobility device parking zones or corrals in commercial and recreational areas, schools, transit stations, mobility hubs, activity centers, and visitor destinations.
- Policy ME-C.3: Partner with shared mobility device operators to optimize availability in mobility hubs and near transit and to promote “first/last-mile” application of these devices, especially during peak hours.

### Transit Policies

- Policy ME-D.1.e: Coordinate to provide seamless transfers between transit service and other modes (i.e., micro-mobility) and systems.
- Policy ME-D.10: Support commuter, intercity and high-speed passenger rail transportation projects that will provide travel options and improve the quality of service for intercity travel while minimizing adverse impacts to communities.
- Policy ME-D.11: Support intermodal stations to facilitate transfer of passengers between modes and expand the convenience, range, and usefulness of transportation systems implemented in the City.
- Policy ME-D.12: Locate future [passenger rail] stations adjacent to villages with high-density employment or residential uses.
- Policy ME-D.15: Support a stable, multi-year transportation funding policy for passenger rail services that meets the goal of improved rail travel opportunities.
- Policy ME-D.18: Improve transit connections by investing in first-mile/last-mile solutions.

- Policy ME-D.19: Support and develop mobility hubs of different scales to provide a diverse set of amenities that encourage multi-modal trips, for all trip types, and to serve as connection points between transit, shared micro-mobility services, and other private transportation services.

#### Intelligent Transportation Systems

- Policy ME-F.6: Support the use of technology to improve transit services through tracking vehicles, maintaining schedules, predicting demand, facilitating fare payment, and operating fleets more efficiently.
- Policy ME-F.8: Support the upgrade of communications systems and signal controllers to improve traffic congestion and safety.

Policies within the University CPU that would align with policies in the General Plan, the City's CAP and the Regional Plan include, but are not limited to:

- Policy 3.1A: Create continuous pedestrian and bicycle networks with amenities to further accommodate and encourage residents to walk or ride a bike for their commuting and daily needs.
- Policy 3.2B: Implement physical and operational street improvements to support the City's Vision Zero initiative, such as narrowing corner radii, roundabouts, other traffic calming measures, pedestrian hybrid beacons, and lead pedestrian intervals (LPI), where appropriate, to improve safety and visibility, reduce crossing distances, and reduce speeds and conflicts from motorists.
- Policy 3.3E: Enhance safety, comfort, and accessibility for all levels of cyclists along bikeways and at intersections with features that improve visibility and physical separation from vehicles, such as loop detection, bicycle signals, bike boxes, No Right Turn on Red restrictions, bicycle rails, slip ramps, lighting, wayfinding, signage, pavement markings, and buffered or separated facilities.
- Policy 3.3I: Support future bicycle connections throughout the University Community in coordination with property owners, including but not limited to: (1) A connection between John J. Hopkins Drive via Cray Court and/or Spectrum Bridge; (2) A connection between the Coastal Real Trail and SR-56 bicycle path via Sorrento Valley Road.
- Policy 3.4C: Encourage new residential, office, and commercial developments, as well as any new parking facilities, to provide spaces for micromobility.
- Policy 3.5A: Coordinate with MTS and SANDAG to increase transit infrastructure and service enhancement opportunities within University, including those identified in the adopted Regional Plan and future updates of the Regional Plan.
- Policy 3.7B: Utilize Intelligent Transportation Systems (ITS) improvements to enhance vehicular operations on roadways and to provide real-time travel information for all users.
- Policy 3.7C: Facilitate the implementation of ITS and emerging technologies to help improve public safety, reduce collisions, minimize traffic congestion, maximize parking efficiency, manage transportation and parking demand, and improve environmental awareness and neighborhood quality.

Updated policies within the Uptown Community Plan resulting from the Hillcrest FPA that would align with policies in the General Plan, the City's CAP and the Regional Plan include, but are not limited to:

- Policy MO-1.3: Consider traffic calming measures such as raised intersections, corner bulb-outs, roundabouts/traffic circles along pedestrian corridors.
- Policy MO-1.6: Implement pedestrian enhancements within identified pedestrian focus areas developed as part of the pedestrian planning effort. These enhancements include but are not limited to bulb-outs/curb extensions, pedestrian promenades, enhanced crossing treatments, traffic calming, leading pedestrian intervals, continental crosswalk and exclusive pedestrian phases.
- Policy MO-2.4: Support bicycle facilities on Washington Street, University Avenue, Park Boulevard, Laurel Street, Juniper Street, San Diego Avenue, Third Avenue, Fourth Avenue, Fifth Avenue, Sixth Avenue, Robinson Avenue, and Bachman Place.
- Policy MO-3.13: Coordinate with SANDAG and MTS on the feasibility of an aerial skyway connecting Hillcrest and Mission Valley.
- Policy MO-3.14: Support a transit connection between the Hillcrest UCSD campus and the La Jolla UCSD campus.
- Policy MO-3.15: Consider public-private partnerships to enhance transit connections and encourage the implementation of mobility hubs.

The project would support citywide and regional programs, plans, ordinances, or policies addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities; therefore, impacts would be less than significant.

## Issue 2 Vehicle Miles Traveled

*Would the project result in vehicle miles traveled (VMT) exceeding thresholds identified in the City of San Diego Transportation Study Manual?*

SANDAG's Activity Based Model (ABM) was used to calculate the project's VMT. The proposed land uses and Regional Plan mobility network were inputs to the model to develop future travel forecasts and VMT. Attachment B of Appendix J provides details on the methodology for the modeling of this project. For the project's VMT analysis the following modelling scenarios were utilized:

- Base Year (2016) – The calibrated base year model SANDAG used for the 2021 Regional Plan 2023 Amendment.
- City of San Diego Model Run 1 (2050) – Is the low estimate density for the Blueprint SD Initiative's Climate Smart Village Areas, which are areas with a village propensity value of 7 through 14, with the proposed regional mobility network from the 2021 Regional Plan 2023 Amendment.
- City of San Diego Model Run 2 (2050) – Incorporates proposed land uses from the University CPU and Hillcrest FPA with the proposed regional mobility network from the 2021 Regional Plan 2023 Amendment while maintaining the Blueprint Model Run 1 unit growth for the remaining communities except in the Clairemont Mesa and College Area communities where

draft proposed CPU land uses were included (e.g. land uses that align with the Village Climate Goal Propensity map).

- City of San Diego Model Run 3 (2050) – Is the high estimate density for Blueprint SD Initiative’s Climate Smart Village Areas with the proposed regional mobility network from the 2021 Regional Plan 2023 Amendment.

## a. Blueprint SD Initiative VMT Analysis

### ***Residential and Employment VMT***

Table 4.14-2 presents the City of San Diego resident and employee VMT efficiency metrics for Base Year conditions. Under Base Year conditions, the City is above the threshold of 85 percent of the regional mean for both efficiency metrics at 92 percent and 104 percent of the Base Year regional means for both VMT per Capita (Residents) and VMT per Employee (Employment), respectively (see Attachment F of Appendix J).

	2016 Regional Mean <sup>1</sup>	2016 Base Year	
		Citywide Mean <sup>1</sup>	Percent of 2016 Regional Mean
VMT per Capita (Residents)	19.1	17.6	92%
VMT per Employee (Employment)	19.1	19.8	104%

<sup>1</sup>SOURCE: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, VMT Report Scenario ID 186 (Attachment F of Appendix J)

By 2050, under the Blueprint SD Initiative, the VMT efficiency substantially improves in both the higher density (Model Run 3) and lower density (Model Run 1) modeling scenarios. Table 4.14-3 presents the Blueprint SD Initiative’s 2050 resident and employee VMT for the City of San Diego. Under the Blueprint SD Initiative, the City is projected to have VMT per Capita between 13.3 and 14.4 and VMT per Employee between 13.2 and 14.2, which are 70 to 75 percent and 69 to 74 percent, respectively, of the Base Year regional means (see Attachment F of Appendix J). VMT associated with the residential and employment land uses would not exceed the thresholds and would be less than significant assuming full implementation of the Blueprint SD Initiative and the Regional Plan. However, at a programmatic level of analysis, it is not possible to ensure that full implementation of the Regional Plan’s transportation investments and the timing of these investments with the specific development would occur. Therefore, residential and employment VMT impacts would be considered significant.

Table 4.14-3 VMT CEQA Analysis for the Blueprint SD Initiative				
	2016 Regional Mean <sup>1</sup>	2050 Blueprint SD Initiative		
		Citywide Mean <sup>2</sup>	Percent of 2016 Regional Mean	Exceeds Threshold <sup>3</sup> (Yes/No)
VMT per Capita (Residents)	19.1	13.3a - 14.4b	70% - 75%	No
VMT per Employee (Employment)	19.1	13.2a - 14.2b	69% - 74%	No
<sup>1</sup> Source for 2016 Regional Mean is SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, VMT Report Scenario ID 186 <sup>2</sup> Sources for citywide means are: aSANDAG ABM 2+, Blueprint Model Run 3 Scenario - SB 743 VMT Report, Scenario ID 321 and bSANDAG ABM 2+, Blueprint Model Run 1 Scenario - SB 743 VMT Report, Scenario ID 319 (see Attachment F of Appendix J) <sup>3</sup> Threshold is 85% of the 2016 Regional Mean VMT per Capita or VMT per Employee, respectively				

### **Retail VMT**

While the metrics and thresholds in Table 4.14-3 are appropriate at the project level, both OPR and the City recognize that for large land use plans such as the General Plan and Community Plans, proposed new residential, office and retail land uses should be considered in aggregate (OPR 2018). According to OPR's 2018 Technical Advisory on evaluating transportation impacts in CEQA, locally serving retail land uses typically capture existing trips and are therefore often considered to have a less than significant related to VMT (refer to the City's TSM for detailed screening criteria related to locally serving retail). Specific projects would require review for consistency with the City's TSM screening criteria for locally serving retail. As detailed in the City's TSM, a locally serving retail project would be screened out from further VMT analysis if it is a retail project of 100,000 square feet gross floor area or less that is able to demonstrate through a market area study that the market capture area for the project is approximately three miles (or less) and serves a population of roughly 25,000 people or less.

At the program level, it is not possible to isolate the components of citywide proposed retail land uses that may be regionally serving which may have a significant VMT impact verses those that are locally serving and would be presumed to have a less than significant VMT impact because no site-specific development projects are proposed at this time. However, as future retail land uses that require a discretionary approval are proposed, the City would apply the TSM to ensure individual project VMT impacts are considered in the context of the specific project type and VMT generation.

In addition, at a program level of review it is not possible to isolate the component of VMT attributable only to proposed retail land uses because net regional VMT changes provided by the transportation forecasts include those caused by population and employment growth as well as proposed land use, transportation network, and policy changes. For retail land uses, it is more appropriate to identify VMT impacts and potential mitigation measures at the project level, consistent with the City's TSM. In addition, at this program level of analysis it is not possible to ensure that full implementation of the Regional Plan's transportation investments and timing to



support access to retail land uses would occur. Therefore, retail VMT impacts would be ~~considered~~ significant.

## b. University Community Plan Update VMT Analysis

### ***Residential and Employment VMT***

Table 4.14-4 presents the University CPU's resident and employee VMT efficiency metrics for Base Year conditions. Under Base Year conditions, the University CPU exceeds the thresholds due to base year VMT being above 85 percent of the regional means for both VMT per Capita (Residents) and VMT per Employee (Employment). VMT per Capita (Residents) is at 90 percent of the Base Year regional mean and VMT per Employee is at 126 percent of the Base Year regional mean (-see Attachment F of Appendix J).

	2016 Regional Mean <sup>1</sup>	2016 Base Year	
		University Community Plan Area Mean <sup>2</sup>	Percent of 2016 Regional Mean <sup>3</sup>
VMT per Capita (Residents)	19.1	17.1	90%
VMT per Employee (Employment)	19.1	24.0	126%

<sup>1</sup>SOURCE: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, VMT Report Scenario ID 186 (Attachment F of Appendix J)  
<sup>2</sup>SOURCE: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, TFIC SB 743 VMT Maps Scenario ID 458 (Attachment F of Appendix J)  
<sup>3</sup>Threshold is 85% of the 2016 Regional Mean VMT per Capita or VMT per Employee, respectively

By 2050, with the implementation of the University CPU in addition to the mobility improvements identified in the SANDAG Regional Plan, the VMT efficiency substantially improves in Model Run 2, which best reflects the proposed CPU land uses in University. -Table 4.14-5 presents the University CPU resident and employee VMT for 2050 which is projected to have a VMT per Capita at 11.5 and an VMT per Employee at 16.3, which are 60 percent and 85.3 percent, respectively, of the Base Year regional means (see Attachment F of Appendix J). With implementation of the SANDAG Regional Plan, VMT associated with the residential land uses would not exceed the 85 percent thresholds at buildout of the University CPU and would be less than significant. However, for the purpose of this program level analysis, it cannot be ensured that full implementation of the Regional Plan's transportation investments would occur. Therefore, residential VMT impacts would be significant. VMT associated with employment land uses would exceed the 85 percent threshold at buildout of the University CPU and would be ~~considered~~ significant.

<b>Table 4.14-5 Resident and Employee VMT - University Community Plan Update</b>				
	2016 Regional Mean <sup>1</sup>	2050 University CPU		
		University Community Plan Area Mean <sup>2</sup>	Percent of 2016 Regional Mean	Exceeds Threshold <sup>3</sup> (Yes/No)
VMT per Capita (Residents)	19.1	11.5	60%	No
VMT per Employee (Employment)	19.1	16.3	85.3%	<b>Yes</b>
<sup>1</sup> SOURCE: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, VMT Report Scenario ID 186 (Attachment F of Appendix J) <sup>2</sup> SOURCE: SANDAG ABM 2+, Blueprint Model Run 2 Scenario - SB 743 VMT Report, Scenario ID 320 (Attachment F of Appendix J) <sup>3</sup> Threshold is 85% of the 2016 Regional Mean VMT per Capita or VMT per Employee, respectively				

### ***Retail VMT***

While the metrics and thresholds in Table 4.14-5, Resident and Employee VMT–University Community Plan Update, are appropriate at the project level, both OPR and the City recognize that for large land use plans such as the General Plan and Community Plans, proposed new residential, office and retail land uses should be considered in aggregate. Locally serving retail land uses are presumed to have a less than significant impact on VMT. Due to the presence of the UTC Mall in the University CPU area, it is not possible at the program level to isolate proposed retail land uses that may be regionally serving, and which may have a significant VMT impact versus those that are locally serving and would be presumed have a less than significant VMT impact. In addition, it is not possible to isolate the component of VMT attributable solely to proposed retail land uses due to net regional VMT changes reflecting those caused by population and employment growth as well as proposed land use, transportation network, and policy changes. For retail land uses, it is more appropriate to identify VMT impacts and potential mitigation measures at the project level. At this programmatic level of analysis, retail VMT impacts would be considered significant.

### **c. Hillcrest Focused Plan Amendment VMT Analysis**

#### ***Residential and Employment VMT***

Table 4.14-6 presents the Hillcrest FPA's resident and employee VMT efficiency metrics for Base Year conditions. Under Base Year conditions, the Hillcrest FPA is below the threshold for the VMT per Capita (Residents) metric at 75 percent of the Base Year regional mean while VMT per Employee (Employment) for the Hillcrest FPA is 87 percent of the Base Year regional averages, which exceeds the threshold (see Attachment F of Appendix J).

Table 4.14-6 Base Year VMT Metrics – Hillcrest FPA			
	2016 Regional Mean <sup>1</sup>	2016 Base Year	
		Hillcrest FPA Mean <sup>2</sup>	Percent of 2016 Regional Mean <sup>3</sup>
VMT per Capita (Residents)	19.1	14.2	75%
VMT per Employee (Employment)	19.1	16.5	87%

<sup>1</sup>SOURCE: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, VMT Report Scenario ID 186 (Attachment F of Appendix J)  
<sup>2</sup>SOURCE: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, VMT Report Scenario ID 186 (Attachment F of Appendix J)  
<sup>3</sup>Threshold is 85% of the 2016 Regional Mean VMT per Capita or VMT per Employee, respectively

By 2050 with the implementation of the Hillcrest FPA, the VMT efficiency substantially improves in Model Run 2 which best reflects the proposed FPA land uses in Hillcrest. Table 4.14-7 presents the Hillcrest FPA resident and employee VMT for 2050 which is projected to have a Resident VMT per Capita at 5.7 and an Employee VMT per Employee at 9.4, which are 30 percent and 50 percent, respectively, of the Base Year regional averages (see Attachment F of Appendix J). VMT associated with the residential and employment land uses would not exceed the 85 percent thresholds at buildout of the Hillcrest FPA and would be less than significant based on the Hillcrest FPA land uses and the implementation of the Regional Plan. However, at this programmatic level of analysis, it cannot be ensured that full implementation of the Regional Plan's transportation investments would occur. Therefore, residential and employment VMT impacts would be considered significant.

Table 4.14-7 Resident and Employee VMT for Hillcrest Focused Plan Amendment				
	2016 Regional Mean <sup>1</sup>	2050 Hillcrest Focused Plan Amendment Buildout		
		Hillcrest FPA Mean <sup>2</sup>	Percent of 2016 Regional Mean	Exceeds Threshold <sup>3</sup> (Yes/No)
VMT per Capita (Residents)	19.1	5.7	30%	No
VMT per Employee (Employment)	19.1	9.4	50%	No

<sup>1</sup>SOURCE: SANDAG ABM 2+ RP 2021, 2016 Base Year Scenario, VMT Report Scenario ID 186 (Attachment F of Appendix J)  
<sup>2</sup>SOURCE: SANDAG ABM 2+, Blueprint Model Run 2 Scenario - SB 743 VMT Report, Scenario ID 320 (Attachment F of Appendix J)  
<sup>3</sup>Threshold is 85% of the 2016 Regional Mean VMT per Capita or VMT per Employee, respectively

### **Retail VMT**

Although total VMT generated by all land uses is expected to increase under future buildout of the Hillcrest FPA, it is anticipated that development under the Hillcrest FPA would maintain and possibly expand neighborhood and community-serving retail.- Per the City's TSM and OPR's Technical Advisory "local-serving retail development tends to shorten trips and reduce VMT. Thus, lead agencies generally may presume such development creates a less-than significant transportation

impact.” Within the Hillcrest FPA, all retail would be locally serving due to size limitations imposed by the City’s base zoning in this area. Consistent with the City’s TSM and OPR’s Technical Advisory, impacts related to VMT for retail land uses within the Hillcrest FPA would be less than significant.

### Issue 3 Design Feature

*Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The project accommodates all modes of transportation. The future design of roadways and roadway modifications included in the project would be required to conform with applicable federal, state, and City design criteria which contain provisions to minimize roadway hazards. Compliance with these standards including, but not limited to, the City’s LDC, Standard Drawings, and Street Design Manual to the satisfaction of the City -Engineer would avoid impacts related to roadway hazards due to design features or incompatible uses. Furthermore, the project would improve existing transportation deficiencies by providing higher quality bicycle facilities and improving pedestrian connectivity by eliminating gaps in the pedestrian network. Enhancements include implementation of leading pedestrian intervals, protected intersections, separated bicycle facilities, and flexible lanes. These multi-modal enhancements are intended to improve safety for all users of the roadway. Refer also to Section 4.8.4, Issue 5 for a discussion of applicable policies that support roadway network safety and accessible. Refer also to Section 4.18.4 Issue 2 for a discussion of the applicable regulations and evacuation routes that support emergency response and evacuation. The project is not associated with incompatible uses that could increase hazards.- Additionally, implementation of the City’s Vision Zero supports elimination of traffic fatalities and injuries associated with transportation.- Therefore, impacts related to hazardous design features would be less than significant.

### Issue 4 Emergency Access

*Would the project result in inadequate emergency access?*

#### a. Blueprint SD Initiative

The Blueprint SD Initiative includes policies to address emergency access and does not include any requirements that would result in inadequate emergency access. The General Plan Mobility Element includes policy ME-E.9, which supports improvements to operations and maintenance on City streets and sidewalks including maintenance for all users including emergency vehicles. Implementation of the Blueprint SD Initiative may include implementation of traffic calming devices; however, General Plan Mobility Element policy ME-E.10.e requires traffic calming measures to include consideration of any potential undesired effects such as increased travel times, emergency response times, noise, and traffic diversion. As required by the City’s TSM, it is also anticipated that future CPUs would include a mobility study, while community plan updates, land use plan amendments, and discretionary projects would be required to complete an LMA as necessary to identify propose improvements to the circulation and mobility network in their project areas, as necessary, to address potential emergency access issues, consistent with City regulations and the

TSM. Future development in accordance with the Blueprint SD Initiative would be required to comply with all applicable City regulations related to emergency access including the California Fire Code, the SDMC Chapter 5, Article 5, Division 87: Appendix D – Fire Apparatus Access Roads, and would also be reviewed for consistency with applicable emergency access policies such as City fire policies A-14-1 Fire Access Roadways, A-14-9 Access Roadways: Modified Roadway Surface, and A-14-10 Fire Apparatus Access Road for Existing Public Streets. In addition, per FPB Policy A-14-1, future developments would be reviewed by the City Fire Marshal to ensure that emergency access is provided.

Throughout the City and beyond, there are generally adequate emergency evacuation routes through the major interstate system, local highways, and prime arterials within San Diego County. As the project would not result in land use changes that would impede emergency evacuation and future projects would be required to demonstrate consistency with the City's regulatory framework related to emergency access, impacts related to emergency access would be less than significant.

## **b. University Community Plan Update**

The University CPU would improve circulation and mobility for all modes of travel throughout the CPU area. In addition, the University CPU has identified dedicated roadway space for transit along several key corridors through the implementation of Sustainable Mobility for Adaptive and Reliable Transportation (SMART) Corridors and Flexible (Flex) Lanes in the University CPU area (Figure 3-22). SMART Corridors are major arterial roadways that provide access to or between at least two freeways and where mobility improvements are made for transit and other congestion-reducing mobility forms through the re-purposing of roadway space. Flex Lanes are re-purposed lanes for transit and/or other congestion-reducing mobility forms; and provide dedicated space for moving people more efficiently through a corridor. These proposed improvements will encourage more people to choose transit as their preferred mode of transportation, which would reduce traffic congestion, and improve circulation efficiency. Further, these flexible or transit only facilities lanes can be re-purposed utilized for as-needed for emergency access, which will also be available for emergency vehicles thereby improving emergency access in the area. The UC University CPU also includes policies which call for the implementation of ITS infrastructure, including but not limited to Ppolicies 3.7B and 3.7C. As these systems come online, they would further improve the efficiency of the transportation network. With the recent (2021) construction of the North University City Fire Station 50 and the ongoing construction of Torrey Pines Fire Station 52, these stations will better serve the area and improve emergency response times increase emergency access throughout the community along with the existing Eastgate Mall Fire Station 35.

At buildout, the University CPU would result in an overall community-wide increase of approximately 40,582,000~~36,803,000~~ square feet of planned non-residential floor area and approximately 30,480~~29,000~~ additional planned residential units over existing conditions (see Tables 3-3 and 3-4). Emergency personnel and residents This growth would use existing roadways with the proposed improvements identified in the University CPU and freeways for emergency access and emergency evacuation purposes. Specifically, the University CPU area has a number of transportation corridors that can serve as emergency access and emergency evacuation routes. I-5 traverses the University CPU area along its western edge in the south and traverses through the central portion of the community as it heads north. I-805 generally forms the eastern boundary of the University CPU area

while SR-52 forms the southern boundary of the University CPU area. These major emergency access and evacuation routes are accessible from Regents Road, Genessee Avenue, Governor Drive, Nobel Drive, Gillman Drive/La Jolla Colony Drive, and Sorrento Valley Road. For roadway facilities where vehicular lane reductions are planned, such as with reduced Governor Drive, vehiculars the full width of the existing right-of-way (including bike lanes) could be used for emergency access and vehicular evacuation in an emergency as directed by emergency personnel. Emergency-imposed traffic routing could also redirect all traffic to drive in one direction away from a potential hazard or emergency situation.

In addition to these major transportation routes, the University CPU area has access to the Mid-Coast Trolley system which could facilitate emergency evacuation efforts. The highest intensity development in the University CPU area is focused around areas with transit access and access to major transportation corridors. In addition to existing transit, there are future transit improvements planned over the planning horizon (see Figure 3-22 and 3-23).

Within the University CPU area, limited north south connections are available, with Genessee Avenue serving as the main north south connection within the community and I-805 providing a north south connection along the eastern edge of the community via SR-52. However, the southern portion of the University CPU area, south of Rose Canyon has access to existing emergency access and evacuation routes including Regents Road to SR-52 and south to Clairemont Mesa Boulevard, Genessee Avenue in both north and south directions, and Governor Drive east to I-805.

As future development is proposed consistent with the University CPU, the City would consider the adequacy of emergency access and emergency evacuation routes. Generally, the anticipated location of development would have ready access to transit and major transportation corridors. Based on the existing roadway network in place combined with improvements required by the City as development occurs and required consistency with the Fire Code, impacts related to ensure emergency access within the University CPU area would be less than significant.

### **c. Hillcrest Focused Plan Amendment**

The Hillcrest FPA area is primarily located within an established, developed urbanized area. Access to I-5 via University Avenue and Washington Street, access to SR-163 from University Avenue, Washington Street and Robinson Avenue, and access to I-805 to the east via University Avenue or El Cajon Boulevard provide substantial emergency access and evacuation routes in the event of an emergency.

Planned mobility improvements in the Hillcrest FPA would improve mobility throughout the FPA area for all modes of travel. As it pertains to emergency access, the Hillcrest FPA contains policies supporting operational improvements to facilitate ingress and egress of all vehicles. Refer to Uptown Community Plan policies MO-4.8, 4.9, 4.10 and 4.11 that are applicable to development within the Hillcrest FPA area. In addition, the Hillcrest FPA has identified dedicated roadway space for transit along University Avenue between Fourth Avenue and Park Boulevard in the Hillcrest community (see Figure 3-12), which will also be available for emergency vehicles thereby improving emergency access in the area. The Uptown Community Plan includes a number of policies applicable to the Hillcrest FPA which would support emergency access improvements as detailed in Section



4.8.4, Issue 5. Therefore, implementation of the Hillcrest FPA would not create significant impediments for emergency access, and impacts would be less than significant.

## Cumulative Impacts

Regarding transportation policy consistency, the analysis under Issue 1 addresses the consistency of the project with adopted programs, plans, ordinances and policies addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities. As no policy conflicts have been identified, cumulative impacts related to transportation policy would be less than significant.

The VMT analysis provided under Issue 2 is by nature a cumulative issue. Therefore, as discussed under Issue 2, residential, employee, and retail VMT impacts associated with the Blueprint SD Initiative and University CPU would be cumulatively significant. Residential and employment VMT impacts associated with the Hillcrest FPA would be cumulatively significant, and cumulative retail VMT impacts associated with the Hillcrest FPA would be less than significant.

Cumulative impacts associated with increased hazards due to design features would be less than significant as those issues are site-specific and would not compound or increase in combination with project development elsewhere in the project area.

Future development in accordance with the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be required to comply with all applicable City codes and regulations related to emergency access including the California Fire Code and the SDMC, and would be reviewed for consistency with policies related to emergency access.

Through implementation of project specific requirements for roadway improvements consistent with the Fire Code, TSM, and the SDMC, and adherence to City policies and regulations, cumulative emergency access impacts associated with the Blueprint SD Initiative, University CPU, and the Hillcrest FPA would not be cumulatively considerable and cumulative impacts would be less than significant.

## 4.14.5 Significance of Impacts

### 4.14.5.1 Transportation Policy Consistency

Overall, the project would support improved pedestrian, bicycle and transit facilities and foster increased safety for all alternative modes by facilitating higher density development within areas closer to existing and planned transit. Additionally, the project provides policies that support improvements to pedestrian, bicycle, transit, and roadway facilities while reducing per capita VMT and increasing alternative mode share. Thus, the project would not conflict with an adopted program, plan, ordinance, or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities, and impacts would be less than significant.

### 4.14.5.2 Vehicle Miles Traveled

The project would have a significant VMT impact at the program level due to residential, employment, and retail VMT exceeding 85 percent of the regional mean.- Although the model results show that VMT per capita (residents) for the Blueprint SD Initiative, University CPU, and Hillcrest FPA, and VMT per employee (employment) for the Blueprint SD Initiative and Hillcrest FPA would fall below the City's significance thresholds, these model results assume full implementation of the SANDAG Regional Plan transportation investments, for which the timing of these investments cannot be ensured. For the University CPU, even assuming full implementation of the SANDAG Regional Plan transportation investments, VMT per employee would be 85.3 percent of the regional mean, -resulting in a significant VMT per employee impact under the University CPU. Overall, due to the fact that completion of all the SANDAG Regional Plan transportation investments cannot be ensured and future project-specific review is required for consistency with the City's TSM, at a program level of review, residential and employment VMT impacts of the Blueprint SD Initiative, Hillcrest FPA, and University CPU ~~†~~would be significant and retail VMT impacts of the Blueprint SD Initiative and University CPU would be significant; however, retail VMT impacts under the Hillcrest FPA would be less than significant.

### 4.14.5.3 Design Feature

Any proposed improvements to roadways or amenities such as bicycle facilities would undergo review and approval by the City Engineer. Adherence to City standards, including the City's Street Design Manual, would ensure that a substantial increase in hazards or incompatible uses would not occur as a result of the proposed project. The proposed project does not include any requirements that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts would be less than significant.

### 4.14.5.4 Emergency Access

The major interstate system, local highways, and prime arterials in the City serve as emergency access and emergency evacuation routes throughout the City. The University CPU area has a number of transportation corridors that can serve as emergency access and emergency evacuation routes including I-5, I-805, and SR-52, which are accessible from Regents Road, Genessee Avenue, Governor Drive, Nobel Drive, Gillman Drive/La Jolla Colony Drive, and Sorrento Valley Road. Further, the University CPU has identified dedicated roadway space for transit along several key corridors through the implementation of SMART Corridors and Flex Lanes in the University CPU area (Figure 3-22). These proposed improvements will encourage more people to choose transit as their preferred mode of transportation, which would reduce traffic congestion, and improve circulation efficiency. These flexible or transit only lanes can also be utilized as-needed for emergency access thereby improving emergency access in the area. The University CPU also includes policies which call for the implementation of ITS infrastructure. As these systems come online, they would further improve the efficiency of the transportation network.

Within the Hillcrest FPA area, access to I-5 via University Avenue and Washington Street, access to SR-163 from University Avenue, Washington Street and Robinson Avenue, and access to I-805 to the east via University Avenue or El Cajon Boulevard provide substantial emergency access and

evacuation routes in the event of an emergency. Future development in accordance with the project would be required to comply with all applicable City codes related to emergency access, including the City's Fire Code and the SDMC, would be reviewed for consistency with policies related to emergency access, and would be forwarded to the City Fire Marshall to ensure adequate emergency access. Through implementation of project specific requirements for roadway improvements consistent with the Fire Code, TSM, and the SDMC, and adherence to City policies and regulations, impacts associated with emergency access would be less than significant.

## 4.14.6 Mitigation, Monitoring, and Reporting

Mitigation measures are provided at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific projects are proposed. Where the mitigation measure refers to City regulations, these are included as the City's regulations provide a standardized process for addressing development impacts across the City and include a process for which impacts can be addressed at a more project-specific level. All development projects are subject to the City's LDC regulations, many of which are put in place for the specific purpose of mitigating or reducing environmental impacts through due to the regulations including detailed performance standards that serve as mitigation when implemented at the project level. Therefore, these regulations are referenced as required mitigation measures.

### 4.14.6.1 Transportation Policy Consistency

Impacts would be less than significant; no mitigation is required.

### 4.14.6.2 Vehicle Miles Traveled

VMT mitigation is provided at the program level to serve as the basis for more specific refinement of project specific mitigation as specific projects are proposed. The following mitigation framework provides a program-level framework intended to for reducing significant impacts related to VMT if implemented.

#### **MM-TRANS-1 – Achieve VMT Reductions**

Future development shall be required to demonstrate compliance with the City's Mobility Choices Ordinance (SDMC Section 143.1103 et seq.) and the City's TSM, including preparation of a VMT analysis and local mobility analysis, where applicable.

#### **MM-TRANS-2 – Community Plan Updates**

Future community plan updates shall demonstrate that future residential and nonresidential VMT levels are below the City's CEQA Significance Determination Thresholds on a citywide basis, with the implementation of the SANDAG Regional Plan.

### 4.14.6.3 Design Feature

Impacts would be less than significant; no mitigation is required.

#### 4.14.6.4 Emergency Access

Impacts would be less than significant; no mitigation is required.

### 4.14.7 Significance after Mitigation

#### 4.14.7.1 Transportation Policy Consistency

Impacts would be less than significant; no mitigation is required.

#### 4.14.7.2 Vehicle Miles Traveled

At a program level of review, the project would have a significant VMT impact even after application of mitigation measure MM-TRANS-1 because it cannot be determined with certainty whether all future site-specific project level impacts could be reduced to below a level of significance. Although compliance with the Mobility Choices Ordinance is anticipated to result in the implementation of infrastructure improvements that could result in per capita VMT reductions, at a program level of analysis, it cannot be determined with certainty whether implementation of the required improvements would be implemented at the time a future development project's VMT impacts could occur and whether those improvements would reduce VMT impacts to below a level of significance. Additionally, not all types of development are subject to the Mobility Choices Regulations as detailed in SDMC Section 143.1102. Thus, impacts associated with residential, employment and retail VMT would remain significant after mitigation.

MM-TRANS-2 would further reduce potential VMT impacts associated with implementation of the Blueprint SD Initiative by requiring that future CPUs demonstrate that buildout of these CPUs would result in residential and nonresidential VMT levels that are below the City's CEQA Significance Determination Thresholds on a citywide basis, assuming implementation of the SANDAG Regional Plan. Implementation of this mitigation measure would ensure that future CPUs are developed consistent with the Blueprint SD Initiative's policy and land use framework and that future land use changes and associated growth would be directed into appropriate areas that would reduce citywide VMT and complement the mobility network in SANDAG's Regional Plan. Nevertheless, at a program level of analysis, it cannot be guaranteed that completion of all the SANDAG Regional Plan transportation investments will occur. Therefore, impacts associated with residential, employment and retail VMT would remain significant after mitigation.

#### 4.14.7.3 Design Feature

Impacts would be less than significant; no mitigation is required.

#### 4.14.7.4 Emergency Access

Impacts would be less than significant; no mitigation is required.

## 4.15 Tribal Cultural Resources

This section analyzes the potential for significant impacts to Tribal Cultural Resources that could result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (~~GPU~~) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC Land Development Code, and associated discretionary actions.

This section documents the tribal cultural background for the project areas and addresses potential impacts related to Tribal Cultural Resources. The analysis in this section is based in part on the following reports in addition to consultation with participating Tribes:

- Blueprint San Diego Cultural Resources Analysis prepared by Helix Environmental Planning (Appendix G)
- Cultural Resources Constraints and Sensitivity Analysis for the University Community Plan Update prepared by Red Tail Environmental (Appendix H-1)

### 4.15.1 Existing Conditions

#### 4.15.1.1 Tribal Cultural Resources

A Tribal Cultural Resource is defined as a site, feature, place, cultural landscape, sacred place, or object that is of cultural value to a Native American Tribe and is either on or eligible for listing on the California Register of Historical Resources or a local historic register, or which the lead agency, at its discretion, chooses to identify as a Tribal Cultural Resource (Public Resources Code [PRC] Section 21074).

#### 4.15.1.2 Tribal Cultural Context

##### a. Blueprint SD Initiative Context (citywide)

The following discussion is from the Blueprint SD Cultural Resources Analysis (see Appendix G).

Evidence for continuous human occupation in the San Diego region spans the last 10,000 years. Various attempts to parse out variability in archaeological assemblages over this broad time frame have led to the development of several cultural chronologies; some of these are based on geologic

time, most are based on temporal trends in archaeological assemblages, and others are interpretive reconstructions. Each of these reconstructions describes essentially similar trends in assemblage composition in more or less detail. This section employs a common set of generalized terms used to describe chronological trends in assemblage composition: Paleoindian (pre-7,450 Before Present [BP]), Archaic (7,450-1,450 BP), Late Prehistoric (450 BP–AD 1769), and Ethnohistoric (post-AD 1769). Before Present is defined as before 1950. It is important to note that Native American aboriginal lifeways did not cease at European contact. Protohistoric refers to the chronological trend of continued Native American Aboriginal lifeways at the cusp of the recorded historic period in the Americas.

The pre-contact cultural sequences are locally characterized by the material culture recovered during archaeological investigations as early as the 1920s, and through early accounts of Native American life in San Diego, recorded as a means to salvage scientific knowledge of native lifeways.

The prehistoric cultural sequence in San Diego County is generally described as comprising three basic periods: the Paleoindian, dated between about 11,500 and 8,500 BP and manifested by the artifacts of the San Dieguito Complex; the Archaic, lasting from about 8,500 to 1,500 BP (AD 500) and manifested by the cobble and core technology of the La Jollan Complex; and the Late Prehistoric, lasting from about 1,500 BP to historic contact (i.e., AD 500 to 1769) and represented by the Cuyamaca Complex. This latest complex is marked by the appearance of ceramics, small arrow points, and cremation burial practices.

## **b. Paleoindian Period**

The Paleoindian Period in San Diego County, which was situated at the terminal Pleistocene through Early Holocene geologic eras (circa 11,700 to 7,500 BP) is most closely associated with the San Dieguito Complex. Many archaeological sites attributed to the San Dieguito time frame are described as surface or very shallow deposits, typically located on inland knoll tops and ridge-fingers overlooking watercourses. The usually tenuous nature of these deposits, coupled with a limited range of tool types, has led many researchers to interpret San Dieguito sites as either temporary camps or loci of specialized activities, such as hunting or food processing. If these views are correct, then a San Dieguito economy, based primarily on hunting activities and secondarily on the use of plant resources, was probably expressed as a nomadic lifestyle that may have entailed seasonal patterns of movement dictated by the availability of local resources. The San Dieguito assemblage consists of well-made scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped points. The San Dieguito Complex is thought to represent an early emphasis on hunting.

## **c. Archaic Period**

The Archaic Period in coastal San Diego County is represented by the La Jollan Complex, a local manifestation of the widespread Millingstone Horizon. The La Jollan Complex spans the latter part of the Early Holocene, through the Middle Holocene, to the middle Late Holocene (circa 8,500 to 1,500 BP). This period brings an apparent shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. The local cultural manifestations of the Archaic Period are called the La Jollan Complex along the coast and the Pauma Complex



inland. Pauma Complex sites lack the shell that dominates many La Jollan sites. Along with an economic focus on gathering plant resources, the settlement system appears to have been more sedentary. Large deposits of marine shell at coastal sites argue for the importance of shellfish gathering to the coastal Archaic economy. Sites dating to the Archaic Period are numerous along the coast, near-coastal valleys, and around estuaries. In the inland areas of San Diego County, sites associated with the Archaic Period are less common relative to the Late Prehistoric complexes that follow them. The La Jolla/Pauma complex tool assemblage is dominated by rough cobble tools, especially choppers and scrapers. The La Jolla/Pauma complex tool assemblage also includes manos and metates; terrestrial and marine mammal remains; flexed burials; doughnut stones; discoidals; stone balls; plummets; biface points; beads; and bone tools.

#### **d. Late Prehistoric Period**

While there has been considerable debate about whether San Dieguito and La Jollan patterns might represent the same people using different environments and subsistence techniques, or whether they are separate cultural patterns, abrupt shifts in subsistence and new tool technologies occur at the onset of the Late Prehistoric Period (1,500 BP to AD 1769). This period coincides with the Late Holocene, dating after 3,500 BP. The Late Prehistoric period is represented by the San Luis Rey complex in the northern portion of San Diego County and the Cuyamaca complex in the southern portion of the county. Near the coast and in the Peninsular Mountains beginning approximately 1,500 years ago, patterns began to emerge, which suggest the ancestors of the ethnohistoric Kumeyaay occupied the area. This period is characterized by higher population densities and elaborations in social, political, and technological systems. Economic systems diversify and intensify during this period, with the continued elaboration of trade networks, the use of shell-bead currency, and the appearance of more labor-intensive but effective technological innovations. The late prehistoric archaeology of the San Diego coast and foothills is characterized by the Cuyamaca Complex. The Cuyamaca Complex is characterized by the presence of steatite arrowshaft straighteners, steatite pendants, steatite comales (heating stones), Tizon Brown Ware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic "Yuman bow pipes," ceramic rattles, miniature pottery, various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, mortars and pestles, and Desert Side-Notched (more common) and Cottonwood Series projectile points.

Based on ethnographic data, including the areas defined for the Hokan-based Yuman-speaking peoples (Kumeyaay) and the Takic-speaking peoples (Luiseño) at the time of contact, it is now generally accepted that the Cuyamaca complex is associated with the Kumeyaay and the San Luis Rey complex with the Luiseño. Agua Hedionda Creek is often described as the division between the territories of the Luiseño and the Kumeyaay people, although various archaeologists and ethnographers use slightly different boundaries.

#### **e. Ethnohistoric Period**

The Ethnohistoric Period commenced with the earliest European arrival in what is now San Diego and continued through the Spanish and Mexican periods and into the American period. Spanish colonists began to settle Alta California with the founding of Mission San Diego de Alcalá in AD 1769, within the territory of the Kumeyaay people. The Kumeyaay (also known as Kamia, *Ipai/Tipai*, and

Diegueño) occupied the southern two-thirds of San Diego County. The Kumeyaay lived in semi-sedentary, politically autonomous villages or rancherías. A settlement system typically consisted of two or more seasonal villages with temporary camps radiating away from these central places. Their economic system consisted of hunting and gathering, with a focus on small game, acorns, grass seeds, and other plant resources. The most basic social and economic unit was the patrilocal extended family. A wide range of tools was made of locally available and imported materials. A simple shoulder-height bow was used for hunting. Numerous other flaked-stone tools were made, including scrapers, choppers, flake-based cutting tools, and biface knives. Preferred stone types were locally available metavolcanics, quartzite, and quartz. Obsidian was imported from the deserts to the north and east. Ground stone objects include mortars and pestles typically made of locally available fine-grained granite. Both portable and bedrock types are known. The Kumeyaay constructed fine baskets. These employed either coiled or twined construction. The Kumeyaay also manufactured pottery, using the paddle-and-anvil technique. Most were a plain brown utility ware defined as Tizon Brown Ware. Decorated Tizon is known but is infrequent.

One difficulty with defining the Ethnohistoric Period is that influences from encroaching Spanish colonial forces undoubtedly reached northern groups, far in advance of the founding of Mission San Diego de Alcalá and Presidio de San Diego in AD 1769. For the local area the pace of cultural change accelerated after that date, and ultimately, the coming of the Spanish precipitated large-scale native depopulation, relocation, and social collapse of the aboriginal groups. This era also resulted in terminological confusion because Fray Junipero Serra, following standard practice, called the San Diego mission neophytes “Diegueños” and the Mission San Luis Rey de Francia neophytes “Luiseños.” These terms were extended to incorporate all natives within the holdings of each combined mission and Presidio administrative district, generally in complete ignorance of traditional sociopolitical divisions.

It is difficult to accurately reconstruct Aboriginal social and political structures because the Spanish recorded little information of value in this regard, and ethnographic field research began long after native cultures had experienced significant historical impacts. The Yuman speaking inhabitants throughout most of San Diego County were loosely organized into at least two dialectically separate groups, each associated with a geographic area that was home to many triplets or bands. The *Ipai* (northern) and *Tipai* (southern) divisions were not so much clearly defined territorial units as they were recognized, cultural and dialectical structures. In original usage, these terms probably had geographic and/or classificatory meanings that have since been lost or modified.

The Kumeyaay traditionally maintained a system of patrilineal, patrilocal, exogamous sibs that were distributed within a territorially associated band structure. Each band contained members of up to 15 sibs within its organization. The consanguineal kin group (household) was the primary social structure and consisted of a married couple together with their unmarried children, married sons and families, and such dependent relatives within the father’s lineage as his parents, grandparents, and unmarried aunts or uncles. At any one time, the Kumeyaay band usually maintained a main village and several outlying villages. Since the economy was based on intensive utilization of locally available natural resources, these settlements were more or less temporary. Residential units often split into their constituent clans when movement to other areas was necessitated either by seasonal changes or by local overexploitation. A “permanent” village, as recorded by early European explorers, probably consisted of an area that was regularly utilized by local band members for a

large part of the yearly cycle. At the time of Spanish intrusion, institutionalized leadership roles within the clans and various integrating systems between the clans facilitated flexible patterns of personnel movement and trade throughout the region. There were also various connections with the bands and clans of other ethnolinguistic traditions.

European contact substantially and pervasively stressed the social, political, and economic fabric of Kumeyaay culture. Missionary influence eroded traditional religious and ideological institutions, while Spanish development of coastal areas for crops and livestock severely impacted traditional subsistence practices. Disease, starvation, and a general institutional collapse caused emigration, birth rate declines, and high adult and infant mortality levels. For a short time and principally among inland groups, these pressures enhanced the role and increased the scope of interclan and possibly tribal level political institutions. However, continuing European encroachments eventually made traditional band level lifeways progressively unviable. A few impoverished bands were able to retain traditional patterns in remote mountain areas until the early twentieth century, but the broader and complex Kumeyaay social system was effectively dismantled by the mid-nineteenth century. The general collapse was so rapid and complete that most village locations and band, clan, or lineage names were never recorded.

The lack of Spanish colonial records notwithstanding, through a combination of ethnographic research, oral tradition, and archaeological investigations it is now understood that at the time of Spanish colonization in the late 1700s, several major villages, or rancherias, were located throughout coastal and riverine San Diego. Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego River provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. Along the San Diego River are at least three known village localities, including *Nipaguay* at the location of the San Diego Mission de Alcalá on the north side of the river; *Kosaii*, located at Old Town on the south side of the river; and the likely named Paulpa village at the mouth of the San Diego River in Ocean Beach. Other villages include *Milejo* and *Chiap* in the mouth of the Tijuana and Otay River Valleys, *Los Choyas*, along Chollas Creek, *Rinconada (Jamo)* along Rose Creek, and *Ystagua*, along Soledad Creek. The presence of significant sites along river courses and valley bottoms points to the importance of these physiographic features to native populations. Some native speakers referred to river valleys as *oon-ya*, meaning trail or road, describing one of the main routes linking the interior of San Diego with the coast.

### **4.15.1.3 University Community Plan Update Area Tribal Cultural Setting**

The following discussion is from the Cultural Resources Constraints and -Sensitivity Analysis for the University CPU (see Appendix H-1).

The village of *Ystagua* is significant to the University CPU area as it represents the closest of the documented *lipai* villages during the ethnohistoric period and is located adjacent to the eastern boundary of the University CPU area. The village site was a large central village and home of the Captain (*Kwaaypaay*) band. From *Ystaguai*, the *Kwaaypaay* oversaw all use of Torrey Pines Bluff, adjacent beaches and the coastal lagoon, and several satellite villages from the coast inland to Poway. The *Kwaaypaay* maintained control of Torrey Pines, a unique regional resource, and the

piners were maintained and protected from damage. *Ystagua* was an important center for trade and interaction throughout Southern California, and the *Kwayyapaay* maintained close relationships with the villages of Pamo and Mesa Grande, as well as coastal villages around San Diego, Mission Bay, and coastal locations within North San Diego County.

The village of *Ystagua* was a socio-economic hub for Southern California indigenous peoples. Coastal access for inland groups and access to foothill and mountain environments for coastal traders was made possible through Peñasquitos Creek, along the northern boundary of the University CPU area. The drainage not only provided a preferential access route between coastal and inland communities, but also ample natural resources for local inhabitants. As time passed, the same resources were eventually relied upon by the Spanish and, later, Mexican ranchers.

#### 4.15.1.4 Hillcrest Focused Plan Amendment Area Tribal Cultural Setting

The following discussion is from the Uptown CPU Final Program Environmental Impact Report (PEIR) (City of San Diego 2016).

Although no significant resources have been identified within the Hillcrest FPA area, significant resources ~~have been identified~~ are found in the vicinity of the Uptown Community Planning area. The Uptown CPU Final PEIR Program Environmental Impact Report identified one named Kumeyaay village in the vicinity of the community of Uptown, the village of Cosoy/Kosaii/Kosa'aay. Villages and campsites were generally located in areas where water was readily available, preferably on a year-round basis. The San Diego River, which is located approximately 0.5 mile from the Uptown Community Planning area, provided an important resource not only as a reliable source of water, but as a major transportation corridor through the region. Major coastal villages were known to have existed along the San Diego River, including the village of Cosoy/Kosaii/Kosa'aay near the mouth of the San Diego River. Although the actual location of the village is unknown, a site called Cosoy/Kosaii/Kosa'aay by the Native Americans was in the vicinity of Presidio Hill and Old Town, located less than one mile west of the Uptown Community Planning area boundary. Several investigations have identified possible locations for the village of Cosoy/Kosaii/Kosa'aay; however, the actual site has never been found. Several additional large villages have been documented along the San Diego River through ethnographic accounts and archaeological investigations in the area. These include *Nipaquay*, located near present-day Mission San Diego de Alcalá; El Corral, located near Mission Gorge; Santee Greens, located in eastern Santee; and El Capitan, located approximately 21 miles upstream of the Uptown Community Planning area, now covered by the El Capitan Reservoir (City of San Diego 2016).

### 4.15.2 Regulatory Setting

#### 4.15.2.1 Federal Regulations

See Section 4.4, Cultural Resources, for federal regulations pertaining to Tribal Cultural Resources.

## 4.15.2.2 State Regulations

See Section 4.4, Cultural Resources, for additional state regulations pertaining to Tribal Cultural Resources.

### a. Senate Bill 18

Signed into law in September 2004, and effective March 1, 2005, Senate Bill (SB) 18 permits California Native American Tribes recognized by the Native American Heritage Commission (NAHC) to hold conservation easements on terms mutually satisfactory to the Tribe and the landowner. The term “California Native American Tribe” is defined as “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.” The bill also requires that, prior to the adoption or amendment of a City or county’s general plan, the City or county shall consult with California Native American Tribes for the purpose of preserving specified places, features, and objects located within the City or county’s jurisdiction. SB 18 also applies to the adoption or amendment of specific plans. This bill requires the planning agency to refer to the California Native American Tribes specified by the NAHC and to provide them with opportunities for involvement.

### c. Assembly Bill 52

Assembly Bill (AB) 52, which created the new category of “Tribal Cultural Resources” that must be considered under the California Environmental Quality Act (CEQA), applies to all projects that file a notice of preparation or notice of negative declaration or mitigated negative declaration on or after July 1, 2015. AB 52 requires lead agencies to provide notice to and begin consultation with California Native American Tribes that are traditionally and culturally affiliated with the geographic area of a project if that Tribe has requested, in writing, to be kept informed of projects by the lead agency prior to the determination whether a negative declaration, mitigated negative declaration, or environmental impact report will be prepared. If a Tribe requests consultation within 30 days upon receipt of the notice, the lead agency must consult with the Tribe. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on Tribal Cultural Resources.

## 4.15.2.3 Local Regulations

See Section 4.4, Cultural Resources, for additional local regulations pertaining to Tribal Cultural Resources.

### a. General Plan Historic Preservation Element

The City’s General Plan Historic Preservation Element includes policies HP-A.1 through HP-A.5, which support the overall identification and preservation of historical resources. These policies address coordinated planning and preservation of Tribal Cultural Resources, and promoting the relationship with Kumeyaay/Diegueño Tribes. Policy HP-A.5e states that Native American monitors should be included during all phases of the investigation of archaeological resources; this would include surveys, testing, evaluations, data recovery phases, and construction monitoring. Recently adopted

community plan updates may also include additional community-specific policies related to Tribal Cultural Resources and Tribal consultation.

### **4.15.3 Significance Determination Thresholds**

Thresholds used to evaluate potential impacts related to Tribal Cultural Resources are based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:
  - a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k), or
  - b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.

#### **4.15.3.1 Sacred Lands File Search**

The NAHC was contacted on March 11, 2020 for a Sacred Lands File search and a list of Native American contacts for the University CPU area. On March 19, 2020, the NAHC responded with a positive result to the Sacred Lands File Search, in addition to providing a list of 16 Native American Tribes to contact for additional information on the Tribal Cultural Resources within the University CPU area. The NAHC was contacted on June 13, 2023, for a Sacred Lands File search and a list of Native American contacts for the Blueprint SD Initiative study area (i.e., citywide). On June 29, 2023, the NAHC responded with a positive result to the Sacred Lands File Search, in addition to providing a list of Native American Tribes who may have knowledge of the Tribal Cultural Resources within the Blueprint SD Initiative project area. The Kumeyaay are the identified Most Likely Descendants for all Native American human remains found in the City.



## 4.15.4 Impact Analysis

### Issue 1 Tribal Cultural Resources

*Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:*

- a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources, as defined in Public Resources Code Section 5020.1(k), or*
- b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.*

While much of the project areas have been developed, there is always a potential for encountering buried resources associated within the cultural territory that was utilized for over thousands of years by the Kumeyaay people. The potential for intact tribal cultural deposits at depth is probable at many locations where undocumented fill or alluvial deposition may mask buried resources, or in proximity to known recorded archaeological resources which can also be Tribal Cultural Resources as defined in CEQA (PRC-Public Resources Code Section 21074).

In an effort to determine the potential for Tribal Cultural Resources to be impacted as a result of project implementation, Native American Tribes were engaged. Tribal consultation in accordance with SB 18 was initiated by the City in July 2021 for both the Blueprint SD Initiative (including the Hillcrest FPA Focused Plan Amendment) and the University CPU. The City received responses from two Tribes. On July 23, 2021, Ray Teran from the Viejas Band of Kumeyaay Indians provided comments on the project. The City of San Diego responded to the correspondence from the Viejas Band of Kumeyaay Indians on July 26, 2021. On August 13, 2021, Dennen Pelton from the Rincon Band of Luiseno Indians provided a response to the notice identifying the project as being outside of the Band's specific Area of Historic Interest. On April 10, 2024, Daniel Tsosie, the cultural resource manager from the Campo Band of Mission Indians requested consultation under SB 18 for the Blueprint SD Initiative. A consultation meeting was scheduled with the Mr. Tsosie on April 23, 2024 but was cancelled by the tribal representative. The consultation meeting was rescheduled to May 1, 2024, in which Mr. Tsosie began consultation with City staff regarding the Cultural Resources Sensitivity Maps and associated mitigation measure. Consultation with Mr. Tsosie was concluded on May 15, 2024, and the City made note of the recommendations. Additional SB 18 notices will be sent 45 and 10 days prior to the City Council hearing on the project.

On November 3, 2023, the City delivered AB 52 notifications for the Blueprint SD Initiative, including the Hillcrest FPA and the University CPU, to the Iipay Nation of Santa Ysabel, the Jamul Indian Village, the San Pasqual Band of Diegueno Mission Indians, and the Campo Band of Diegueno Mission Indians. Subsequent emails were delivered on November 17, 2023, November 20, 2023, and January 26, 2024. No responses were received from three of the Tribes; One request for consultation was

received from Ms. Angelina Gutierrez from the San Pasqual Tribe of Mission Indians on November 6, 2023. The City responded to this request and contacted Ms. Gutierrez ~~seeking to schedule a meeting~~ on November 13, 2023, and December 7, 2023 ~~to attempt to schedule an AB 52 consultation meeting~~, but ~~has~~ have not received a response to date.

Similar to the analysis provided in Section 4.4, Issue 2, the Cultural Resources Sensitivity Maps would be reviewed to determine the potential for Tribal Cultural Resources to be impacted during construction associated with future development anticipated under the project. All development projects with the potential to affect historical resources, including Tribal Cultural Resources, would be required to comply with Implementation of the City's Historical Resources Regulations (San Diego Municipal Code [SDMC] Section 143.0201 et. seq.) and Historical Resources Guidelines which would require site-specific cultural surveys where warranted and implementation of measures to avoid or minimize impacts to the extent feasible.

In addition to compliance with the City's Historical Resources Regulations and Historical Resources Guidelines, future discretionary development within the project areas would be reviewed for consistency with the General Plan's Historic Element policies, including policies HP-A.2 through HP-A.4, which address formal consultation with Native American Tribes, the inclusion of Native American monitors during archaeological resources investigations, the consideration of historical and cultural resources early in the development review process, and the treatment of Native American human remains.

Individual community plans also contain policies addressing Tribal Cultural Resources, and future discretionary projects would ~~also~~ be reviewed for consistency with the applicable Community Plan policies. Within the University CPU area, future discretionary development with the potential to impact Tribal Cultural Resources would be reviewed for consistency with the University CPU's Historic Preservation Policies including the following: Policy 6.1A, which directs the City to conduct project-specific Native American consultation early in the discretionary development review process to ensure culturally appropriate and adequate treatment and mitigation for significant archaeological sites with cultural or religious significance to the Native American community in accordance with all applicable local, state, and federal regulations and guidelines; Policy 6.4~~2~~2A, which directs the City to conduct project-specific investigations in accordance with all applicable laws and regulations to identify potentially significant tribal cultural and archaeological resources; and Policy 6.2~~3~~3A, which calls for ensuring adequate data recovery and mitigation for adverse impacts to archaeological and Native American sites as part of development, including measures to monitor and recover buried deposits from the tribal cultural, archaeological and historic periods, under the supervision of a qualified archaeologist and a Native American Kumeyaay monitor.

Within the Hillcrest FPA area, future discretionary development with the potential to impact Tribal Cultural Resources would be reviewed for consistency with the Uptown Community Plan's Historic Preservation policies including Policy HP-2.10, which directs the City to conduct project-specific Native American consultation early in the development review process to ensure adequate treatment and mitigation for significant archaeological sites or sites with cultural and religious significance to the Native American community in accordance with all applicable local, state and federal regulations and guidelines; and Policy HP-2.1~~1~~, which directs the City to consider eligible for listing on the City's Historical Resources Register any significant archaeological or Native American

cultural sites that may be identified as part of future development within Uptown, and refer the site to the Historical Resources Board for designation, as appropriate.

While adherence to the existing regulations, General Plan and Community Plan policies, and any project-specific mitigation would provide for the protection of Tribal Cultural Resources, at a program level of review it cannot be ensured that all potential impacts to Tribal Cultural Resources would be fully avoided or minimized. Pursuant to SDMC Section 143.0260, a potential deviation from the City's Historical Resources Regulations may be considered if a proposed development cannot to the maximum extent feasible comply with the regulations so long as the decision maker makes the applicable findings in SDMC Section 126.0504. Given the potential that future development could request deviations under the Historical Resources Regulations, it cannot be ensured that all impacts to Tribal Cultural Resources would be avoided or minimized. Mitigation Measure MM-HIST-2, as described in Section 4.4.6.2, Cultural Resources, is provided to address potential impacts to Tribal Cultural Resources. Nevertheless, potential impacts to Tribal Cultural Resources would be significant.

## Cumulative Impacts

The City's Historical Resources Regulations and Historical Resources Guidelines, combined with federal, state, and local regulations, provide a regulatory framework for ensuring that Tribal Cultural Resources are evaluated and mitigation measures or standard conditions are applied during project-level reviews. The City's process for evaluating discretionary projects includes environmental review and documentation pursuant to CEQA as well as an analysis of those projects for consistency with the goals, policies, and recommendations of the General Plan and applicable Community Plan. Development in accordance with the project would largely be located within existing developed and urban locations that have been subject to some degree of ground disturbance, which would limit the potential for significant, previously undiscovered resources to be encountered, but does not eliminate the possibility for further impacts. Nevertheless, future development in accordance with the project may contribute to incremental tribal cultural resource impacts. Adherence to the existing regulatory and policy framework and implementation of the mitigation framework would reduce impacts to Tribal Cultural Resources. However, as the degree of future impacts and the applicability, feasibility, and success of future mitigation measures cannot be adequately known for each specific future project at this program level of analysis, the cumulative impact on Tribal Cultural Resources would be significant.

### 4.15.5 Significance of Impacts

While compliance with existing regulations including the City's Historical Resources Regulations, Historical Resources Guidelines, and tribal consultation requirements, and implementation of applicable General Plan and Community Plan policies would provide for the protection of Tribal Cultural Resources and would minimize potential impacts, it is not possible to ensure the successful preservation of all Tribal Cultural Resources at a program level of review. Pursuant to SDMC Section 143.0260, a potential deviation from the City's Historical Resources Regulations may be considered if a proposed development cannot to the maximum extent feasible comply with the regulations so long as the decision maker makes the applicable findings in SDMC Section 126.0504. Given the potential that future development could request deviations under the Historical Resources

Regulations, it cannot be ensured that all impacts to Tribal Cultural Resources would be avoided or minimized. Therefore, potential impacts to Tribal Cultural Resources would be significant.

### **4.15.6 Mitigation, Monitoring, and Reporting**

Refer to Section 4.4.6.2, MM-HIST-2 for mitigation that would address potential Tribal Cultural Resources impacts associated with future discretionary development projects.

### **4.15.7 Significance after Mitigation**

Future discretionary development anticipated as a result of the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would result in potentially significant impacts to Tribal Cultural Resources, and therefore, would be required to implement MM-HIST-2 (see Section 4.4.6.2). MM-HIST-2 includes measures to minimize impacts to Tribal Cultural Resources. This mitigation, combined with the policies of the General Plan and applicable Community Plan policies promoting the identification, protection, and preservation of Tribal Cultural Resources, in addition to compliance with CEQA and Public Resources Code PRC Section 21080.3.1 requiring tribal consultation early in the development review process, and the City's Historical Resources Regulations, which require review of all development projects which have the potential to impact historical resources~~discretionary construction or development permit applications for any parcel identified as sensitive on the Cultural Resources Sensitivity Maps~~, would reduce the program-level impact related to Tribal Cultural Resources. However, even with application of the existing regulatory, policy, and mitigation frameworks, at a program level of review it cannot be ensured that all potential impacts to Tribal Cultural Resources would be fully avoided or minimized. Furthermore, pursuant to SDMC Section 143.0260, a potential deviation from the City's Historical Resources Regulations may be considered if a proposed development cannot to the maximum extent feasible comply with the regulations so long as the decision maker makes the applicable findings in SDMC Section 126.0504. Thus, impacts to Tribal Cultural Resources would remain significant.

## 4.16 Utilities and Service Systems

This section analyzes the potential for significant impacts as it relates to utilities and service systems that could result from implementation of the following key project components:

- “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (~~CPU~~) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

Issues addressed in this section include utilities, water supply, sewer, stormwater, water distribution facilities, communication systems, and solid waste systems. The analysis in this section is partially based on the Water Supply Assessment (WSA) prepared for the Hillcrest FPA and University CPU. Appendix L-1 includes the City’s request for a WSA for the Hillcrest FPA dated October 10, 2023, Appendix L-2 is the January 2024 WSA for the Hillcrest FPA prepared by the City’s Public Utilities Department (PUD), Appendix M-1 is the City’s request for a WSA for the University CPU dated July 14, 2023, and Appendix M-2 is the August 2023 WSA for the University CPU prepared by PUD.

### 4.16.1 Existing Conditions

#### 4.16.1.1 Water Supply

##### a. Metropolitan Water District

The Metropolitan Water District (MWD) is southern California’s wholesale water provider. The MWD service area is approximately 5,200 square miles and includes the counties of Los Angeles, Orange, Riverside, San Bernardino, San Diego, and Ventura. There are 26 member agencies of the MWD, including 14 cities and 11 municipal water districts, and the San Diego County Water Authority (SDCWA). MWD owns and operates the Colorado River Aqueduct, and the Colorado River is one of their two main water sources. Under the priority system that governs the distribution of Colorado River water made available to California, MWD holds the fourth priority right of 550,000 acre-feet per year (AFY; City of San Diego 2020).

MWD’s second major water source is the State Water Project (SWP), owned by the State of California and operated by the Department of Water Resources (DWR). The SWP’s supply originates in northern California with water captured from the Feather River Watershed behind Lake Oroville Dam. MWD is the largest, in terms of population served, of the 29 agencies that have long-term contracts for water service from DWR. MWD’s contract with DWR provides for the ultimate delivery

of 1,911,400 million acre-foot, which is 46 percent of the total SWP entitlement (City of San Diego 2020).

MWD's existing water supplies have been historically sufficient to meet demands within its service area during years of normal precipitation, and while it manages reserve supplies to account for normal drought conditions, regulatory actions have placed limitations on its ability to provide water to its member agencies. Future population growth, regulatory restrictions, increased competition for low-cost water supplies, and other factors such as climate change could impact MWD's ability to supply its member agencies even in normal years.

## **b. San Diego County Water Authority**

The SDCWA is one of the member agencies of the MWD. SDCWA is the countywide wholesaler and is made up of 24 public member agencies stretching from the United States-Mexico border to the Orange County and Riverside County borders. SDCWA owns and operates five large-diameter pipelines to deliver imported water to its member agencies. SDCWA has embarked on a multi-year Emergency Storage Plan to provide up to six months of emergency water supplies in the event of a system failure or other issue with receiving imported water from the MWD (SDCWA 2021).

In November 2012, SDCWA's Board of Directors approved a 30-year Water Purchase Agreement with Poseidon Resources, a private investor-owned company, to purchase water from the proposed Carlsbad Desalination Plant. The plant and conveyance pipeline were completed in 2015 and, as of 2018, meet approximately 10 percent of the region's water demand (SDCWA 2021).

The SDCWA has encouraged the development of local water supply projects, such as water recycling and groundwater projects, through the award of Local Water Supply Development incentives. Over \$55 million in SDCWA incentive funding has been awarded to program participants. In fiscal year 2020, the Water Authority provided local agencies with \$3 million in Local Water Supply Development Program incentives for agencies with existing executed agreements for recycled water projects (SDCWA 2021).

The water supply to the University CPU area is supplied via the City's Miramar Water Treatment Plant which receives water from the SDCWA aqueduct system as well as through the impoundment of local runoff (Dudek 2020). The Uptown Community Plan area, where the Hillcrest FPA area is located, is served by existing six-inch- to 36-inch-diameter public water mains located in a grid pattern within the connecting streets. Water is distributed to businesses and residences through private water lines that connect to the public water main.

## **c. City of San Diego Public Utilities Department**

The City's PUD is one of the public member agencies of the SDCWA and serves a population of approximately over 1.4 million, which is expected to increase about one percent annually over the next 25 years. The PUD's water system extends over approximately 400 square miles and includes both potable and recycled water facilities. The City's water system has nine reservoirs (commonly referred to as City lakes), two water reclamation plants, three water treatment plants, and 29 treated



water storage facilities. The City's water system is split into three major service areas: Miramar, Alvarado, and Otay. The City's PUD provides water to the City through an existing water system.

#### **d. Surface Water**

The City's PUD maintains and operates nine reservoirs that capture surface water runoff from rainfall within local watersheds. These nine reservoirs provide approximately 13 percent of the City's total water supply. In the San Diego region, local precipitation produces surface runoff to streams that contribute to these reservoirs. A portion of this runoff is used for the municipal water supply, while the remainder evaporates during reservoir storage. Most of the runoff to reservoirs is produced in years with much greater than average rainfall. As with the local climate, average rainfall is about the minimum required to saturate the soils sufficiently for significant surface runoff (City of San Diego 2022).

The use of local surface water is also affected by water resource management policies. PUD's policy is to use local water first to reduce imported water purchases and costs. PUD also operates emergency and seasonal storage programs in conjunction with its policy. The purpose of emergency storage is to maintain an accessible amount of stored water that could provide an uninterrupted supply of water to the City's water treatment facilities, should an interruption to the supply of imported water occur. The purpose of seasonal storage is to store surplus imported water in the wet winter season for use during the dry summer season. In the winter, PUD may increase the use of imported water so that the local water may be saved in reservoirs or groundwater basins for summer use (City of San Diego 2022).

#### **e. Recycled Water**

While PUD has historically imported nearly all of its water from the SDCWA, it also strives for more local surface water, recycled water, and conservation efforts to meet or offset potable demands. Recycled water is wastewater that has undergone additional treatment to make it suitable for a range of beneficial uses. Recycled water in the City is produced by two water reclamation plants: the North City Water Reclamation Plant (NCWRP) and the South Bay Water Reclamation Plant (City of San Diego 2020).

The City's Pure Water San Diego Program (Pure Water) was approved by the City of San Diego City Council (City Council) in 2014 and is intended to provide a reliable drinking water supply that is locally controlled and drought-proof. The Pure Water Program is a phased, multi-year program. Based on water use projections developed in 2020, the Pure Water Program will provide nearly one-half of San Diego's water supply locally by 2035 (City of San Diego 2021). Phase 1 of the Pure Water Program is currently underway and includes the construction of the Morena Northern Pipelines and Tunnels, the expansion of the NCWRP, and the construction of the NCWRP Flow Equalization Basin and North City Pure Water Facility and Pump Station projects in the University CPU area (City of San Diego 2023).

## f. Conservation

In 1985, the City Council adopted the Water Conservation Program to address water scarcity concerns. Over the past 30 years, the City has achieved substantial water savings by:

- Developing innovative, customer-oriented water conservation programs;
- Creating policies and ordinances designed to promote and mandate water conservation; and
- Implementing comprehensive public information and education campaigns that foster behavior change and a shared water conservation ethic.

On May 31, 2018, Governor Brown signed Senate Bill (SB) 606 and Assembly Bill (AB) 1668 which build on ongoing efforts to “make water conservation a California way of life.” The bills emphasize efficient water use as the most cost-effective way to achieve long term water conservation goals, as well as evaluating water supply reliability relative to longer and more intense droughts caused by climate change in California. The MWD and its member agencies continue to work toward achieving water savings consistent with AB 1668 standards for efficient water use, as well as the SB 606 urban water use objective (City of San Diego 2020).

### 4.16.1.2 Utility Infrastructure

#### a. Water Distribution

The City’s PUD treats and delivers a current average of approximately 175,000 AFY of water to approximately 1.4 million residents. The water system extends over approximately 400 square miles, including approximately 340 square miles in the City. PUDs’ potable water system serves the City and certain surrounding areas, including both retail and wholesale customers. The project areas are all located within PUD’s water service area. To offset potable (drinking) water demands, the City owns and operates two water reclamation plants and a recycled water distribution system that delivers recycled water for non-potable water uses. The City’s three water treatment plants—Alvarado, Miramar and Otay—provide safe and reliable drinking water and have a combined permitted total capacity of approximately 378 million gallons per day (gpd). To distribute potable water produced at these water treatment plants, PUD maintains and operates numerous water pump stations within over 130 pressure zones (within the City’s retail service area), and numerous treated water storage facilities with more than approximately 200 million gallons of potable water capacity (Appendix K~~L~~-1).

#### b. Sewer

The City’s PUD provides wastewater collection, treatment, reclamation, and disposal services to the City through its Metropolitan Sewerage System. The Metropolitan Sewerage System treats wastewater for approximately 450 square miles and approximately 2.2 million people. The service area includes the City of San Diego, including the Hillcrest FPA area and University CPU area, and 15 other cities and districts. The system treats an average of approximately 180 million ~~gallons per~~ gpd of wastewater. The majority of sewer flows generated within the University CPU area are conveyed outside of the community boundary via the University of California, San Diego and Miramar Trunk Sewers, which are eventually conveyed via the Rose Canyon Trunk Sewer. Outside of

the community boundary, sewer flows continue to the North Metro Interceptor, eventually reaching the Point Loma Wastewater Treatment Plant. In addition to these flows, a portion of the sewer flows within the University CPU area are also conveyed to the NCWRP. Reclaimed water produced at the NCWRP is distributed throughout the northern part of the City via an extensive reclaimed water pipeline system. Distribution pipelines are installed within the University CPU area to provide reclaimed water for irrigation, landscaping, and industrial use (Dudek 2020).

### **c. Stormwater Infrastructure**

The City's stormwater system is maintained by the City's Stormwater Department. It consists of drainage and conveyance facilities such as underground storm drainpipes, culverts, outfalls, pump stations, open flood risk management channels, and more. This infrastructure collects and conveys stormwater and other runoff downstream. Storm drains are designed to handle normal water flow, but occasionally during heavy rain flooding will occur.

The City's Stormwater Department is responsible for the inspection, maintenance, and repair of the City's storm drain system in the public right-of-way and in drainage easements. In addition, other City departments, such as the Parks and Recreation Department or PUD, may also have the responsibility and jurisdiction to maintain the drainage systems within their own facilities.

Stormwater runoff originating throughout the City and specifically in the Hillcrest FPA area and the University CPU area is conveyed in a variety of directions through streets, gutters, cross gutters, gullies, open channels, and storm drain systems. In the University CPU area, the majority of the storm drain network can be found in the southern portion of the community, where residential drainage structures are conveyed to larger storm mains which contribute stormwater to Rose Canyon and San Clemente Canyon (River Focus 2020).

### **d. Electric Power and Natural Gas**

San Diego Gas & Electric (SDG&E) is the owner and operator of electricity transmission, distribution, and natural gas distribution infrastructure in San Diego County, and currently provides gas and electric services to the project areas. SDG&E is regulated by the California Public Utilities Commission. The California Public Utilities Commission sets the gas and electricity rates for SDG&E and is responsible for making sure that California utilities customers have safe and reliable utility service at reasonable rates, protecting utilities customers from fraud, and promoting the health of California's economy.

SDG&E supplies customers with electricity generated both locally and outside of the utility's service territory, with local facilities currently capable of generating a total of approximately 3,100 megawatts of power. SDG&E owns and contracts with generation facilities both within and outside its service territory, and power is also produced in local facilities that are non-utility owned (SDG&E 2021).

Natural gas is imported into the San Diego region by pipeline after being produced at any of several major supply basins located from Texas to Alberta, Canada. Although the San Diego region has access to all of these basins by interstate pipeline, the final delivery into the SDG&E system is

dependent on just one Southern California Gas Company pipeline that enters San Diego County from Orange County located along Interstate 5.

Natural gas consumption by sector varies somewhat each year. In general, power plants account for the highest percentage of natural gas consumption in the San Diego region. Residential consumption of natural gas for heating and cooking is the second highest percentage, followed by cogeneration, commercial and industrial consumption, and natural gas fueled vehicles.

## **e. Communications Systems**

Communications systems for telephones, computers, and cable television are serviced by utility providers such as AT&T, Cox, Spectrum (formerly Time Warner), and other independent cable companies. In addition, television services are available from the two satellite services, Direct TV and Dish. Facilities are located above and below ground within private easements. In recent years, the City has initiated programs to promote economic development through the development of high-tech infrastructure and integrated information systems. The City also works with service providers to underground overhead wires, cables, conductors, and other structures associated with communication systems in residential areas in accordance with the City's Municipal Code (SDMC). Individual development projects consisting of more than four lots are subject to SDMC Section 144.0240, which requires privately owned utility systems and service facilities to be placed underground.

### **4.16.1.3 Solid Waste**

The City's Environmental Services Department manages residential solid waste disposal for eligible residences in the project areas pursuant to SDMC Section 66.0101 et seq. Refuse not eligible for the City's collection services is collected by privately operated franchised haulers. Waste generated in the City is taken primarily to three landfills: West Miramar Sanitary Landfill, Sycamore Landfill, and Otay Landfill. The West Miramar Landfill is located within the City and is permitted to receive a maximum of 8,000 tons of waste per day. Remaining capacity as of 2020 was approximately 11 million cubic yards. As of 2023, the landfill's estimated cease operation date was determined to be 2031 (California Department of Resources Recycling and Recovery [CalRecycle] 2023).

The Sycamore Landfill is operated by Republic Services and is located within the City. The facility is permitted to receive maximum of 5,000 tons of waste per day. As of 2016, remaining capacity at this landfill was estimated to be nearly 114 million cubic yards. As of 2023, the landfill's estimated cease operation date was determined to be 2042 (CalRecycle 2023).

The Otay Landfill is located within an unincorporated area within the City of Chula Vista and is also operated by Republic Services. The facility is permitted to receive a maximum of 6,700 tons of waste per day. As of 2016, remaining capacity at this landfill was estimated to be approximately 21 million cubic yards. As of 2023, the landfill's estimated cease operation date was determined to be 2030 (CalRecycle 2023).

## **4.16.2 Regulatory Setting**

### **4.16.2.1 Federal Regulations**

#### **a. Safe Drinking Water Act**

The Safe Drinking Water Act (SDWA), passed by Congress in 1974, authorizes the federal government to set national standards for drinking water. These National Primary Drinking Water Regulations protect against both naturally occurring and man-made contaminants. The SDWA sets enforceable maximum contaminant levels for drinking water and all water providers in the United States, excluding private wells serving fewer than 25 people, must treat water to remove contaminants.

The 1986 amendments to the SDWA and the 1987 amendments to the Clean Water Act (CWA) established the U.S. Environmental Protection Agency (USEPA) as the primary authority for water programs throughout the country. The USEPA is the federal agency responsible for providing clean and safe surface water, groundwater, and drinking water, and protecting and restoring aquatic ecosystems. USEPA Region 9 (Pacific Southwest) includes Arizona, California, Hawaii, Nevada, the Pacific Islands (Northern Marianas, Guam, and American Samoa), and a minimum of 148 Tribal Nations located within Arizona, California, and Nevada.

#### **b. Clean Water Act**

The CWA (33 United States Code Section 1251 et seq.; 1972) is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. The CWA established basic guidelines for regulating discharges of pollutants into waters of the United States and requires that states adopt water quality standards to protect public health, enhance the quality of water resources, and ensure implementation of the CWA.

Section 401 of the CWA requires that any applicant for a federal permit to conduct any activity, including the construction or operation of a facility that may result in the discharge of any pollutant, must obtain certification from the state. Section 402 of the CWA established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources. The CWA was amended in 1987 to address urban runoff. One requirement of the amendment was the obligation for municipalities to obtain NPDES permits for discharges of urban runoff from their municipal separate storm sewer systems (MS4s).

### **4.16.2.2 State Regulations**

#### **a. California Department of Public Health Drinking Water Program**

The California Department of Public Health Drinking Water Program conducts most enforcement activities related to water providers abiding by maximum contaminant levels set by the SDWA. If a water system does not meet standards, it is the water supplier's responsibility to notify its customers. The Drinking Water Program is within the Division of Drinking Water and Environmental

Management, and San Diego County falls under the Southern California Field Operation Branch in Region V, District 14. The Drinking Water Program is also responsible for the following tasks:

- Regulating public water systems;
- Certifying drinking water treatment and distribution operators;
- Supporting and promoting water system security;
- Providing support for small water systems and for improving technical, managerial, and financial capacity; and
- Providing funding opportunities for water system improvements.

## **b. Department of Water Resources**

The California DWR was established in 1956 and is responsible for the operation and maintenance of the California SWP. DWR is also responsible for the following:

- Overseeing the statewide process of developing and updating the California Water Plan (Bulletin 160 series);
- Protecting and restoring the Sacramento–San Joaquin Delta;
- Regulating dams, providing flood protection, and assisting in emergency management;
- Educating the public about the importance of water and its proper use; and
- Providing technical assistance to service local water needs.

## **c. Senate Bills 221 and 610**

SB 221 requires water suppliers to prepare written verification that sufficient water supplies are available prior to approval of a large-scale subdivision of land under the State Subdivision Map Act. Large-scale projects include residential developments with more than 500 units, shopping centers or businesses employing more than 1,000 people, shopping centers or businesses having more than 500,000 square feet of floor space, commercial office buildings employing more than 1,000 people, and/or commercial buildings having more than 250,000 square feet of floor space or occupying more than 40 acres of land. SB 610 requires water suppliers to prepare a WSA report for inclusion by land use agencies during the California Environmental Quality Act (CEQA) process for new developments that are subject to SB 221. SB 221 and SB 610 went into effect in January of 2002 to improve the link between information on water availability and land use decisions made by cities and counties.

## **d. Water Conservation Act of 2009**

The Water Conservation Act of 2009 was enacted by the California legislature as SB 7 of the 7th Special Legislative Session (SB X7-7) to institute a new set of urban water conservation requirements known as “20 Percent by 2020.” These requirements stipulate that urban water agencies must reduce per capita water use within their service areas by 20 percent relative to their use over the previous 10 to 15 years.



### **e. State Water Resources Control Board and Regional Water Quality Control Board**

In California, the State Water Resources Control Board (SWRCB) and Regional Water Quality Control Boards (RWQCBs) administer the NPDES permitting programs and are responsible for developing waste discharge requirements. The local RWQCB is responsible for developing waste discharge requirements specific to its jurisdiction. General waste discharge requirements that may apply to projects include the SWRCB Construction General Permit, Industrial General Permit, and the Regional MS4 Permit Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and R9-2015-0100, administered by the San Diego RWQCB.

### **f. California Integrated Waste Management Act of 1989**

The California Integrated Waste Management Act of 1989 (AB 939) was enacted to reduce, recycle, and reuse solid waste generated in the state to the maximum extent feasible primarily through source reduction, recycling, and composting activities, and by requiring the participation of the residential, commercial, industrial, and public sectors to reduce solid waste from landfill disposal.

### **g. Assembly Bill 341**

In 2011, in response to AB 939, the State of California enacted AB 341, which established a policy goal of a 75 percent reduction of solid waste by 2020 and annually thereafter through recycling, composting, or source reduction. AB 341 requires that commercial enterprises that generate four cubic yards or more of solid waste weekly and multi-family dwellings of five units or more arrange for recycling services.

### **h. Assembly Bill 1668**

AB 1668 requires the SWRCB, in coordination with the DWR, to adopt water efficiency standards and regulations; drought and water shortage contingency plan guidance; specified standards for per capita daily indoor residential water use; and performance measures for commercial, industrial, and institutional water use. The legislation also specifies penalties on local water suppliers for violations to these standards. Starting in 2027, local water suppliers' failure to comply with the Board's adopted long-term standards could result in fines of \$1,000 per day during non-drought years, and \$10,000 per day during declared drought emergencies and certain dry years.

### **i. Senate Bill 606**

SB 606 requires an urban retail water supplier to calculate an urban water use objective no later than November 1, 2023, and by November 1 every year thereafter, and its actual urban water use by those same dates.

### **4.16.2.3 Regional Regulations**

#### **a. MWD 2020 Regional Urban Water Management Plan**

The MWD's Urban Water Management Plan (UWMP) describes and evaluates sources of water supply, efficient uses of water, demand management measures, implementation strategies and schedules, and other relevant information and programs. The UWMP is updated every five years, and information from the MWD's UWMP is used by local water suppliers in the preparation of their own plans. The information included in the MWD's UWMP represents the district's most current planning projections of demand and supply capability developed through a collaborative process with the member agencies. The MWD's UWMP does not explicitly discuss specific activities undertaken, which is the role of MWD's Integrated Water Resources Plan. The 2020 MWD UWMP found that within the MWD's service area, retail water demands can be met with local or imported supplies.

#### **b. MWD 2020 Integrated Water Resources Plan**

The MWD's Integrated Water Resources Plan is a blueprint for long-term water supply reliability in southern California. The fundamental goal of the plan is for southern California to continue to have a reliable water system, considering future challenges related to prolonged droughts and changing climate.

#### **c. SDCWA 2020 Urban Water Management Plan**

The SDCWA developed its 2020 UWMP in coordination with its 24 member agencies. The main components of the UWMP include the following: baseline demand forecasts under normal weather, dry weather and climate change scenarios; conservation savings estimates and net water demand projections; a water supply assessment; supply reliability analysis; and scenario planning. SDCWA's 2020 UWMP estimates that future water demands in 2045 are projected to reach approximately 630,771 acre feet, which represents a 36 percent increase from 2020 demands.

#### **d. Regional MS4 Permit**

The San Diego RWQCB is responsible for permitting, compliance, and other activities to reduce pollutants in municipal, construction, and industrial stormwater runoff. The Storm Water Management Unit of the San Diego RWQCB also provides important assistance in dispersing state grant funds to worthy projects that support activities for the reduction and prevention of stormwater pollution. As a co-permittee for the Regional MS4 permit under the NPDES and the CWA (see State Regulations above), the City must implement several stormwater management programs, including those designed to control stormwater and other discharges from new development and redevelopment.

The San Diego RWQCB regulates discharges from Phase I MS4s in the San Diego region under the Regional MS4 Permit. The Regional MS4 Permit covers 39 municipal, county government, and special district entities located in San Diego County, southern Orange County, and southwestern Riverside County who own and operate large MS4s which discharge stormwater (wet weather) runoff and

non-stormwater (dry weather) runoff to surface waters throughout the San Diego region. The Regional MS4 Permit, Order No. R9-2013-0001, was adopted on May 8, 2013 and initially covered the San Diego County co-permittees. Order No. R9-2015-0001 was adopted on February 11, 2015, and amended the Regional MS4 Permit to extend coverage to the Orange County co-permittees. Finally, Order No. R9-2015-0100 was adopted on November 18, 2015, and amended the Regional MS4 Permit to extend coverage to the Riverside County co-permittees. The Regional MS4 Permit expired on June 27, 2018 but remains in effect under an administrative extension until it is reissued by the San Diego RWQCB. The San Diego Water Board has begun the development of proposed changes to the Regional MS4 Permit and will hold public workshops on focus topics and proposed changes.

The Regional MS4 Permit requires that all jurisdictions within the San Diego region prepare Jurisdictional Runoff Management Plans outlining strategies and processes a jurisdiction will implement to reduce the discharge of pollutants from its storm drain system to the maximum extent practicable. Each of these plans must contain a component addressing construction activities and a component addressing existing development.

#### **4.16.2.4 Local Regulations**

##### **a. City of San Diego General Plan**

The **Public Facilities, Services, and Safety Element** presents goals and policies related to wastewater, stormwater infrastructure, waste management, and public utilities. Overall goals include providing environmentally sound collection, treatment, re-use, disposal, and monitoring of wastewater; increase the use of reclaimed water to supplement the region's limited water supply; protection of beneficial water resources through pollution prevention and interception efforts, implementation of a stormwater conveyance system that effectively reduces pollutants in urban runoff and stormwater to the maximum extent practicable; providing efficient, economical, environmentally-sound waste collection, management, and disposal, achieving maximum diversion of materials from disposal through the reduction, reuse, and recycling of wastes to the highest and best use; providing public utility services in the most cost-effective and environmentally sensitive way, and ensuring that public utilities sufficiently meet existing and future demand with facilities and maintenance practices that are sensible, efficient, and well-integrated into the natural and urban landscape.

The **Conservation Element** addresses the management, preservation, and utilization of natural resources. The Conservation Element works together with the Public Facilities, Services, and Safety Element to provide policies on facility infrastructure and the management of resources such as water and energy. Overall goals include preparing for, adapting to, and thriving in a changing climate and being an international model of sustainable development and conservation including water conservation. Specific policies include CE-A.5 encourages the employment of sustainable or "green" building techniques for the construction and operation of buildings and CE-A.11 which encourages implementation of sustainable landscape design and maintenance specifically implementing water conservation measures in site/building design and landscaping. CE-D.1 encourages the implementation of a balanced, water conservation strategy as an effective way to manage demand by: reducing dependence on imported water supplies; maximizing the efficiency of existing urban

water and agricultural supplies through conservation measures/programs; and developing alternative, reliable sources to sustain present and future water needs.

## **b. City of San Diego City Council Policies**

Council Policy 400-04 outlines the City's Emergency Water Storage Program. The policy mandates that PUD store sufficient water in active, available storage to meet 7.2 months (six-tenths of the annual) of normal City water demand requirements, excluding conservation. Active, available storage is defined as the portion of water that is above the lowest usable outlet of each reservoir.

Council Policy 400-13 identifies the need to provide maintenance access to all sewers to reduce the potential for spills. This policy requires that environmental impacts from access paths in environmentally sensitive areas should be minimized through the use of sensitive design, canyon-proficient maintenance vehicles, and plans that dictate routine and preventative maintenance and emergency access procedures.

Council Policy 400-14 outlines a program to evaluate the potential to redirect sewage flow out of canyons and environmentally sensitive areas to an existing or proposed sewer facility located in City streets or other accessible locations. This policy requires both a physical evaluation and a cost-benefit analysis. If redirection of flow outside the canyon is found infeasible, a Long-Term Maintenance and Emergency Access Plan specific to the canyon evaluated would be required. The plan would prescribe long-term access locations for routine maintenance and emergency repairs, along with standard operating procedures identifying cleaning methods and inspection frequency.

Council Policy 600-43 establishes a set of guidelines for the review and processing of applications for the placement and design of wireless communication facilities in accordance with the City's land use regulations. These guidelines are intended to prescribe clear, reasonable, and predictable criteria to assess applications in a consistent and expeditious manner, while reducing visual and land use impacts associated with the construction of new wireless communication facilities. For applicants seeking the placement of a wireless communication facility on City-owned land, this policy should be used in conjunction with applicable Council policies and SDMC Section 141.0420.

Council Policy 800-04 assigns maintenance of stormwater conveyance facilities located on private land to those private landowners, absolving the City of responsibility.

Council Policy 800-14 establishes a prioritization process for Capital Improvement Program (CIP) projects. Prior to inclusion in the CIP budget, the following prioritization factors are to be considered: risk to health, safety, and environment and regulatory or mandated requirements; existing conditions, potential annual cost, and longevity; benefit towards under-served communities and economic prosperity; improvement on level and quality of service; sustainability and conservation; funding availability; project readiness; and multiple category benefit. Following inclusion into the CIP budget, the CIP Review and Advisory Committee utilizes a more detailed scoring methodology in the planning and pre-design, design, and construction phases of an infrastructure project to ensure an up-to-date and accurate assessment of the feasibility, cost, and environmental impact and mitigation.

### **c. City of San Diego Municipal Code**

The SDMC contains a number of ordinances regulating public utilities. These include permitting and requirements for public sewer connections and wastewater facilities, construction waste diversion, recycling for City-serviced properties and residential properties, controlling non-stormwater discharges, stormwater runoff, and drainage from development projects.

### **d. City of San Diego Water Facility Design Guidelines**

The City's Water Facility Design Guidelines identify general planning, predesign, and design details that provide uniformity in key concepts, equipment types, and construction materials for facilities being built. These design guidelines assist in providing professionally sound, efficient, uniform, and workable facilities – whether pipelines, pressure control facilities, pumping stations, or storage facilities.

### **e. Long-Range Water Resources Plan**

The City's 2012 Long-Range Water Resources Plan is a high-level strategy document that evaluates water supply and demand objectives against multiple planning objectives. The 2012 Long-Range Water Resources Plan was a stakeholder-driven process that evaluated over 20 water supply options such as water conservation, recycled water, groundwater storage, brackish groundwater desalination, rainwater harvesting, graywater, and potable reuse. The plan takes a long-range viewpoint through the year 2035, addressing risks and the uncertainty of future water supply conditions.

### **f. City of San Diego Urban Water Management Plan**

The City's UWMP, adopted by the City Council in June 2021, is the planning document used by water suppliers to meet the standards set forth in SB 610 and SB 221. The UWMP addresses the City's water system and includes a description of the water supply sources, magnitudes of historical and projected water use, and a comparison of water supply to water demands during normal, single-dry, and multiple-dry years. The UWMP serves as a long-range planning document for the City's water supply.

### **g. Jurisdictional Runoff Management Plan**

The City's Jurisdictional Runoff Management Plan provides a total account of how the City plans to protect and improve the water quality of rivers, bays, and the ocean in the region in compliance with the Regional MS4 Permit. The document describes how the City incorporates stormwater best management practices (BMPs) into land use planning, development review and permitting, City CIP project planning and design, and the execution of construction contracts. See also Section 4.9, Hydrology of this Program Environmental Impact Report (PEIR).

## **h. Storm Water Management and Discharge Control Ordinance**

As a co-permittee under the Regional MS4 Permit issued by the San Diego RWQCB, the City must implement stormwater management programs, including programs designed to control stormwater discharges from development projects during construction and on a permanent postconstruction basis. The City's Storm Water Management and Discharge Control Ordinance addresses these requirements by requiring construction measures and permanent post-construction BMPs for development projects.

## **i. Watershed Asset Management Program**

The City's Stormwater Department has prepared the Watershed Asset Management Plan to identify the broad investments required to maintain the City's stormwater management system. The plan is consistent with the City's general asset management practices and addresses both flood risk management and stormwater quality. The plan incorporates the strategies identified in the City's Comprehensive Load Reduction Plans as a foundation for meeting the requirements and compliance standards of the Regional MS4 Permit issued by the RWQCB on May 8, 2013.

## **j. City of San Diego Stormwater Standards Manual**

The City's Stormwater Standards Manual (City of San Diego 2018) provides information to project applicants on how to comply with the permanent and construction stormwater quality requirements in the City. The Stormwater Standards Manual is contained in Appendix O of the City's Land Development Manual and is organized in three key parts:

Part 1: BMP Design Manual - For Permanent Site Design, Stormwater Treatment and Hydromodification Management

Part 2: Construction BMP Standards

Part 3: Offsite Stormwater Alternative Compliance Program for Water Quality and Hydromodification Control

Part 1 of the Stormwater Standards Manual, the BMP Design Manual, addresses and provides guidance for complying with on-site post-construction stormwater requirements for Standard Projects and Priority Development Projects, and provides procedures for planning, preliminary design, selection, and design of permanent stormwater BMPs based on the performance standards presented in the MS4 Permit.

Part 2 of the Stormwater Standards Manual addresses stormwater impacts and required controls associated with construction activities in the City. The purpose of these standards is to provide guidance to prevent construction activities from adversely impacting downstream and on-site resources through appropriate planning, installation, and maintenance of BMPs. The construction BMP standards provide guidance on providing the appropriate BMPs to prevent discharges of pollutants associated with construction activity.



Part 3 of the Stormwater Standards Manual addresses the Offsite Stormwater Alternative Compliance Program (Offsite Alternative Compliance Program) developed by the City to allow mitigation of Priority Development Projects' stormwater impacts through implementation of off-site structural BMPs. The program allows for offsite control of water quality and hydromodification impacts, provides design options and flexibility in the case of site infeasibility, and provides the potential for more effective regional storm water control solutions to improve watershed scale water quality.

## **k. City of San Diego Municipal Waterways Maintenance Plan**

The City is responsible for maintaining the City's storm drain system which conveys runoff from local neighborhoods to the Pacific Ocean. The City's Municipal Waterways Maintenance Plan guides the maintenance of the storm drain system, which includes activities such as, but not limited to, removal of accumulated sediment, vegetation and trash that impedes water flow and increases flood risks, repair and maintenance of City stormwater infrastructure, and construction of mitigation sites to provide mitigation for impacts to stormwater infrastructure. This plan efficiently provides public safety through a pro-active and responsive maintenance schedule that minimizes and mitigates effects on the environment and streamlines subsequent authorizations.

## **l. City of San Diego Sewer Design Guide**

The City's Sewer Design Guide sets forth criteria to be used for the design of sewer systems, which may consist of pump stations, gravity sewers, force mains, and related appurtenances. The guide includes criteria for determining pump station, gravity sewer, and force main capacity and sizing; alignment of gravity sewers and force mains; estimating wastewater flow rates; designing bridge crossings; and corrosion control requirements.

## **m. City of San Diego Climate Action Plan**

The City's Climate Action Plan (CAP) is the City's policy commitment to set clear goals to reduce greenhouse gas emissions. The 2022 CAP aims to achieve net zero greenhouse gas emissions by 2035 and has identified six equity-focused strategies to achieve this goal:

- Strategy 1: Decarbonization of the Built Environment
- Strategy 2: Access to Clean and Renewable Energy
- Strategy 3: Mobility and Land Use
- Strategy 4: Circular Economy and Clean Communities
- Strategy 5: Resilient Infrastructure and Healthy Ecosystems
- Strategy 6: Emerging Climate Actions

Key measures related to water and wastewater include Measure 4.5 to support capture of methane from wastewater treatment plants and Measure 5.3 to increase local water supply and reduce water dependence.

## n. Wireless Communications Facilities Guidelines

The SDMC defines Wireless Communication Facilities as the antennas, support structures, and other equipment or apparatus necessary for providing personal wireless services and information services. SDMC Section 141.0420 regulates wireless communications facilities, as well as the City's Wireless Communications Facilities Guidelines, which provides guidelines to minimize visual impacts from the installation of wireless communications facilities in accordance with the City's General Plan.

### 4.16.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to utilities and infrastructure are based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?
- 2) Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?
- 3) Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?
- 4) Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

### 4.16.4 Impact Analysis

#### Issue 1 New or Expanded Utilities

*Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment, or stormwater drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects?*

Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are planning level actions that will facilitate future development across the City and within the Hillcrest FPA Area and University CPU area; however, no specific development is proposed at this time. As future development is proposed consistent with these planning documents, specific project features would need to be evaluated to determine if new or expanded utilities and associated infrastructure are required. At a program level of review, implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would guide future development in appropriate locations, including

supporting increased opportunities for higher residential and commercial density within the Climate Smart Village Areas, which are primarily areas with a village propensity value between 7 and 14 (see Figure 3-1). To implement the Blueprint SD Initiative, it is anticipated that ~~CPUs~~community plan updates, Specific Plans, ~~FPA~~focused plan amendments, and LDC amendments would be proposed in the future to support development in the Climate Smart Village Areas. Implementation of the Hillcrest FPA would increase the allowable residential and commercial development intensity within approximately 380 acres of the Hillcrest and Medical Complex neighborhoods supporting additional homes and jobs in close proximity to transit to maximize sustainable transportation options. At buildout, the University CPU would result in an overall community-wide increase of approximately ~~36,800,000~~40,582,000 square feet of planned non-residential floor area and approximately ~~29,000~~30,480 additional planned residential units compared to existing conditions. As future development is implemented consistent with the ~~Village Climate Goal Propensity Map~~Blueprint SD Initiative, the University CPU and Hillcrest FPA, each individual project would be required to evaluate the physical impacts of development, including impacts associated with new or expanded utilities. At a project level of review, physical impacts would be minimized through required compliance with the City's Environmentally Sensitive Lands (ESL) Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City. While it is expected that individual future development projects would be able to reduce the impacts associated with providing new or expanded utilities with compliance with the City's regulatory framework, at a program level of review, these impacts ~~are considered~~would be significant due to the project's expected increase in demand for additional utilities resulting from anticipated development.

### a. Stormwater

As discussed in Section 4.9, Hydrology, and Section 4.17, Water Quality, future development projects throughout the project areas would have the potential to result in urban runoff and associated pollutant discharges. However, as development occurs, it is likely that the volume and rate of runoff could be decreased through the City's compliance with the Regional MS4 Permit, Stormwater Standards Manual, Jurisdictional Runoff Management Plan, and SDMC requirements for stormwater management (collectively referred to as the "City Stormwater Regulations"). As new development occurs, implementation of Low Impact Development BMP practices that help retain stormwater on-site for infiltration, re-use, or evaporation would be required per the City's Stormwater Standards Manual.

Future development occurring under the project could result in a need for the installation of new stormwater infrastructure. The need for new stormwater infrastructure would depend on the condition of existing infrastructure, development patterns, and development standards. The City assesses the condition of its stormwater facilities on a continuous basis. Additionally, per Council Policy 800-14, the City's CIP ~~program~~ has established a scoring methodology to prioritize funding for infrastructure projects, including the construction of new stormwater infrastructure.

All future projects would be required to adhere to the SDMC, including conformance with the City Stormwater Regulations in place at the time future development is proposed. As future development is implemented at the project-level, consistent with the ~~Village Climate Goal Propensity Map~~Blueprint SD Initiative, the University CPU, and Hillcrest FPA, each individual project would be

required to evaluate the physical impacts of development, including impacts associated with new or expanded stormwater facilities. At a project level of review, physical impacts would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City. While it is expected that individual future development projects would be able to reduce potential impacts with compliance with the City's regulatory framework, at a program level of review, and without project-specific development plans, potential physical impacts and the extent of impacts associated with the future construction of stormwater facilities required to support future projects would be significant.

### **b. Sewer**

Sewer line upgrades are administered by the City's Engineering & Capital Projects (E&CP) Department and are handled on a project-by-project basis. No new sewer collection or wastewater treatment facilities are proposed in conjunction with the project. Likewise, the location and extent of future facilities would not be established until such time that individual projects are proposed. Future development would be required to follow the City's Sewer Design Guide and to comply with SDMC Chapter 6, Article 4 regulations regarding sewer and wastewater facilities. As future development is implemented at the project-level, consistent with the ~~Village Climate Goal Propensity Map~~ Blueprint SD Initiative, the University CPU and Hillcrest FPA, each individual project would be required to evaluate the physical impacts of development, including impacts associated with new or expanded sewer facilities. At a project level of review, physical impacts would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City. While it is expected that individual future development projects would be able to reduce the potential impacts associated with providing new or expanded sewer facilities with compliance with the City's regulatory framework, at a program level of review, and without project-specific development plans, potential physical impacts and the extent of these impacts associated with potential sewer facility upgrades required to support future projects are unknown. Therefore, impacts would be significant.

### **c. Water Distribution Facilities**

No new water distribution or treatment facilities are proposed in conjunction with the proposed project; however, Phase 1 of the City's Pure Water Program is in progress and includes two projects that pass through the University CPU area, and address the need to increase the sizing of existing pipelines and mains. The potable water distribution system is continually upgraded and repaired on an ongoing basis through the City's CIP. These improvements are determined based on continuous monitoring by the E&CP's Engineering Division to determine remaining levels of capacity. The E&CP's Engineering Division plans its CIP projects several years prior to pipelines reaching capacity. Such improvements are required of the water system regardless of implementation of the proposed project. As future development is implemented at the project-level, consistent with the ~~Village Climate Goal Propensity Map~~ Blueprint SD Initiative, the University CPU and Hillcrest FPA, each individual project would be required to evaluate the physical impacts of development, including impacts associated with new or expanded water distribution facilities. At a project level of review, physical impacts would be minimized through required compliance with the City's ESL Regulations,

Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City. While it is expected that individual future development projects would be able to reduce the potential impacts associated with providing new water distribution facilities with compliance with the City's regulatory framework, at a program level of review, and without project-specific development plans, potential physical impacts and the extent of these impacts associated with future improvements to water lines are unknown. Therefore, impacts would be significant.

#### **d. Electric Power and Natural Gas**

New development occurring under the project may result in the need for new electric and natural gas transmission lines; however, no specific upgrades are proposed, and the location and extent of future development is not known at this time. Future project-level review for the development of electric and natural gas transmission lines would be required. ~~Further, per the City's CAP (Strategy 1: Decarbonization of the Built Environment), the City is actively engaging with stakeholders to develop a Building Code Amendment that will take a step beyond the 2021 California Energy Commission's unanimous approval of amendments to the state building code for the removal of natural gas in new construction. As future development is implemented at the project-level, consistent with the Village Climate Goal Propensity Map Blueprint SD Initiative,~~ the University CPU and Hillcrest FPA, each individual project would be required to evaluate the physical impacts of development, including impacts associated with the installation of new electric or natural gas utilities. At a project level of review, physical impacts would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City. While it is expected that individual future development projects would be able to reduce potential impacts with compliance with the City's regulatory framework, at a program level of review, potential physical impacts and the extent of these impacts associated with the construction of electric and natural gas transmission lines required to support future projects are unknown, since the location of specific future development cannot be determined at this time. Therefore, impacts to electric power and natural gas would be significant.

#### **e. Communications Systems**

New development occurring under the project may result in the need for new communications systems; however, no specific systems upgrades are proposed, and the location and extent of future facilities is not known at this time. Future siting of communications infrastructure would be in accordance with SDMC Section 141.0420, which regulates wireless communications facilities, as well as the City's Wireless Communications Facilities Guidelines, which provides guidelines to minimize visual impacts from the installation of wireless communications facilities in accordance with the City's General Plan. Project-level review for future communication systems would be required. Potential impacts associated with future site-specific development would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City. While it is expected that individual future development projects would be able to reduce potential impacts associated with the provision of new communications systems with compliance with the City's regulatory framework, at a program level of review, potential physical

impacts and the extent of these impacts associated with the future construction of communication systems required to support future projects are unknown, since the location of specific future development cannot be determined at this time. Therefore, impacts to communications systems would be significant.

## Issue 2 Sufficient Water Supplies

*Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?*

Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are planning level actions that anticipate both future plan amendments, LDC amendments, and future development; however, no specific development is proposed at this time. As future development is proposed consistent with these planning documents, specific project features would need to be evaluated to determine if sufficient water supplies are available to the project.

WSAs were prepared for the University CPU (see Appendix M-2) and the Hillcrest FPA (Appendix L-2) to assess whether sufficient water supplies are, or will be, available to meet the projected water demands of the proposed land use changes. The WSAs included, among other information, identification of existing water supply entitlements, water rights, water service contracts, or agreements relevant to the identified water supply for the community plan areas; and quantities of water received in prior years pursuant to those entitlement, rights, contracts, and agreements. The WSA evaluated water supplies that are, or will be, available during a normal, single-dry year, and multiple-dry year (20-year) period, to meet the estimated demands of the changes proposed in the CPUs compared to the existing land use plans. The WSAs demonstrate that there are sufficient water supplies over a 20-year planning horizon to meet the projected demands of the University CPU and the Hillcrest FPA, as well as the existing and other planned development projects within the PUD service area in normal, dry, and multiple-dry year forecasts. Additional discussion of the WSA results is provided in the subsections below.

### a. Blueprint SD Initiative

Future CPUs, specific plans, and FPAs are anticipated to align with the City's land use framework as defined by the Village Climate Goal Propensity map, focusing future opportunities for homes and jobs within the Climate Smart Village Areas. The additional development density and intensity throughout the City could result in additional demand on water supply. Due to the Village Climate Goal Propensity map being a framework for growth, with specific land use changes anticipated to occur in the future, a WSA addressing citywide growth consistent with the Village Climate Goal Propensity map was not conducted. As future CPUs, specific plans, and/or focused plan amendments are proposed, these would be accompanied by WSAs to evaluate the availability of water. The City's ongoing updates to the UWMP on a five-year cycle allow the City to appropriately plan for water demands of planned land uses as specific Community Plans are updated to reflect additional opportunities for growth. While implementation of the Blueprint SD Initiative is anticipated to increase demand for water, the five-year annual updates to the City's UWMP would ensure ongoing planning for water supplies is conducted that accounts for future growth and changing drought conditions.



Furthermore, if individual developments are proposed that trigger the requirement for a WSA including residential developments with more than 500 units and other large scale projects (see Section 4.16.2.2c), PUD would evaluate the availability of water supplies during normal, single-dry years, and multiple-dry water years during a 20-year projection to determine if it meets the projected demands of the project in addition to the existing and planned future water demands of PUD. As WSAs are prepared for future Community Plan updates, specific plans, and focused plan amendments proposed for consistency with the Village Climate Goal Propensity map and the Blueprint SD Initiative, the water demands of planned development would be incorporated into water supply projections. Additionally, the anticipated growth under the Blueprint SD Initiative would support efficient use of water due to growth anticipated to be multi-family or mixed-use residential development that would have higher densities and intensities proportional to their village propensity values. Higher density development requires less potable water demand than lower density, single-family residential due to reduced demand for water use in landscaping. Therefore, the growth framework for the Blueprint SD Initiative is supportive of residential water efficiency. Additionally, adherence to the City's policy and regulatory framework would facilitate water efficient site design and infrastructure as part of future development.

Existing regulations would also ensure water efficient fixtures are installed with new development. The California Green Building Standards Code requires a 20 percent reduction in indoor water use relative to specified baseline levels. SDMC Section 67.0601, Water Submeters, was adopted in April 2010 to encourage water conservation in multi-family residential and mixed-use buildings by requiring the use of water submeters for each individual residential unit. Billing individual residential units based on the actual amount of water consumed in the unit creates a financial incentive for residents of multi-family residential units to conserve water.

While the project anticipates densities in excess of what would have been considered in the latest water supply planning document, the preparation of a WSA to account for all future development consistent with the Village Climate Goal Propensity map would not be feasible at this time because it is not known with certainty where and how much density will be ultimately proposed under future plan amendments or future development consistent with the Village Climate Goal Propensity map. A WSA that estimates water supplies needed to serve maximum buildout of the Village Climate Goal Propensity Map would be considered speculative at this time. As future CPUs, Specific Plans, or other FPA~~focused plan amendments~~ are proposed consistent with the Blueprint SD Initiative Village Climate Goal Propensity map, WSAs would be prepared to evaluate the availability of water supply, which would ensure that the water demands of planned or proposed development are incorporated into water supply projections. Impacts resulting from implementation of the Blueprint SD Initiative would be less than significant.

## **b. Hillcrest Focused Plan Amendment**

As detailed in Appendix L-1, the City requested a WSA based on the projected residential and non-residential build-out projections for the FPA area. SANDAG Series 14 forecasts were used to estimate existing and future 2045 population, employment, and future residential and non-residential development. Conservatively, the projected community buildout with the project was estimated at 54,500 residential units (just above the 52,818 units reported in Table 3-1) and 8,318,700 square feet of non-residential space (consistent with Table 3-1). As detailed in Appendix L-1, the City assumes

that approximately 400 homes would be constructed annually from 2020 to 2045. Based on these assumptions, the City estimates that approximately 33,183 units could be constructed by 2045, with the remaining units occurring beyond 2050. Since the projections used for the WSA are based on a 20 year planning horizon, the estimated residential growth of approximately 33,183 dwelling units by 2045 was used for preparation of the WSA. This represents a reasonable assumption of growth over the planning horizon. For non-residential space, the City estimates approximately 8,318,700 square feet of non-residential buildout, which could be built by 2045. This would be approximately 1,168,800 more square feet than existing which is attributable to the proposed expansion of the University of California, San Diego and Scripps Medical Centers.

As detailed in Appendix L-2, the City's estimated build-out projections for the existing Uptown Community Plan are based on the 2020 UWMP. The WSA estimates the Hillcrest FPA would add approximately 3,002 multi-family homes and approximately 1,037,600 square-feet institutional/medical facilities to the Uptown Community by 2045.

The Hillcrest FPA WSA found that the proposed water demand projections for the Hillcrest FPA are included in the regional water resource planning documents of the City and the Water Authority. Current and future water supplies, as well as actions necessary to develop future water supplies, have been identified. This WSA demonstrates that there will be sufficient water supplies available during normal, single-dry, and multiple-dry water years over a 20-year projection to meet the demands of the project. The projected 2045 water demand of the WSA is 578,781 gallons per day (gpd), or 648.3 AFY. Water demands for the Hillcrest FPA assume all mandatory water efficiency standards are met and result in more water efficient buildings and landscapes as compared to older developments. Per State law, the UWMP is required to be updated every five years; therefore, future development that could occur from 2045 to 2050 (the proposed CPU's planning horizon) would be accounted for in the next UWMP update. Based on the results of the Hillcrest FPA WSA, implementation of the Hillcrest FPA would result in less than significant impacts related to water supply.

### **c. University Community Plan Amendment**

As detailed in Appendix M-1, the City requested a WSA based on the projected residential and non-residential build-out projections for the University CPU area. SANDAG Series 14 forecasts were used to estimate existing and future 2045 population, employment, and future residential and non-residential development. The projected University CPU buildout from Appendix M-1, is conservatively estimated at 57,000 residential units and 99,900,000 square feet of non-residential floor area (just above the 99,867,000-square feet reported in Table 3-4). As detailed in Appendix M-1, the City assumes that approximately 800 homes would be constructed annually from 2020 to 2045. By 2045, including the 2020 Series 14 forecast estimate, the total number of homes is projected to reach 48,000. Due to the WSA estimating water use over a 20-year planning horizon, the University WSA assumes 48,000 new residential units would be constructed over the planning horizon, including 5,000 single-family units and 43,000 multi-family units (Appendix M-2)

Regarding non-residential growth the University CPU WSA anticipates approximately 69,486,000 square feet of nonresidential buildout over the planning horizon, which is based on a growth assumption of approximately 1,000,000 square feet per year through 2045. As detailed in Appendix

M-2 the University CPU WSA found that the proposed water demand projections are included in the regional water resource planning documents of the City and the Water Authority. Current and future water supplies, as well as actions necessary to develop future water supplies, have been identified. This WSA demonstrates that there will be sufficient water supplies available during normal, single-dry, and multiple-dry water years over a 20-year projection to meet the demands of the CPU. The WSA finds that there is sufficient water planned to supply the CPU's estimated annual average usage. The projected water demand of the University CPU is approximately 3,424,425 ~~gpd~~ gallons per day (GPD), or 3,835 AFY. Water demands for the CPU assume all mandatory water efficiency standards are met and result in more water efficient buildings and landscapes as compared to older developments. The 2020 UWMP establishes that the five Pressure Zones: La Jolla Gardens, North City 2, North City 3, Northwest Mesa, and Torrey Pines serve the University CPU area have a planned net capacity of 10,201 AFY in 2050. Therefore, the City has adequate capacity to serve the projected water demand of the University CPU with the combined planned pressure zone capacity. As detailed in Appendix M-2, there are sufficient water supplies to support the anticipated growth within the University CPU area considering normal and drought conditions. Per State law, the UWMP is required to be updated every five years; therefore, future development that could occur from 2045 to 2050 (the proposed CPU's planning horizon) would be accounted for in the next UWMP update. Therefore, impacts related to water supply would be less than significant.

### Issue 3 Adequate Wastewater Capacity

*Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

No new sewer collection or wastewater treatment facilities are proposed in conjunction with the project. However, implementation of the Blueprint SD Initiative, the University CPU and Hillcrest FPA would allow for increased intensity of development that could increase demand on public sewer systems. Upgrades to sewer lines are an ongoing process. These upgrades are administered by the City's E&CP Department and are handled on a project-by-project basis. As project implementation would likely result in an increase in demand for wastewater capacity, there may be a need to increase the sizing of existing pipelines and mains for wastewater. Wastewater treatment facilities may also require upgrades. PUD infrastructure planning includes long range infrastructure planning and upgrades in anticipation of future growth. Due to the project identifying appropriate locations for growth in response to SANDAG growth projections, existing and ongoing PUD planning would capture the anticipated wastewater demand from the project.

All future sewer facilities would be required to comply with the SDMC regulations regarding sewers and wastewater facilities (SDMC Chapter 6, Article 4, Division 4), the City's Sewer Design Guidelines, and PUD's Capital Improvement Program Guidelines and Standards, and would be subject to review at the time design plans are available that would ensure adequate capacity exists to serve future development. Potential impacts associated with the provision of future sewer facilities would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City. While wastewater treatment capacity is likely to be addressed by PUD long range planning and infrastructure improvements, future project level

evaluation of wastewater capacity would be required as future development is proposed. As site-specific information regarding the specific demands of future projects in relation to available wastewater capacity to serve development cannot be known at a program level of review, impacts would be ~~considered~~ significant.

## Issue 4 Solid Waste

*Would the project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

The CalRecycle provides estimates of solid waste generation rates for different types of land uses. These rates estimate the amount of solid waste created by residences or businesses over a specified amount of time. Waste generation rates include all materials discarded, whether or not they are later recycled or disposed of in a landfill, because under state law the total amount of waste “generated” is considered to be the sum of the waste “disposed of” plus the waste “diverted” from disposal. Waste generation rates can be used to estimate the impact of new development on local solid waste infrastructure. However, it should be noted that impacts to solid waste infrastructure are not necessarily the amount of waste generated, but whether any increase would require the development of new facilities. Since the majority of waste is managed through waste diversion, solid waste facilities include those necessary to provide composting, recycling, and other collection, separation, and diversion services.

Future projects developed under the project would be required to comply with applicable SDMC regulations related to recycling (SDMC Sections 66.0702 through 66.0718) in addition to requirements for the recycling of construction and demolition debris specified in the City's Construction and Demolition Debris Diversion Deposit Program Ordinance (Sections 66.0601 through 66.0610 of the SDMC).

SDMC Section 66.0604 sets the following construction and demolition recycling requirements for all Building Permits or Demolition/Removal Permits issued by the City (Development Services Department Information Bulletin 710):

- (a) All applicants for a Building Permit or a Demolition/Removal Permit, including the City of San Diego, shall submit a properly completed Waste Management Form Part I with the Building Permit or Demolition/Removal Permit application, in accordance with the requirements set forth in the Land Development Manual; and
- (b) All applicants, including the City of San Diego, shall pay a refundable deposit at the time the Building Permit or Demolition/Removal Permit is issued; and
- (c) No Building Permit or Demolition/Removal Permit shall be issued unless the applicant has submitted a properly completed Waste Management Form Part I and paid the required deposit.

All future development proposed under the project would be required to comply with SDMC Section 142.0801 et seq., which outlines the requirements for refuse and recyclable materials storage that would ensure sufficient project-specific interior and exterior storage space for refuse and recyclable

materials is included in the project design. Adherence to these regulations would help the City meet its recycling and waste reduction goals as established by the City and mandated by the State of California and would further conserve the capacity of the landfill as solid waste materials would be diverted to the appropriate recycling or organic waste facility. The City is also in the process of expanding its Organics Processing Facility on the Miramar Landfill to continue meeting the City's organics diversion processing needs.

The General Plan addresses waste management in Policies PF-I.1 through PF-I.5, focusing on waste recycling and diversion of materials in PF-I.2. Future projects' conformance with these policies would help the City meet a 75 percent recycling target as required under AB 341. Additionally, the City has adopted a Zero Waste Plan, which aims to achieve 70 percent waste diversion by 2020, 90 percent waste diversion by 2035, and 100 percent diversion by 2040. The City's CAP also includes policies supporting zero waste. Through mandatory compliance with the SDMC regulations related to solid waste, all new development projects would continue to reduce solid waste generation and increase recycling efforts.

Through compliance with existing policies and regulations, impacts associated with solid waste management would be less than significant.

## **Cumulative Impacts**

### **a. Utilities**

Mandatory compliance with City standards for the design, construction, and operation of storm water, water distribution, wastewater, electric power, natural gas, and communications systems infrastructure and required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures, would ensure significant cumulative physical impacts related to the provision of utilities would be avoided. Physical impacts associated with the relocation or construction of new or expanded storm water, water distribution, wastewater, electric power, natural gas, and communication systems infrastructure would typically be localized and would not combine to create a significant cumulative impact. Therefore, cumulative impacts would be less than significant.

### **b. Water Supply**

Water supply planning inherently considers the cumulative supply and demand for water in the region. According to WSAs prepared for the University CPU and Hillcrest FPA, water supply is adequate to supply projected development in these areas. Implementation of Blueprint SD Initiative and the associated Village Climate Goal Propensity Map (see Figure 3-1) would facilitate development that is focused within Climate Smart Village Areas. Increased intensity of residential and commercial development would increase demands for water that is not accounted for in existing water supply planning documents. However, as future CPUs, specific plans, or other focused plan amendments are proposed consistent with the Village Climate Goal Propensity map, WSAs would be prepared to evaluate the availability of water supply, which would ensure that the water demands of planned or proposed development are incorporated into water supply projections.

Furthermore, the City's five year updates to the UWMP provides for ongoing water supply planning for projected growth in the region. Therefore, cumulative impacts would be less than significant.

### **c. Adequate Wastewater Capacity**

Mandatory compliance with the SDMC regulations, the City's Sewer Design Guidelines, and PUD's Capital Improvement Program Guidelines and Standards at the time future project specific development is proposed, as well as any additional project-specific mitigation measures, would ensure adequate wastewater capacity is available at the time development is proposed. Additionally, PUD wastewater capacity planning is conducted on an ongoing basis to ensure cumulative demand on wastewater facilities and capacity is available to support anticipated growth. Despite planning level efforts to ensure adequate wastewater capacity, at this level of programmatic review and without the benefit of project-specific development plans, cumulative impacts associated with adequate wastewater capacity would be significant.

### **d. Solid Waste**

Future development in accordance with the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region. All future projects would be required to comply with City regulations regarding solid waste, including those intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with existing regulations requiring waste diversion would help preserve solid waste capacity. Additionally, citywide efforts to reach zero waste goals would support landfill diversion and minimize demand on landfill capacity. Therefore, cumulative impacts associated with solid waste would be less than significant.

## **4.16.5 Significance of Impacts**

### **4.16.5.1 Utilities**

Mandatory compliance with City standards for the design, construction, and operation of storm water, water distribution, wastewater, electric power, natural gas, and communications systems infrastructure would likely minimize significant environmental impacts associated with the future construction of and/or improvements to utility infrastructure. At a project level of review, future development would consider the physical impacts of utility improvements and physical impacts would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures. However, at this programmatic level of review and without the benefit of project-specific development plans, impacts associated with the construction of storm-water, water distribution, wastewater, electric power, natural gas, and communication systems would be significant.



### 4.16.5.2 Water Supply

Impacts related to implementation of the Blueprint SD Initiative would be less than significant because this planning initiative plans for anticipated growth with a focus on increasing by focusing development densities and intensities within Climate Smart Village Area, and prioritizing higher density multi-family and mixed-use development which is more water efficient than single family land uses. At the time specific land use changes are proposed, WSAs would be prepared to evaluate and document the availability of water supply over the planning horizon. Providing WSA projections based on build-out assumptions for the Blueprint SD Initiative would be speculative at this time as the land use changes have not occurred and water demand assumptions are based on more refined analysis of actual growth projections. As discussed under Issue 2, the water use assumptions for the Hillcrest FPA and University CPU are based on annual growth assumptions to provide a reasonable estimate of actual water demand. According to WSAs prepared for the University CPU and Hillcrest FPA, there would be adequate water supply in a normal, single-dry year, and multiple-dry year (20-year) period, to meet the estimated water demands within these communities through 2045, the water supply planning horizon. Therefore, water supply impacts related to the project would be less than significant.

### 4.16.5.3 Adequate Wastewater Capacity

No new sewer collection or wastewater treatment facilities are proposed in conjunction with the proposed project. However, implementation of the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA would allow for increased intensity of development that could increase demand on public sewer systems.

As site-specific information regarding future demand and available wastewater capacity to serve development anticipated by the proposed project is not known at a program level of review, impacts would be significant.

Mandatory compliance with the SDMC regulations, the City's Sewer Design Guidelines, and PUD's Capital Improvement Program Guidelines and Standards would ensure future development is required to demonstrate adequate wastewater facilities and capacity is available to serve the project, or that appropriate infrastructure improvements are constructed concurrent with development to ensure adequate capacity. At a project level of review, physical impacts would be avoided or minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures. However, at this programmatic level of review and without project-specific development plans, potential impacts associated with increased demand on sewer infrastructure and wastewater capacity would be significant.

### 4.16.5.4 Solid Waste

Future development within the project areas would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region. However, future projects would be required to comply with City regulations regarding solid waste that are intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with existing regulations requiring waste diversion would help

preserve solid waste capacity. Therefore, impacts associated with solid waste would be less than significant.

## 4.16.6 Mitigation, Monitoring, and Reporting

### 4.16.5.1 Utilities

At a program level of review, impacts related to new or expanded utilities would be significant. As future development is implemented at the project-level consistent with the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA, each individual project would be required to evaluate the physical impacts of development including all utility improvements. At a project level of review, physical impacts associated with the installation of utility infrastructure would be minimized through required compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City. ~~Feasible mitigation that may be implemented at the project level related to physical impacts that may result from installation of utilities is described in Chapter 9.0.~~ While it is expected that individual future development projects would be able to reduce physical impacts associated with providing utility infrastructure, at a program level of review and without specific development plans available, it cannot be ensured that all impacts would be mitigated to a less than significant level. Thus, impacts would be significant. No feasible mitigation measures are available at this time as the specific impacts and extent of impacts from future site-specific projects are unknown at this time.

### 4.16.5.2 Water Supply

Impacts related to water supply would be less than significant for the Blueprint SD Initiative, University CPU and Hillcrest FPA. As future CPUs, Specific Plans, or other FPAs are proposed consistent with Blueprint SD Initiative and the Village Climate Goal Propensity map, these actions would be accompanied by future WSAs, as applicable pursuant to the Water Code, to document the adequacy of future water supplies to accommodate projected growth as determined on a community basis. At the project level, WSAs may also be required for larger projects that meet specified thresholds of the Water Code. Additionally, building code and City landscape regulations would apply to ensure water efficiency in new buildings and landscapes. As discussed in the WSAs prepared for the University CPU and Hillcrest FPA, there would be adequate water supply in a normal, single-dry year, and multiple-dry year (20-year) period, to meet the estimated water demands within these communities through 2045, the water supply planning horizon. Therefore, impacts related to water supply would be less than significant and no mitigation is required.

### 4.16.5.3 Adequate Wastewater Capacity

At a program level of review, impacts related to adequate wastewater capacity would be significant due to the project's additional wastewater demand associated with anticipated development. As future development is implemented at the project-level consistent with the Blueprint SD Initiative, the University CPU, and the Hillcrest FPA, each individual project would be required to evaluate the physical impacts of development including any potential wastewater treatment improvements. At a project level of review, physical impacts would be avoided or minimized through required

compliance with the City's ESL Regulations, Historical Resources Regulations, and other applicable LDC requirements, as well as any additional project-specific mitigation measures as determined by the City. ~~Feasible mitigation that may be implemented at the project level is described in Chapter 9.0.~~ While it is expected that individual future development projects would be able to reduce physical impacts associated with providing wastewater treatment infrastructure, at a program level of review and without specific development plans available, it cannot be ensured that all impacts would be mitigated to a less than significant level. Thus, impacts would remain significant. No feasible mitigation measures are available at this time as the specific impacts and extent of impacts from future site-specific projects are unknown at this time.

#### **4.16.5.4 Solid Waste**

Impacts related to solid waste would be less than significant; therefore, no mitigation is required. Consistent with the program-level analysis, future development would be required to implement the City's existing and future regulations related to solid waste diversion and recycling, including Waste Management Plans, to demonstrate projects are consistent with all applicable regulations related to solid waste.

## 4.17 Water Quality

This section analyzes the potential for significant impacts related to water quality that could result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the City of San Diego’s (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (CPU) (hereinafter referred to as the “University CPU,” which includes rezones, amendments to the LDC and Land Development Code, and associated discretionary actions.

### 4.17.1 Existing Conditions

#### 4.17.1.1 Hydrologic Setting

The hydrologic setting in San Diego County, where the Blueprint SD Initiative project area, including the Climate Smart Village Areas, is located is described in Section 4.9.1.1 and the eleven major watersheds are shown in Figures 4.9-1a through 4.9-1e. The Hillcrest FPA area is located in two watersheds, the San Diego Watershed and the Pueblo San Diego Watershed, as shown in Figure 4.9-1b. The University CPU area is located in the Los Peñasquitos watershed as shown in Figures 4.9-1c and 4.9-1d.

The major receiving waters within the City include the Pacific Ocean, San Diego Bay, Mission Bay, the San Dieguito River, Los Peñasquitos Creek, the San Diego River, the Otay River, and the Tijuana River. Major reservoirs within or managed by the City include Barrett, El Capitan, San Vicente, Hodges, Miramar, Murray, Lower Otay, Upper Otay, and Sutherland. Additionally, there are minor receiving waters made up of creeks, channels, streams, and lagoons.

The Los Peñasquitos Lagoon and Mission Bay are the receiving waters for stormwater runoff from the University CPU area. The quality of stormwater runoff from the community impacts the health of the receiving waters. However, the community contributes only a small portion of the total water to each receiving location. Typical pollutants from land uses in the University CPU area include sediment, nutrients, heavy metals, organic compounds, trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses, and pesticides.

Much of the existing development in the University CPU and Hillcrest FPA areas was established before the adoption of stormwater regulations; therefore, there are limited existing on-site Low Impact Development (LID) Best Management Practices (BMPs) in place to capture and treat stormwater runoff. The Hillcrest FPA area is largely urbanized with minimal opportunities for infiltration except for the canyon areas. The University CPU area is mostly developed with minimal

opportunities for infiltration except for some undeveloped areas in the eastern portion of the community near the Miramar National Cemetery, open space within the University of California San Diego grounds, area canyons, and the Torrey Pines Golf Course in the northernmost section of the community.

Stormwater runoff originating in the University CPU area is conveyed in a variety of directions through streets, gutters, cross gutters, gullies, open channels, and storm drain systems. The majority of the storm drain network can be found in the southern portion of the community, where residential drainage structures are conveyed to larger stormwater mains which contribute stormwater to Rose and San Clemente Canyons. In general, the northern section of the community has more infiltration potential than the south.

In both the University CPU area and Hillcrest FPA area, much of the stormwater runoff is conveyed directly to the receiving waters via streets, gutters, and the storm drain system.

## 4.17.2 Regulatory Setting

Refer to Section 4.9.2 for a comprehensive discussion of the regulatory setting addressing water quality including federal, state, and local regulations.

## 4.17.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts related to water quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?
- 2) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

## 4.17.4 Impact Analysis

### Issue 1 Water Quality Standards or Waste Discharge Requirements

*Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

#### a. Water Quality Standards and Waste Discharge Requirements

Future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would have the potential to result in urban runoff and associated pollutant discharges. Urban runoff is surface water runoff generated from developed or

disturbed land associated with urbanization. The increase in impervious surfaces and the decrease in opportunities for infiltration within the landscape as a result of development associated with the project could increase stormwater flows and provide a source for sediment and other pollutants to enter receiving waters.

As future development occurs, applicable regulatory requirements would be triggered that would require the retention and/or treatment of stormwater through the implementation of LID BMPs. The City's National Pollutant Discharge Elimination System (NPDES) permit requirements would require future development to demonstrate how pollutants such as various trace metals (e.g., copper, lead, zinc, and mercury), fecal coliform, low dissolved oxygen, phosphorus, and total dissolved solids would be treated to prevent discharge into receiving waters. Additionally, the City's Municipal Separate Storm Sewer System (MS4) Permit requires the development of Water Quality Improvement Plans (WQIPs), administered through the Regional Water Quality Control Board and implemented by the City as a co-permittee, which would guide future development towards achieving improved water quality.

Under current stormwater regulations in the City, all projects are subject to certain minimum stormwater requirements to protect water quality. All development projects are required to submit a Stormwater Applicability Checklist (form DS-560) to determine the applicable stormwater requirements. Based on this form, the City ensures that the project has been properly identified as Priority Development Project, Standard Development Project or is Exempt from additional stormwater requirements. In the case of a Standard Development Project, the assigned reviewer checks the submitted construction documents to ensure that the project meets the minimum site design and source control BMP requirements set forth for all development projects in the Stormwater Standards Manual. If a project is determined to be a Priority Development Project, it is required to submit a Storm Water Quality Management Plan at initial submittal to ensure incorporation of structural BMPs at initial design.

If future proposed projects would disturb one or more acres of land, the project would be subject to the Construction Stormwater General Permit (Construction General Permit), Order No. WQ 2022-0057-DWQ (NPDES NO. CAS000002 ), issued by the State ~~Water~~ Water Resources Control Board (SWRCB), and would be required to prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to the City and the SWRCB. If the proposed project would disturb less than one acre of land, a Water Pollution Control Plan (WPCP) would be required to be prepared and submitted to the City. The SWPPP and WPCP require the project proponent to identify actions that would be implemented to prevent pollutants in stormwater discharges from the project site during construction. Should projects comply with the applicable stormwater requirements during construction, these permit conditions would address any water quality impacts.

Compliance with the City's NPDES and MS4 permits, Stormwater Standards Manual, Jurisdictional Runoff Management Plan, and San Diego Municipal Code (SDMC) requirements for stormwater management (collectively referred to as the "City Stormwater Regulations") would normally suffice to reduce water quality impacts to below a level of significance. Project compliance with the City Stormwater Regulations would preclude water quality impacts due to all ministerial and discretionary project being subject to compliance with the City's Stormwater Standards Manual; including requirements to implement applicable site design, source control, structural pollutant



control, and hydromodification BMPs. Implementation of required stormwater LID BMPs would reduce the amount of pollutants transported from future development projects to receiving waters. During operations, industrial projects that discharge stormwater to waters of the United States would comply with the requirements of the General Permit for Stormwater Discharges Associated with Industrial Activities (Industrial General Permit), Order No. 2014-0057-DWQ (NPDES No. CAS000001), issued by the SWRCB.

The City has also adopted the Municipal Waterways Maintenance Plan to repair and maintain the City's existing stormwater infrastructure, including channels, ditches, and stormwater pipes, to ensure adequate stormwater conveyance and reduce the volume of pollutants entering receiving waters. Further, the City continues to implement the goals and strategies identified in the WQIPs for the reduction of the highest priority pollutants of the applicable watershed, including, but not limited to, street sweeping and catch basin cleaning.

Future development implemented consistent with the project would be subject to the existing Stormwater Regulations in place at the time projects are implemented. Future development would need to provide an engineering analysis to demonstrate that the project can comply with the Stormwater Standards. Required compliance for future development with the applicable City Stormwater Regulations and WQIP implementation in compliance with the City's MS4 Permit would ensure adverse impacts related to compliance with water quality standards would be less than significant.

## **b. Impaired Waterbodies**

There are a number of waterbodies within the City that are designated on the Clean Water Act 303d list of impaired waterbodies. Future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would have the potential to result in new pollutant discharges to already impaired waterbodies which could further degrade the existing impairment of the water body. Projects that would discharge the same pollutant for which that waterbody is already impaired could exacerbate an existing condition and result in a significant impact. The impact may be lessened if there is an adopted Total Maximum Daily Load (TMDL) Program for this waterbody and associated pollutant that identifies the allowable pollutant load that may be discharged into the waterbody. If future development can demonstrate compliance with allowable pollutant loads, including implementation of applicable treatment control LID BMPs, the impacts would be less than significant.

If the waterbody does not yet have an adopted TMDL Program in place, the addition of this same pollutant to the water body could exacerbate an existing condition, leading to a significant impact. A water quality study would be needed to determine the anticipated pollutant loads from the project and to identify the pollutant load reduction from implementation of the applicable treatment control LID BMPs to reduce the discharge to the maximum extent practicable and to identify if the project discharge meets the applicable Basin Plan water quality standards or TMDL requirements. Development projects would be required to demonstrate that the project would not exacerbate the existing condition and would comply with the TMDL requirements. Due to required compliance with applicable water quality plans and regulations, individual projects would be required to reduce pollutant discharges to receiving waters to meet water quality standards. Therefore, due to required

implementation of applicable regulatory requirements including site specific LID BMPs and site design measures, impacts to impaired waterbodies resulting from future development would be less than significant.

### **c. Environmentally Sensitive Areas**

Future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, the University CPU would have the potential to discharge into a designated Environmentally Sensitive Area, which could result in a significant impact if those discharges would impair water quality or beneficial uses associated with that waterbody, including ~~onto~~ sensitive species. The City's designated Environmentally Sensitive Areas are identified in the City's Jurisdictional Runoff Management Plan Appendix XVI. Environmentally Sensitive Areas include 303d listed waters (discussed above), areas of special biological significance, and waterbodies designated with the "RARE" beneficial use, which includes uses of water that support habitats necessary, at least in part, for the survival and successful maintenance of plant or animal species established under state or federal law as rare, threatened, or endangered. Future development anticipated under the project would be required to demonstrate compliance with the applicable source control BMPs, site design LID BMPs, as well as pollutant control BMPs and hydromodification management BMPs, as identified in the City's Stormwater Regulations. Future development's required compliance with Stormwater Regulations at the time development is implemented would ensure pollutant discharges are reduced to the maximum extent practicable to avoid impacts to receiving waterbody. Therefore, impacts associated with future development anticipated due to implementation of the Blueprint SD Initiative, the University CPU, and Hillcrest FPA would be less than significant.

## **Issue 2 Water Quality Control Plan or Sustainable Groundwater Management Plan**

*Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As described in Issue 1 above, future development that could result due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be required to comply with the applicable WQIPs. Additionally, all development in the City is subject to the drainage regulations contained in the SDMC Chapter 14, Article 2, Division 2, Stormwater Runoff and Drainage Regulations, which require that all development be conducted to prevent erosion and stop sediment and pollutants from leaving the property to the maximum extent practicable (refer to Section 4.9). Future projects would be required to comply with the Water Quality Control Plan for the San Diego Basin, which includes the groundwater management plan and BMPs to be implemented at the project level. Thus, impacts would be less than significant.

### **Cumulative Impacts**

Future projects resulting from implementation of the project could contribute to cumulative impacts related to water quality, including water quality impacts and erosion, and sedimentation. However, all future development within the project areas would be required to comply with all NPDES permit

requirements, including the development of a SWPPP if the disturbed area covers one acre or more, or a WPCP if the disturbed area is less than one acre. Future development implemented consistent with the project would also be subject to the ~~existing~~ Stormwater Regulations in place at the time projects are implemented and would be required to follow the City's Stormwater Standards Manual for the installation of LID BMPs for stormwater treatment, as applicable. Through compliance with the existing regulatory framework, cumulative impacts would be less than significant.

## 4.17.5 Significance of Impacts

### 4.17.5.1 Water Quality Standards or Waste Discharge Requirements

Future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would have the potential to result in urban runoff and associated pollutant discharges. As future development occurs, applicable regulatory requirements would be triggered that would require the retention and/or treatment of stormwater through the implementation of BMPs. NPDES permit requirements would require future development to demonstrate how pollutants would be treated to prevent discharge into receiving waters. Additionally, the MS4 Permit requires development of WQIPs, administered through the Regional Water Quality Control Board and implemented by the City as a co-permittee, which would guide future development towards achieving improved water quality.

New development occurring within the project areas would be required to implement LID BMPs into the design of future projects within the project areas to address the potential for transport of pollutants of concern through either retention or filtration, consistent with the requirements of the MS4 Permit for the San Diego region and the City's Stormwater Standards Manual. Implementation of LID BMP design and stormwater construction BMPs, as identified in the SWPP or WPCP, would reduce the amount of pollutants transported from the project areas to receiving waters. Future development projects implemented under the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would also be subject to ~~existing~~ Stormwater ~~Regulations~~ in place at the time projects are implemented. Thus, through compliance with the existing regulatory framework addressing the protection of water quality, impacts would be less than significant.

### 4.17.5.2 Water Quality Control Plans

Future development that could result due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be required to comply with applicable WQIPs and the Water Quality Control Plan for the San Diego Basin which includes the groundwater management plan and BMPs to be implemented at the project level. Additionally, all development in the City is subject to the drainage regulations contained in the SDMC Chapter 14, Article 2, Division 2, Stormwater Runoff and Drainage Regulations, which require that all development be conducted to prevent erosion and stop sediment and pollutants from leaving the property to the maximum extent practicable. Thus, impacts would be less than significant.

### **4.17.6 Mitigation, Monitoring and Reporting**

As detailed in the preceding analysis, all impacts would be less than significant. Implementation of the SDMC and the City's Storm Water Standards Manual at the time of development is proposed would ensure water quality impacts are reduced to less than significant.

## 4.18 Wildfire

This section analyzes potential significant impacts as it relates to wildfire that could result from implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”), which includes rezones, amendments to the Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (CPU) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the Land Development Code LDC, and associated discretionary actions.

The analysis in this section is based on the California Department of Forestry and Fire Protection (CAL FIRE) metadata for fire threat levels and fire hazard severity zone mapping.

### 4.18.1 Existing Conditions

#### 4.18.1.1 Wildfire Risk Factors

Threats from wildfire hazards are determined based on several factors, including fuel loading (vegetation); topography; climatic conditions, such as wind, humidity, and temperature; and the proximity of structures and urban development to fire hazards. Wildland fire hazards are most pronounced in wildland-urban interface areas, or where urban development is located close to open space areas where vegetation can serve as fuel. Human activity, including residential and agricultural burning, campfires, and the use of fireworks can all trigger fires. Natural causes such as lightning strikes may also start fires.

##### a. Vegetation / Fuels

Variations in vegetative cover type and species composition have a direct effect on fire behavior. Some plant communities and their associated plant species have increased flammability based on plant physiology (resin content), biological function (flowering, retention of dead plant material), physical structure (bark thickness, leaf size, branching patterns), and overall fuel loading. For example, non-native grass-dominated plant communities become seasonally prone to ignition and produce lower intensity, higher spread rate fires. In comparison, sage scrub can produce higher heat intensity and higher flame lengths under strong, dry wind patterns, but does not typically ignite or spread as quickly as grass fuels.

## b. Topography

Topography influences fire risk by affecting fire spread rates. Typically, steep terrain results in faster fire spread upslope and slower spread down-slope. Terrain that forms a funneling effect, such as chimneys, chutes, or saddles on the landscape can result in especially intense fire behavior. Conversely, flat terrain tends to have little effect on fire spread, resulting in fires that are driven by vegetation and wind.

## c. Climate

The City, like much of southern California, is influenced by the Pacific Ocean and a seasonal, migratory subtropical high-pressure cell known as the “Pacific High.” Wet winters and dry summers with mild seasonal changes characterize the southern California climate. This climate pattern is occasionally interrupted by extreme periods of hot weather, winter storms, or dry, easterly Santa Ana winds. Generally, the periods of greatest risk for wildland fire are the late summer and early fall when vegetation is at its driest although fire risk exists year-round.<sup>17</sup>

### 4.18.1.2 Wildfire Hazard Mapping

CAL FIRE has identified areas based on the severity of fire hazard. These areas, or “zones,” are based on factors such as fuel (e.g., flammable vegetation), slope, and fire weather. There are three zones, based on increasing fire hazard: moderate, high, and very high fire hazard severity zones. CAL FIRE also maps fire threat potential throughout California. CAL FIRE ranks fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate).

The fire hazard mapping for the Blueprint SD Initiative Climate Smart Village Areas, Hillcrest FPA area, and the University CPU area are described in the following subsections. For the Blueprint SD Initiative Climate Smart Village Areas, reported acreages are based on areas with a village propensity value between 7 through 14; although the development of increased residential and employment density may occur in other areas of the City depending on an area’s village characteristics and proximity to transit. The Blueprint SD Initiative’s policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, impacts associated with future development are more likely to be concentrated in these areas.



## a. Blueprint SD Initiative Climate Smart Village Areas

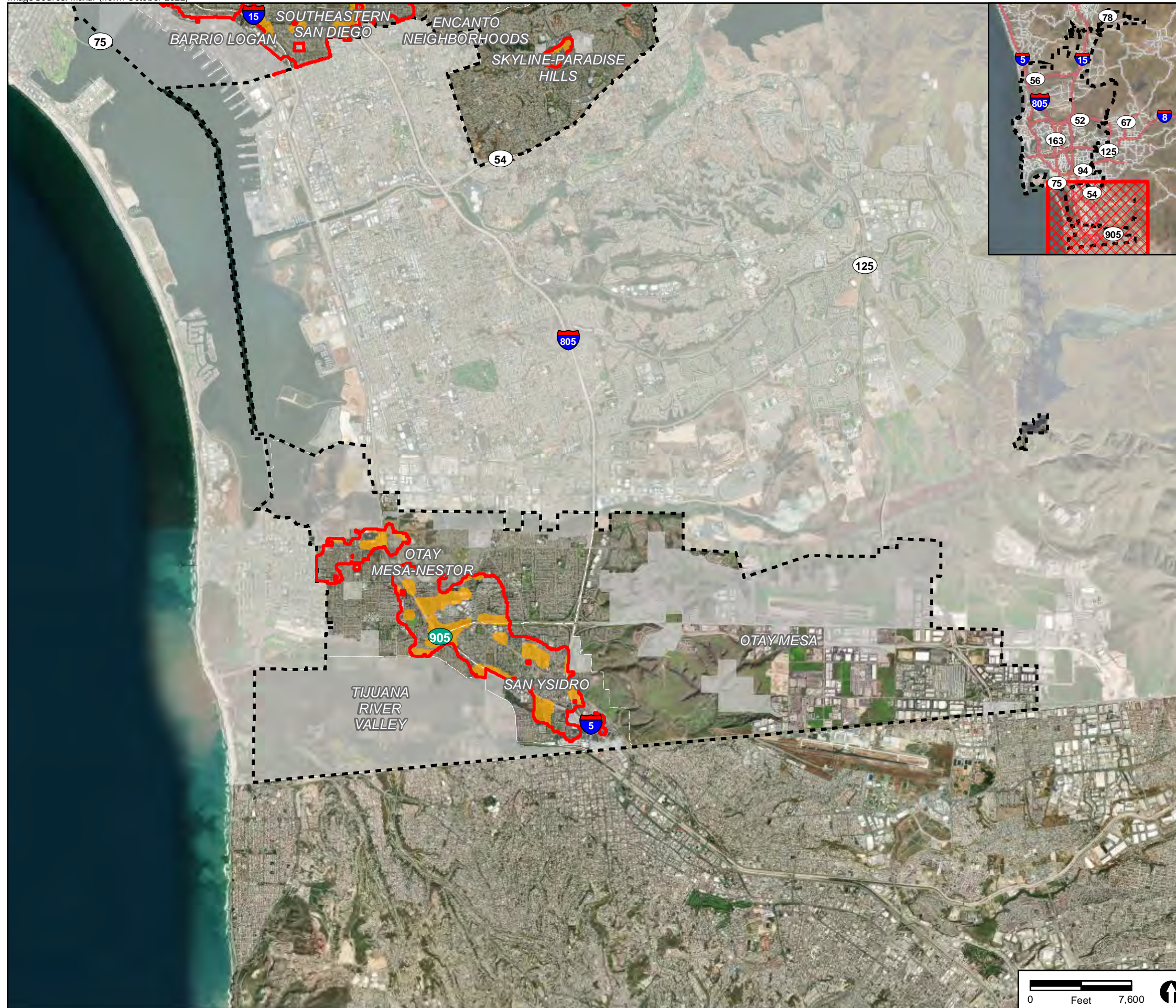
As shown in Figures 4.18-1a through 4.18-1e and detailed in Table 4.18-1, approximately 7,415 acres, or 30 percent of the Blueprint SD Initiative Climate Smart Village Areas are located in a very high fire hazard severity zone based on the City's latest update to the fire hazard severity zone mapping. However, the Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide. Nevertheless, it is anticipated that future increases in development densities and intensities would most likely be focused within the Climate Smart Village Areas; therefore, impacts associated with future development are more likely to be concentrated in these areas.

CAL FIRE also maps fire threat potential throughout California. CAL FIRE ranks fire threat based on the availability of fuel and the likelihood of an area burning (based on topography, fire history, and climate). Fire threat ratings for the Blueprint SD Initiative Climate Smart Village Areas are shown in Figures 4.18-2a through 4.18-2e. As shown in Table 4.18-2, the majority of the project areas are located within a moderate threat level.

Table 4.18-1 Very High Fire Hazard Severity Zones within the Blueprint SD Initiative Climate Smart Village Area	
Fire Hazard Severity Zones	Acres <sup>1</sup>
Very High Fire Hazard Severity Zone	7,415.19
SOURCE: SANGIS 2023	
NOTE: Numbers in the table are approximate.	
<sup>1</sup> Acres are based on areas with a village propensity value between 7 and 14; however, development may occur outside of these areas depending on an area's village characteristics and proximity to transit.	

Table 4.18-2 Fire Threat within the Blueprint SD Initiative Climate Smart Village Areas	
Fire Threat	Acres <sup>1</sup>
High Threat	157
Little to No Threat	954
Moderate Threat	42,420
Very High Threat	406
<b>Total</b>	<b>43,939</b>
SOURCE: CAL FIRE 2014	
NOTE: Numbers in the table are approximate.	
<sup>1</sup> Acres are based on areas with a village propensity value between 7 and 14; however, development may occur outside of these areas depending on an area's village characteristics and proximity to transit.	

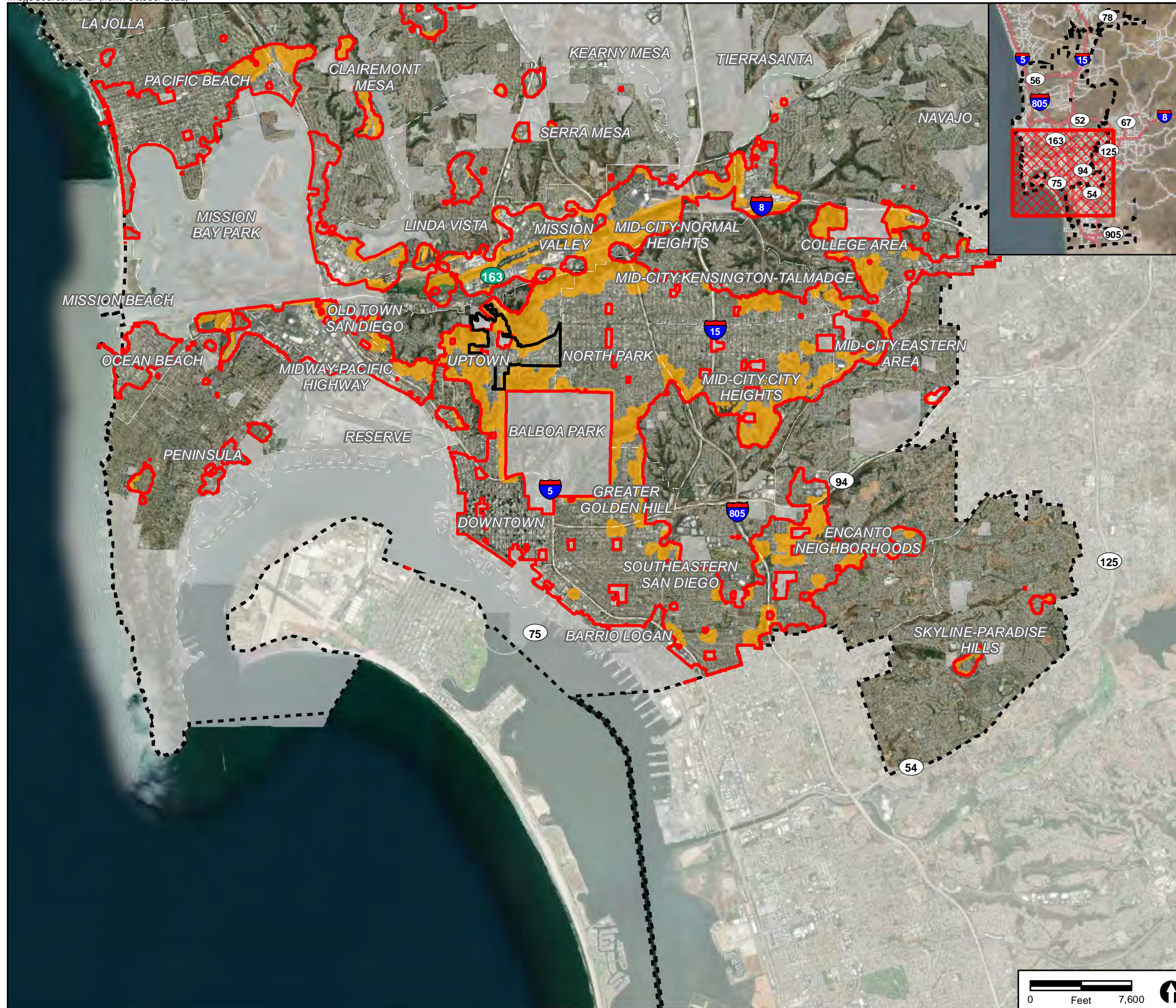




- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Exclusion Area
- Very High Fire Hazard Severity Zone

FIGURE 4.18-1a  
Fire Hazard Severity Zones in Relation to  
the Project Areas - South

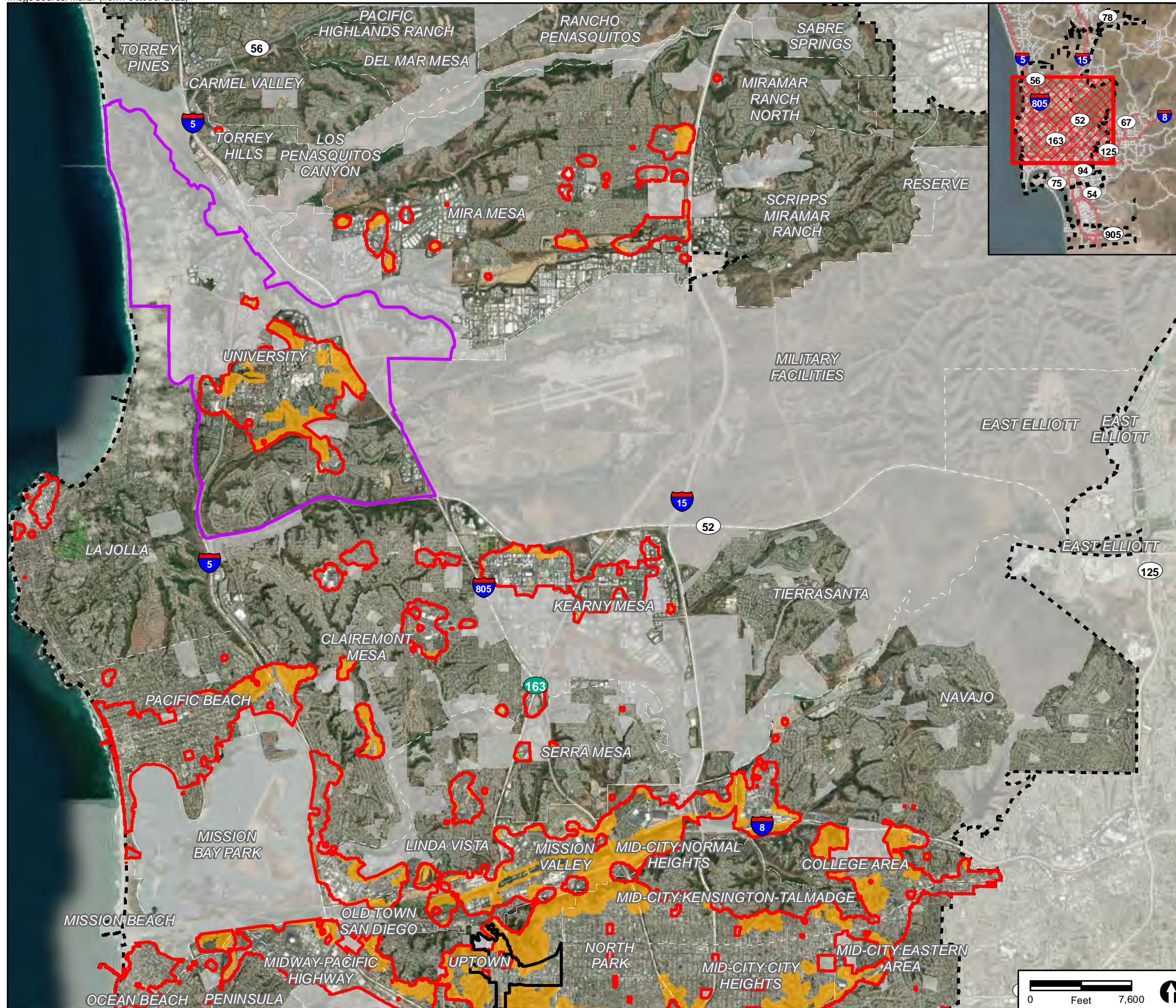




- Red outline: Blueprint SD Initiative Climate Smart Village Areas
- Black outline: Hillcrest Focused Plan Amendment Area
- Dashed black line: San Diego City Limits
- Grey area: Exclusion Area
- Yellow area: Very High Fire Hazard Severity Zone

FIGURE 4.18-1b  
Fire Hazard Severity Zones in Relation to  
the Project Areas - South Central











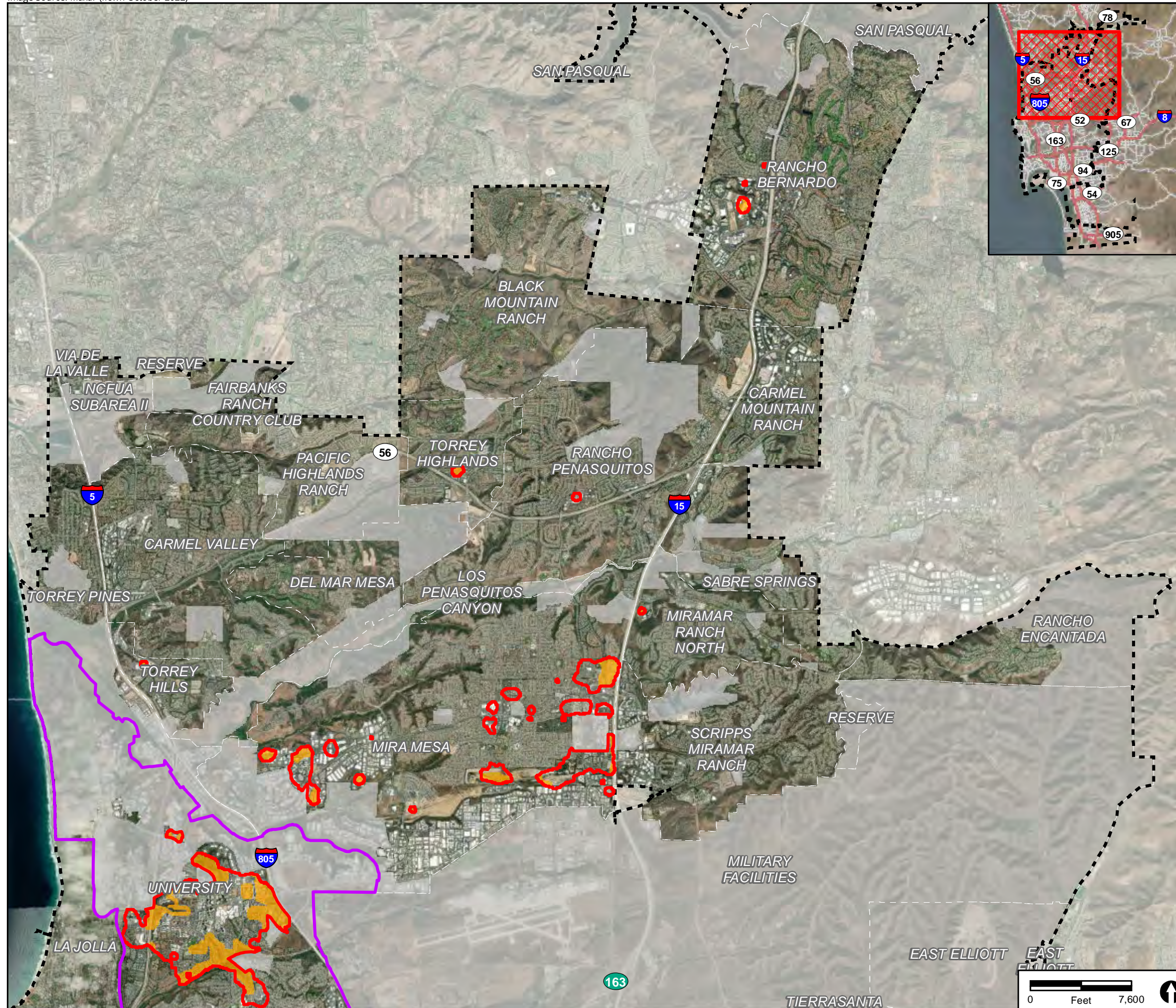
-  Blueprint SD Initiative Climate Smart Village Areas
-  Hillcrest Focused Plan Amendment Area
-  University Community Plan Update Area
-  San Diego City Limits
-  Exclusion Area
-  Very High Fire Hazard Severity Zone

FIGURE 4.18-1c  
Fire Hazard Severity Zones in Relation to  
the Project Areas - North Central










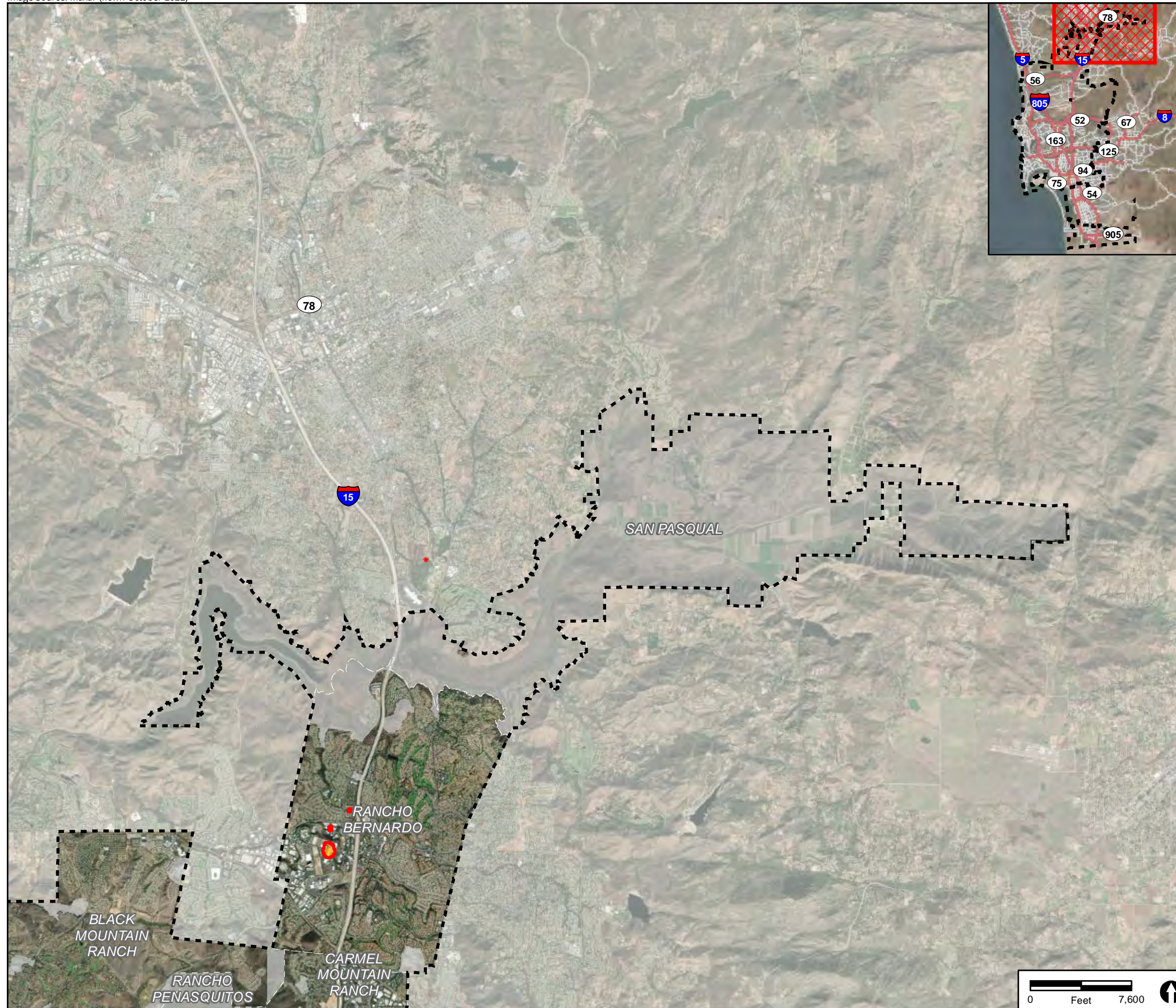
-  Blueprint SD Initiative Climate Smart Village Areas
-  University Community Plan Update Area
-  San Diego City Limits
-  Exclusion Area
-  Very High Fire Hazard Severity Zone

FIGURE 4.18-1d  
Fire Hazard Severity Zones in Relation to  
the Project Areas - North









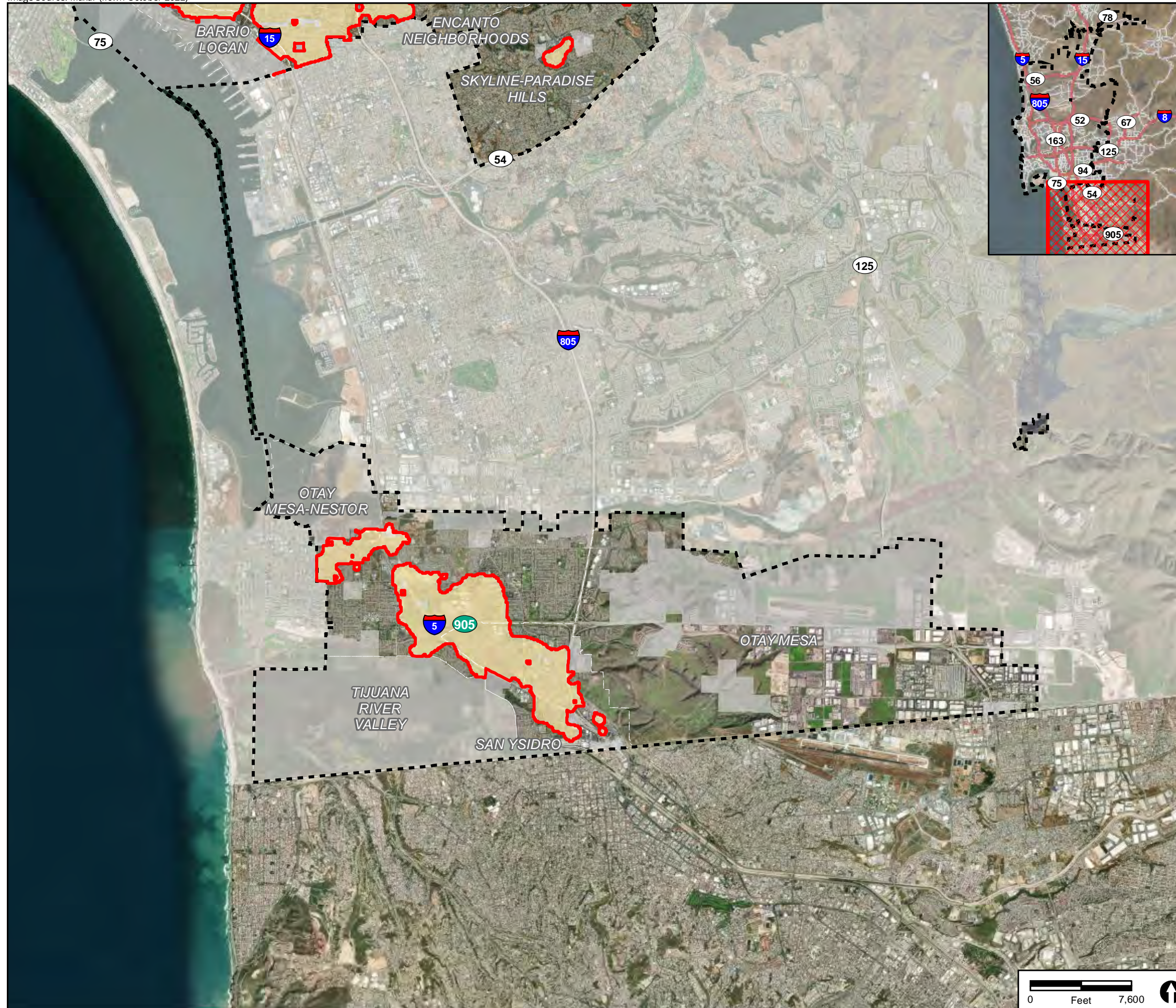
-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Exclusion Area
-  Very High Fire Hazard Severity Zone



FIGURE 4.18-1e  
Fire Hazard Severity Zones in Relation to  
the Project Areas - Northeast

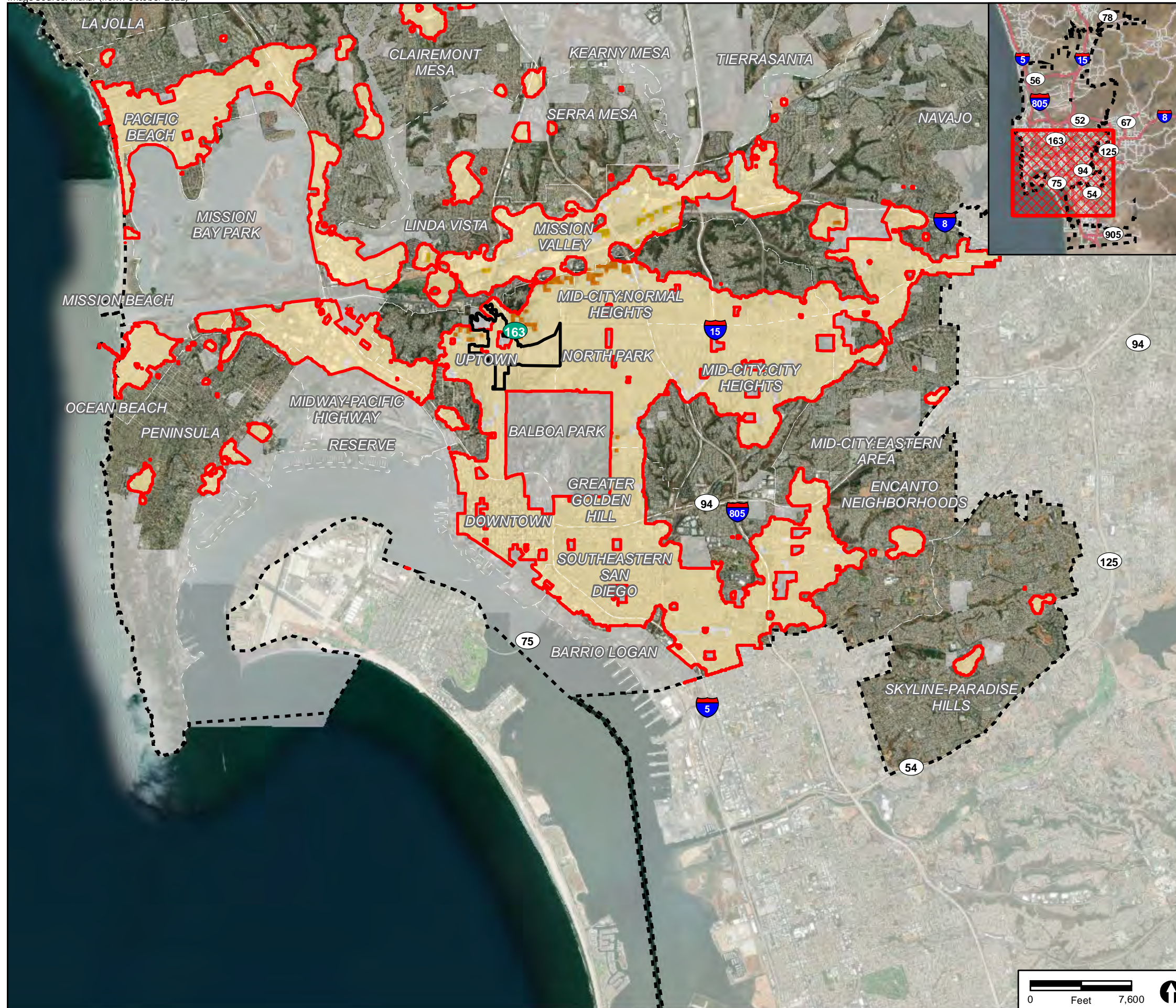




- Blueprint SD Initiative Climate Smart Village Areas
- San Diego City Limits
- Exclusion Area
- Fire Threat Level (Cal Fire)**
  - Little to No Threat
  - Moderate Threat
  - High Threat
  - Very High Threat
  - Extreme Threat

FIGURE 4.18-2a  
Fire Threat Level in Relation to  
the Project Areas - South

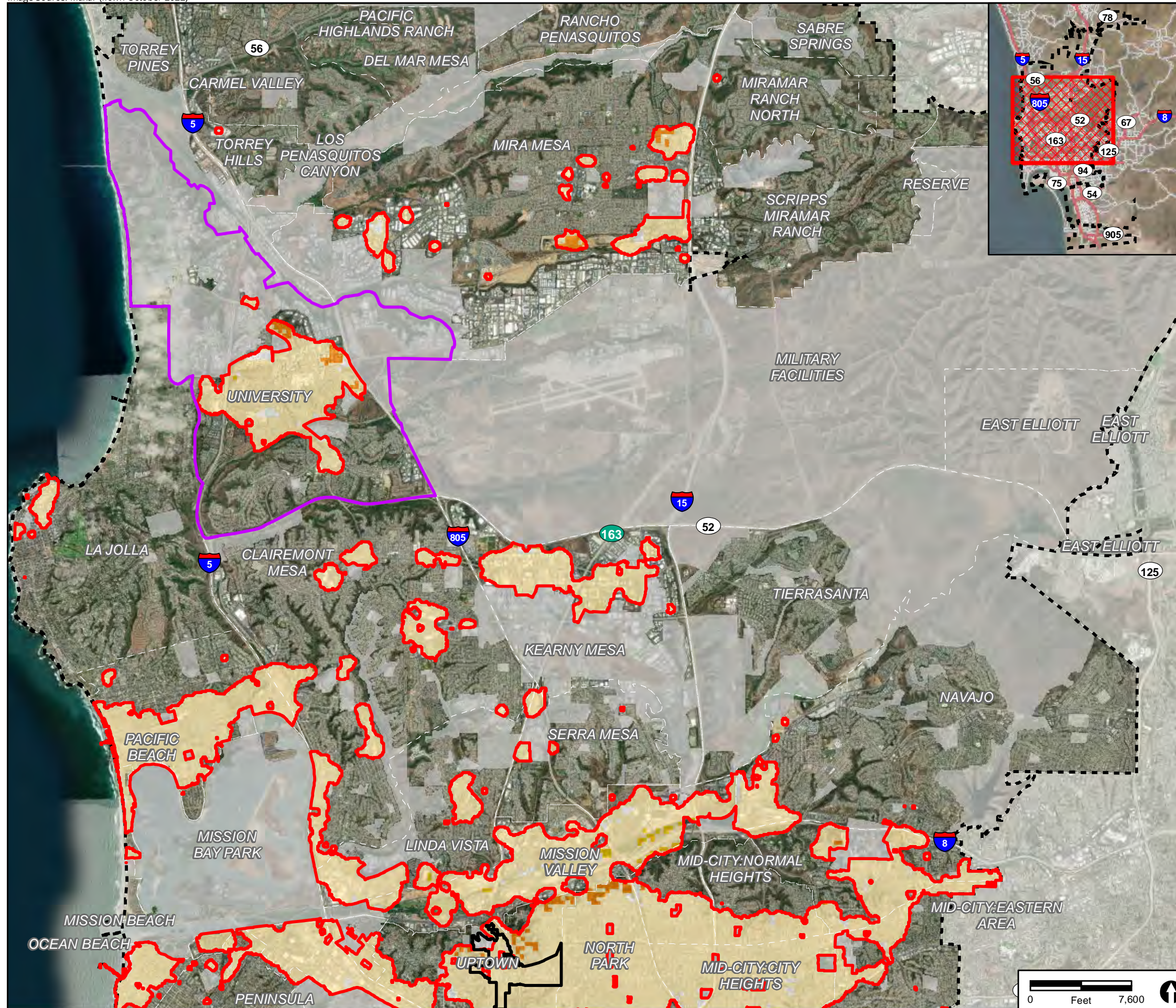




- Blueprint SD Initiative Climate Smart Village Areas
- Hillcrest Focused Plan Amendment Area
- San Diego City Limits
- Exclusion Area
- Fire Threat Level (Cal Fire)**
  - Little to No Threat
  - Moderate Threat
  - High Threat
  - Very High Threat
  - Extreme Threat

FIGURE 4.18-2b  
Fire Threat Level in Relation to  
the Project Areas - South Central

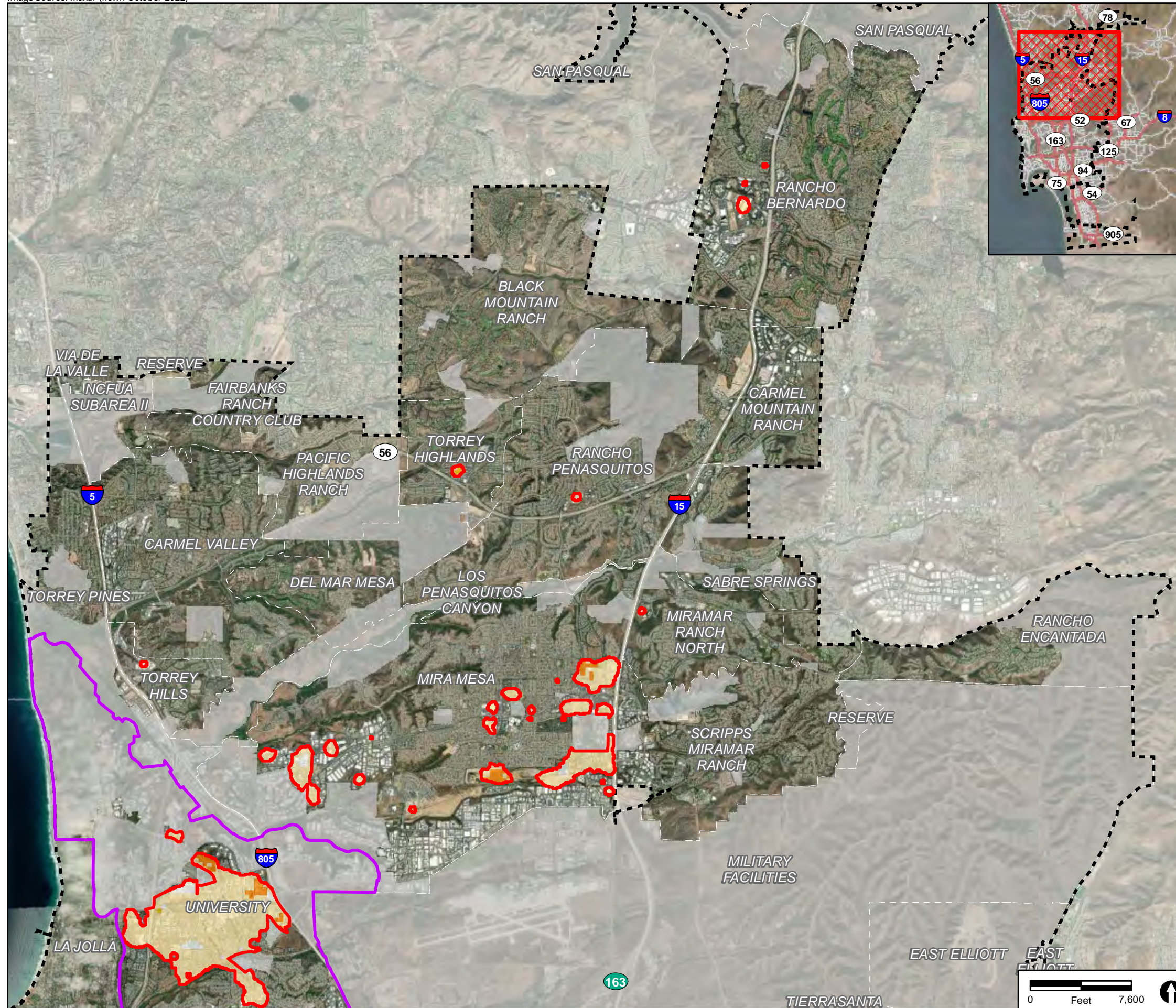




- Blueprint SD Initiative Climate Smart Village Areas
  - Hillcrest Focused Plan Amendment Area
  - University Community Plan Update Area
  - San Diego City Limits
  - Exclusion Area
- Fire Threat Level (Cal Fire)**
- Little to No Threat
  - Moderate Threat
  - High Threat
  - Very High Threat
  - Extreme Threat

FIGURE 4.18-2c  
Fire Threat Level in Relation to  
the Project Areas - North Central

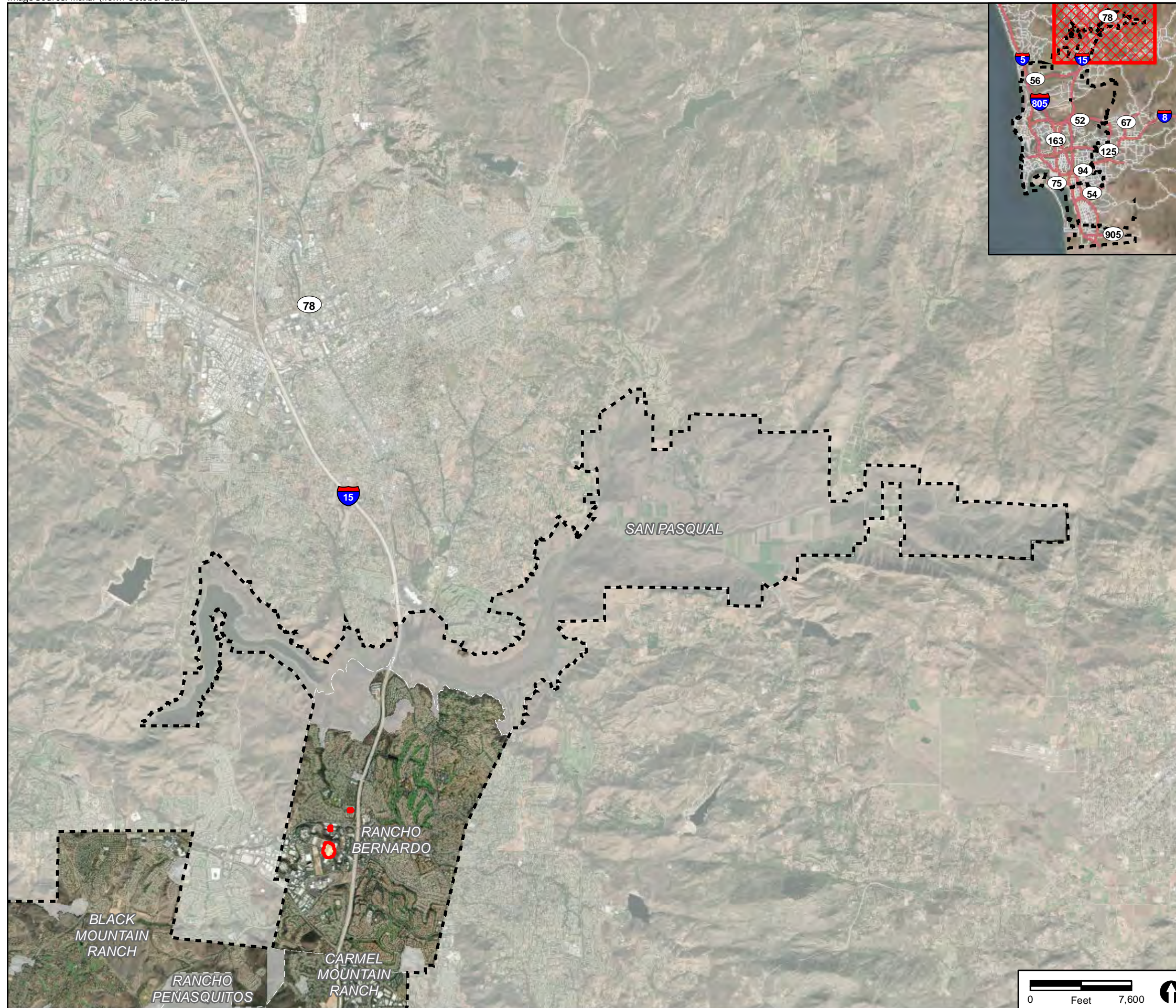




- Blueprint SD Initiative Climate Smart Village Areas
- University Community Plan Update Area
- San Diego City Limits
- Exclusion Area
- Fire Threat Level (Cal Fire)**
  - Little to No Threat
  - Moderate Threat
  - High Threat
  - Very High Threat
  - Extreme Threat

FIGURE 4.18-2d  
Fire Threat Level in Relation to  
the Project Areas - North













-  Blueprint SD Initiative Climate Smart Village Areas
-  San Diego City Limits
-  Exclusion Area
- Fire Threat Level (Cal Fire)**
  -  Little to No Threat
  -  Moderate Threat
  -  High Threat
  -  Very High Threat
  -  Extreme Threat

FIGURE 4.18-2e  
Fire Threat Level in Relation to  
the Project Areas - North



## b. Hillcrest Focused Plan Amendment Area

As shown in Figure 4.18-3 portions of the Hillcrest FPA area are located in a very high fire hazard severity zone. There are approximately 153.5 acres of Very High Fire Hazard Severity Zone in the Hillcrest FPA Area. Fire threat within the Hillcrest FPA area is shown in Figure 4.18-4. As shown in Table 4.18-3, the majority of the Hillcrest FPA area is located within a moderate threat level, with a small area of very high threat in the north where the Hillcrest FPA area is located adjacent to canyons.

Table 4.18-3 Fire Threat within the Hillcrest FPA	
Fire Threat	Acres
Little to No Threat	4
Moderate Threat	373
Very High Threat	3
<b>Total</b>	<b>380</b>
SOURCE: CAL FIRE 2014	
NOTE: Numbers in the table are approximate.	

## c. University Community Plan Area

As shown in Figure 4.18-5 and detailed in Table 4.18-4, the majority of the University CPU area is located in a very high fire hazard severity zone. Approximately 6,836 acres of the University CPU area is located in a very high fire hazard severity zone.

Table 4.18-4 University Community Plan Very High Fire Hazard Severity Zones	
Fire Hazard Severity Zones	Acres
Very High Fire Hazard Severity Zone	6,836
<b>Total</b>	<b>8,672</b>
SOURCE: SANGIS 2023	
NOTE: Numbers in the table are approximate.	



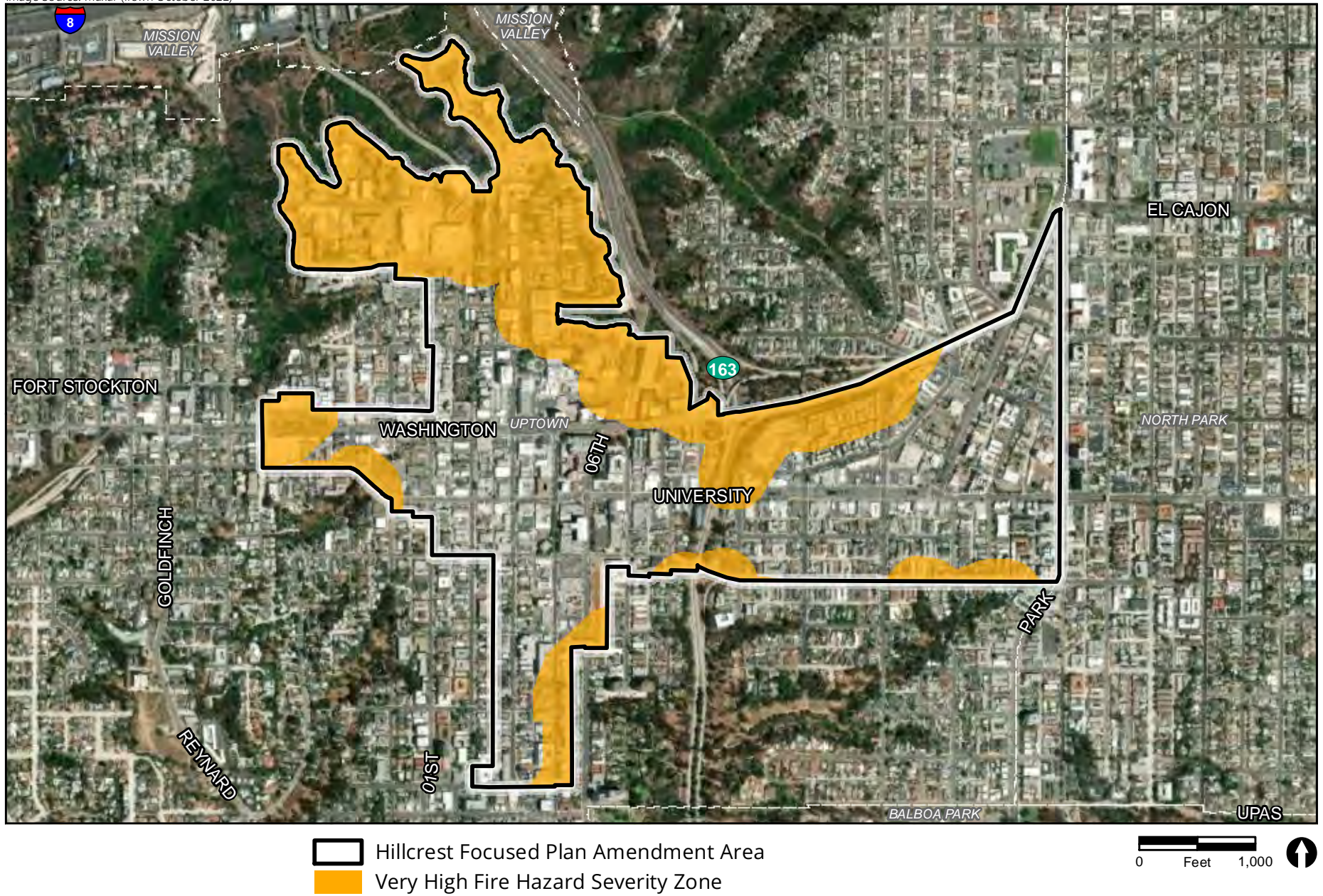
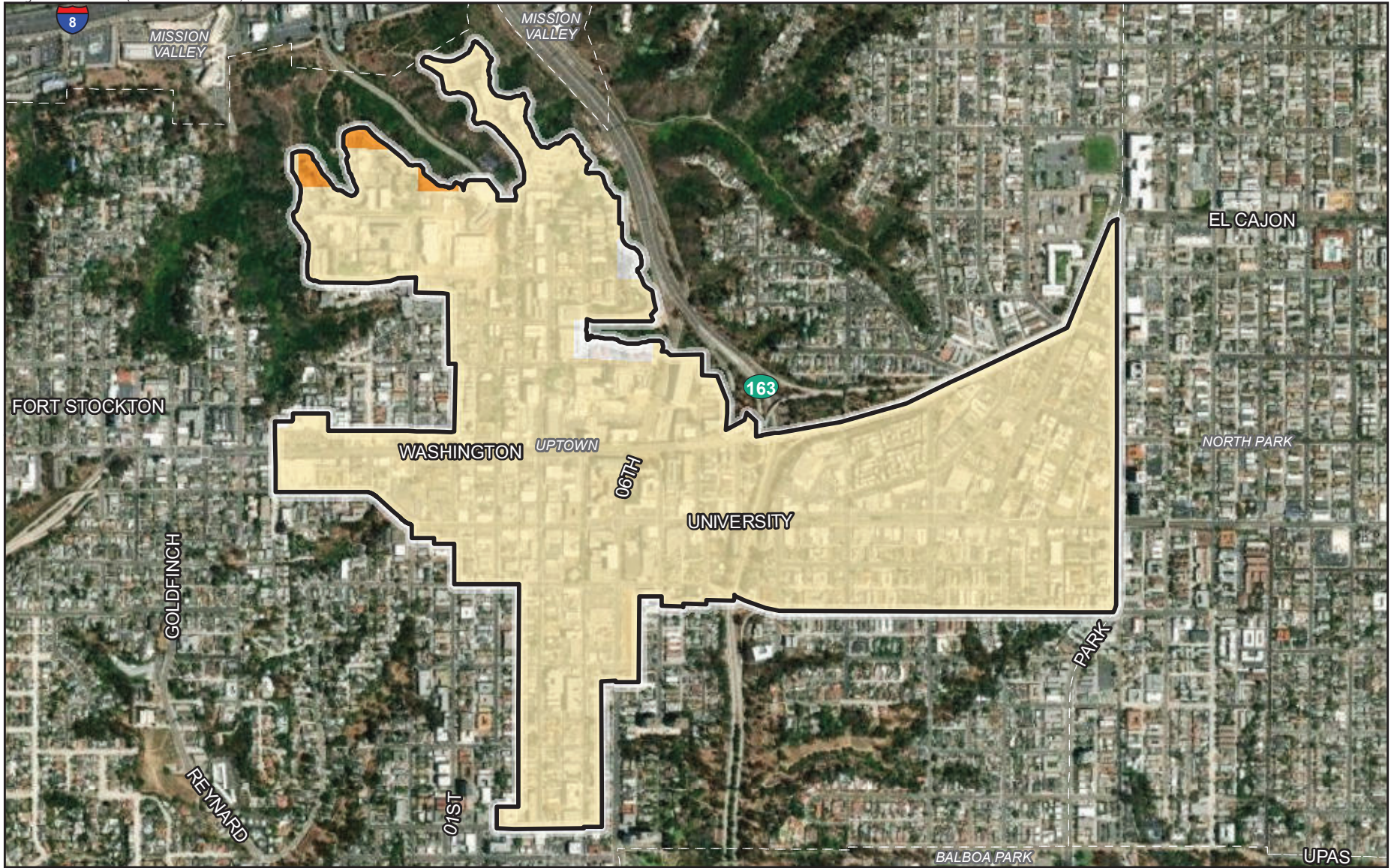


FIGURE 4.18-3  
Fire Hazard Severity Zones in Relation to  
Hillcrest Focused Plan Amendment Area





 Hillcrest Focused Plan Amendment Area

**Fire Threat Level (Cal Fire)**

Little to No Threat

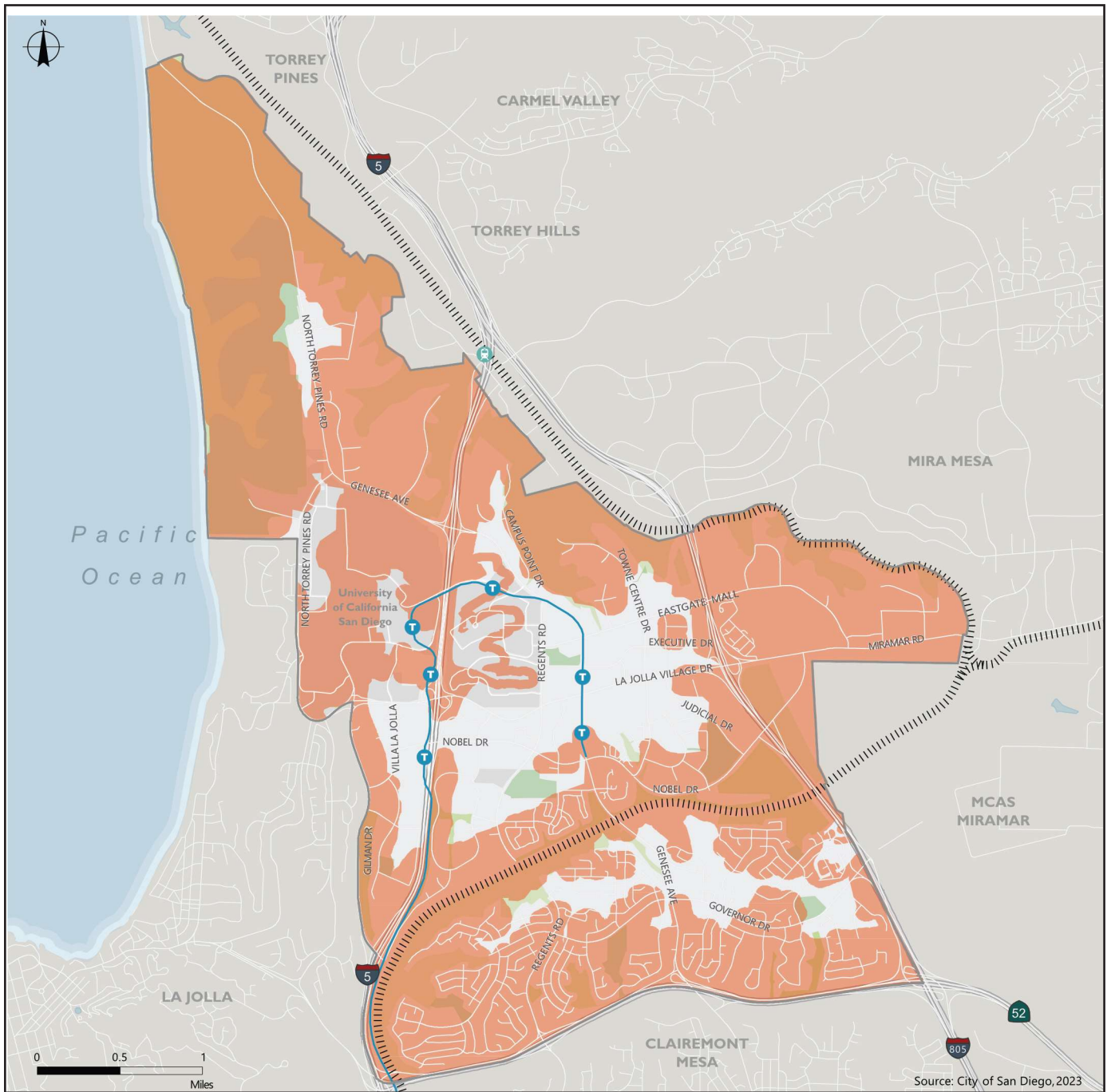
 Moderate Threat

 Very High Threat



FIGURE 4.18-4  
Fire Threat Level in Relation to  
Hillcrest Focused Plan Amendment Area






 Very High Fire Hazard Severity Zone

FIGURE 4.18-5

Fire Hazard Severity Zones in Relation to University Community Plan Update Area

The fire threat for the University CPU area is shown in Figure 4.18-6. As shown in Table 4.18-5, the majority of the University CPU area is located within a moderate threat level according to CAL FIRE mapping.

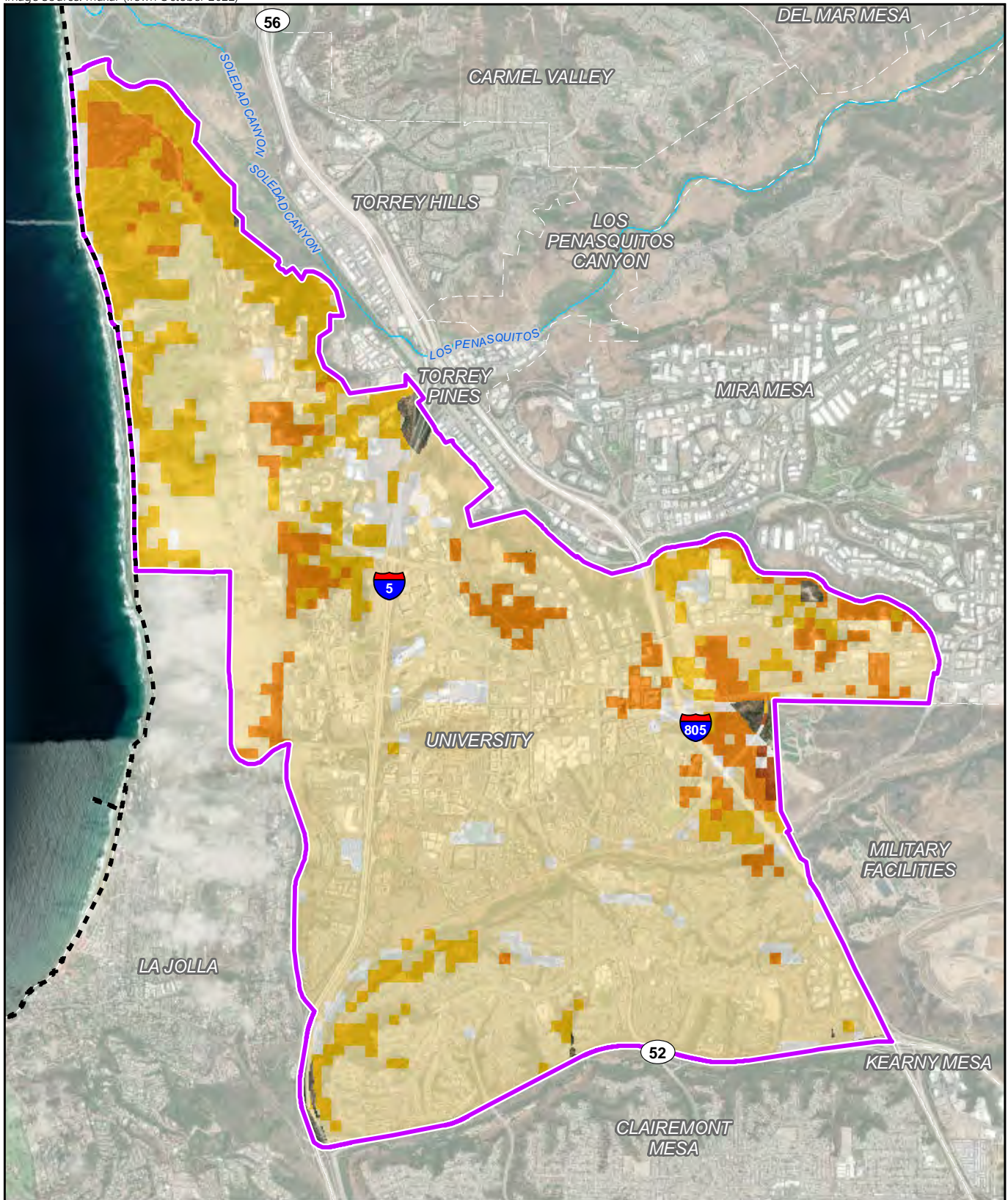
<b>Table 4.18-5 University Community Plan Fire Threat</b>	
<b>Fire Threat</b>	<b>Acres</b>
High Threat	1,220
Little to No Threat	446
Moderate Threat	6,217
Very High Threat	663
Extreme Threat	16
<b>Total</b>	<b>8,562</b>
SOURCE: CAL FIRE 2015	
NOTE: Numbers in the table are approximate.	

### 4.18.1.3 Emergency Preparedness and Response

The County of San Diego (County) Office of Emergency Services (OES) coordinates the overall County response to disasters. OES is responsible for notifying appropriate agencies when a disaster occurs, coordinating all responding agencies, ensuring that resources are available and mobilized, developing plans and procedures for response to and recovery from disasters, and developing and providing preparedness materials for the public. The City's Emergency Operations Plan, San Diego Police Department (SDPD) Policy and Procedures, Operational Area Emergency Plan, and the California Master Mutual Aid Agreement dictate who is responsible for an evacuation effort and how regional resources will be requested and coordinated. In the event of a disaster that requires an emergency evacuation, the SDPD in coordination with other agencies would identify transportation and evacuation points and coordinate the relocation of people to safe areas. Major ground transportation corridors in the City would be used as primary evacuation routes during an evacuation effort. Primary evacuation routes consist of the major interstates, highways, and prime arterials within San Diego County.

The OES staffs the Operational Area Emergency Operations Center (EOC), a central facility that provides regional coordinated emergency response, and also acts as staff to the Unified Disaster Council, its governing body. The Unified Disaster Council, established through a joint powers agreement among all 18 incorporated cities and the County of San Diego, provides for the coordination of plans and programs countywide to ensure the protection of life and property.



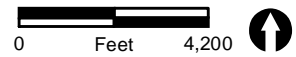


**Fire Threat Level (Cal Fire)**

- Little to No Threat
- Moderate Threat
- High Threat
- Very High Threat
- Extreme Threat



- San Diego City Limits
- University Community Plan Update Area



**FIGURE 4.18-6**  
Fire Threat Level in Relation to  
University Community Plan Update Area

The City's disaster prevention and response activities are conducted in accordance with the U.S. Department of Homeland Security Office of Domestic Preparedness requirements, and incorporate the functions of planning, training, exercising, and execution. The City's disaster preparedness efforts include oversight of the City's EOC, including maintaining the EOC in a continued state of readiness, training City staff and outside agency representatives in their roles and responsibilities, and coordinating EOC operations when activated in response to an emergency or major event/incident.

The San Diego Fire-Rescue Department (SDFD) services a total of approximately 343 square miles, and encompasses all fire, emergency medical, lifeguard and emergency management services. There are 52 fire stations which are located throughout the City.

## **4.18.2 Regulatory Setting**

### **4.18.2.1 Federal Regulations**

For regulations pertaining to flood plain management, refer to Section 4.9.2.1.

#### **a. Disaster Mitigation Act**

The Disaster Mitigation Act of 2000 requires that a state mitigation plan, as a condition of disaster assistance, add incentives for increased coordination and integration of mitigation activities at the state level through the establishment of requirements for two different levels of state plans: "Standard" and "Enhanced." States that develop an approved Enhanced State Plan can increase the amount of funding available through the Hazard Mitigation Grant Program. The Disaster Mitigation Act also established a new requirement for local mitigation plans.

### **4.18.2.2 State Regulations**

For regulations pertaining to flood management, refer to Section 4.9.2.2.

#### **a. Attorney General Wildfire Guidance**

The California Office of the Attorney General issued guidance (Guidance) outlining best practices for analyzing and mitigating wildfire impacts of development projects under the California Environmental Quality Act (CEQA) (California Office of the Attorney General 2022). The Guidance is intended to help local governments' evaluation and approval considerations for development projects in fire-prone areas, and to help project design in a way that minimizes wildfire ignition and incorporates emergency access and evacuation measures. Importantly, the Guidance does not impose additional legal requirements on local governments, nor does it alter any applicable laws or regulations. The Guidance suggests best practices including establishing baseline conditions, guidance for local governments in establishing thresholds of significance, modeling fire behavior and risk, providing qualitative assessment of fire risk, and offering potential measures to mitigate fire risk. The Guidance additionally addresses wildfire evacuation analysis best practices.



In wildfire-prone areas, the California Office of the Attorney General Guidance (in Section IV C. Analyzing the Project's Impact on Evacuation and Emergency Access), notes that a lead agency would be best positioned to ensure that a proposed development project facilitates emergency access and ease constraints on evacuation with an assessment of evacuation modelling and planning prior to project approval. The Guidance states that evacuation modeling and analysis should include the following:

- Evaluation of the capacity of roadways to accommodate project and community evacuation and simultaneous emergency access.
- Assessment of the timing for evacuation.
- Identification of alternative plans for evacuation depending upon the location and dynamics of the emergency.
- Evaluation of the project's impacts on existing evacuation plans.
- Consideration of the adequacy of emergency access, including the project's proximity to existing fire services and the capacity of existing services.
- Traffic modeling to quantify travel times under various likely scenarios.
- If a project presents significant increased wildfire risks and/or evacuation and access impacts, CEQA requires the lead agency to consider and adopt feasible alternatives and mitigation measures to avoid or reduce the project's impacts (or make a finding of overriding consideration).

## **b. California Wildland-Urban Interface Code**

On September 20, 2005, the California Building Standards Commission approved the Office of the State Fire Marshal's emergency regulations amending the California Building Code (CBC) (California Code of Regulations [CCR] Title 24, Part 2). Section 701A of the CBC includes regulations addressing materials and construction methods for exterior wildfire exposure and applies to new buildings located in State Responsibility Areas or Very High Fire Hazard Severity Zones in Local Response Areas.

## **c. California Fire Code**

The 2016 California Fire Code (Fire Code) (CCR Title 24, Part 9) establishes regulations to safeguard against the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises. The Fire Code also establishes requirements intended to provide safety for and assistance to firefighters and emergency responders during emergency operations. The provisions of the Fire Code apply to the construction, alteration, movement, enlargement, replacement, repair, equipment, use and occupancy, location, maintenance, removal, and demolition of every building or structure throughout California. The Fire Code includes regulations regarding fire-resistance-rated construction, fire protection systems such as alarm and sprinkler systems, fire services features such as fire apparatus access roads, means of egress, fire safety

during construction and demolition, and wildland-urban interface areas. The City has adopted the Fire Code as Chapter 5, Article 5, Division 1 of the City's Municipal Code (SDMC), including appendices addressing fire-flow requirements for buildings.

#### **d. Evacuation Planning Bills - Senate Bill 99 and Assembly Bill 747 -**

Senate Bill 99 [Government Code Section 65302, subdivision (g)(5)] requires Safety Elements to identify residential developments in any hazard area that do not have at least two emergency evacuation routes. Assembly Bill 747 (Government Code Section 65302.15) requires jurisdictions to identify evacuation routes and their capacity, safety, and viability under various emergency scenarios. Refer to Section 4.18.2.3c for details about local evacuation procedures.

### **4.18.2.3 Local Regulations**

For regulations pertaining to flood plain management, refer to Section 4.9.2.3.

#### **a. San Diego Fire Code**

The City's Fire Code consists of SDMC Sections 55.0101 through 55.9401, which adopts the 2022 Fire Code with some modifications, and applicable sections of the CCR. Provisions of the Fire Code are described under State Regulations, above. In 2022, the City adopted local amendments to the Fire Code addressing requirements for secondary emergency access. As detailed in SDMC Chapter 5, Article 11, Division 82, Appendix D, Section D106.2.1, the City requires multiple family residential developments with more than 30 dwelling units located in a state responsibility area (SRA) or a Very High Fire Hazard Severity Zone to be provided with two separate and approved fire apparatus access roads. Additionally, as specified in SDMC Chapter 5, Article 11, Division 82, Appendix D, Section D107.1 requires developments of one- or two-family dwellings where the number of dwelling units exceeds 30 shall be provided with two separate and approved fire apparatus access roads with certain exceptions.

#### **b. San Diego Fire-Rescue Wildland Management and Enforcement Programs**

The SDFD Wildland Management and Enforcement section runs four programs including the Real Estate Defensible Space Inspection Program, Proactive Door to Door Brush Management Program, Annual Weed Abatement Vacant Lot Program and the Weed Abatement and Brush Complaint Program. The SDFD does not have resources to conduct weed abatement on behalf of privately owned parcels within the City.

The Real Estate Defensible Space Inspection program went into effect as of July 1, 2021, when Assembly Bill 38 became California Civil Code 1102.19(a) and established that when you sell property that is located in a high or very high fire hazard severity zone documentation of a compliant defensible space inspection that complies with Section 4291 of the Public Resources Code or local vegetation management ordinances (SDMC 142.0412) is required.

The proactive Door-to-Door Brush Management Program is a citywide program where there is a door-to-door brush assessment conducted of privately owned properties on a canyon rim in the very high hazard severity zone in the City, which is the local responsibility area. Assessments of properties that are not within the program are performed on a complaint basis only.

The Annual Weed Abatement Vacant Lot Program is focused on addressing privately owned vacant lots that are not in compliance with brush management regulations. The SDFD does not have the resources to conduct weed abatement, therefore, a privately contracted company is used to perform necessary services. The Weed Abatement and Brush Complaint Program is a program that includes a process to submit complaints about unmaintained brush. This program includes appropriate contacts for weed abatement complaints and provides for investigation of complaints located on public and privately owned land in the City.

### **c. San Diego Fire-Rescue Constrained Parcel Surveys**

Consistent with the requirements of Senate Bill 99 and Assembly Bill 747 to provide ongoing evaluation of evacuation routes, the SDFD, in coordination with the CAL FIRE, conducts a survey of subdivisions of more than 30 dwelling units located in a SRA or Local Responsibility Area Very High Fire Hazard Severity Zone without a secondary egress route that are at significant fire risk. This survey identifies constrained parcels, or any residential development within a hazard area that does not have at least two emergency evacuation routes. This program is intended to identify areas of concern relating to the ability of emergency personnel to access an area and to evacuate community members safely and efficiently in the event of an emergency.

### **d. City of San Diego Building Regulations**

The City's Building Regulations (SDMC Chapter 14, Article 5, Division 1) are intended to regulate the construction of applicable facilities and encompasses (and formally adopts) associated elements of the CBC. Specifically, this includes regulating the "construction, alteration, replacement, repair, maintenance, moving, removal, demolition, occupancy, and use of any privately owned building or structure or any appurtenances connected or attached to such buildings or structures within this jurisdiction, except work located primarily in a public way, public utility towers and poles, mechanical equipment not specifically regulated in the Building Code, and hydraulic flood control structures." The City's Building Regulations also establish acceptable construction materials for development near open space to minimize fire risk through adoption of Chapter 7, "Fire Resistance-Rated Construction," and Chapter 7A, "Materials and Construction Methods for Exterior Wildlife Exposure," of the CBC (SDMC Chapter 14, Article 5, Division 7).

### **e. Brush Management Regulations**

The City's Brush Management Regulations (SDMC Section 142.0412) are intended to minimize wildland fire hazards through prevention activities and programs. These regulations require the provision of mandatory setbacks, irrigation systems, regulated planting areas, and plant maintenance in specific zones, and are implemented at the project level through the grading and building permit process.

Brush management is required in all base zones on publicly- or privately-owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. The City requires Brush Management Plans for all new development, which are intended to reduce the risk of significant loss, injury, or death involving wildland fires. Unless otherwise approved by the City Fire Marshal, the brush management plans for all future development would consist of two separate and distinct zones as follows:

1. **Zone One** consists of the area adjacent to structures where flammable materials would be minimized through the use of pavement and/or permanently irrigated ornamental landscape plantings. This zone is not allowed on slopes with a gradient greater than 4:1.
2. **Zone Two** consists of the area between Zone One and any area of native or non-irrigated vegetation and consists of thinned native or naturalized vegetation.

## f. City of San Diego General Plan

Multiple elements of the City of San Diego's General Plan address evacuation and wildfire safety and risk. The General Plan provides policies for protecting communities from unreasonable risk of wildfire. Applicable General Plan policies, including new and/or updated policy language applicable to wildfire include the following.

The **Land Use and Community Planning Element** (Land Use Element) provides policies to guide the City's growth and implement the City of Villages strategy within the context of the City's community planning program.

- **Policy LU-C.2.a.5** supports the designation of land uses with careful consideration to fire evacuation routes in accordance with Section D: Fire-Rescue of the Public Facilities, Safety and Services Element.

The **Urban Design Element** establishes goals and policies for the pattern and scale of development and the character of the built environment. The following policies found in the Urban Design Element are relevant to the project:

- **Policy UD-A.3.h:** Use building and landscape materials that blend with and do not create visual or other conflicts with the natural environment in instances where new buildings abut natural areas. This guideline must be balanced with a need to clear natural plants for fire protection to ensure public safety in some areas.
- **Policy UD-A.3.p:** Design structures to be ignition and fire-resistant in fire prone areas or at-risk areas as appropriate. Incorporate fire-resistant exterior building materials and architectural design features to minimize the risk of structure damage or loss due to wildfires.

The **Public Facilities, Services and Safety Element** includes plans, programs, and regulations to protect communities from unreasonable risk of wildfire. These include the Fire Hazard Severity Zone Maps from CAL FIRE that have been adopted under SDMC §55.9401 and §145.0703(a)(2), emergency evacuation procedures as defined in the City Emergency Operations Plan, SDPD Policy and Procedures, Operational Area Emergency Plan, and the California Master Mutual Aid Agreement.

Additionally, the City's Brush Management Regulations, the every-5-year survey of constrained parcels lacking a secondary evacuation route, fire access roads policy, in addition to emergency preparedness education are active programs implemented to reduce wildfire risk.

Applicable policies included in the proposed updated elements related to fire protection and evacuation throughout the City include the following:

- **Policy PF-D.12:** Protect communities from unreasonable risk of wildfire within very high fire hazard severity zones.
  - a. Assess site constraints when considering land use designations near wildlands to avoid or minimize wildfire hazards as part of a community plan update or amendment. (see also LU-C.2.a.4)
  - b. Identify building and site design methods or other methods to minimize damage if new structures are located in very high fire hazard severity zones on undeveloped land and when rebuilding after a fire.
  - c. Require ongoing brush management to minimize the risk of structural damage or loss due to wildfires.
  - d. Provide and maintain water supply systems to supplies for structural fire suppression.
  - e. Provide adequate fire protection. (see also PF-D.1 and PF-D.2 [analyzed in Public Services and Utilities in Section 5.13]).
- **Policy PF-D.13:** Incorporate fire safe design into development within very high fire hazard severity zones to have fire-resistant building and site design, materials, and landscaping as part of the development review process.
  - a. Ensure consistency with local and state building regulations for fire safety and defensible space.
  - ~~a-b.~~ Locate, design and construct development to provide adequate defensibility and minimize the risk of structural loss from wildland fires.
  - ~~b-c.~~ Design development on hillsides and canyons to reduce the increased risk of fires from topography features (i.e., steep slopes, ridge saddles).
  - ~~c-d.~~ Minimize flammable vegetation and implement brush management best practices in accordance with the Land Development Code.
  - ~~d-e.~~ Design and maintain public and private streets for adequate fire apparatus vehicles access (ingress and egress), and install visible street signs and necessary water supply and flow for structural fire suppression.
  - ~~e-f.~~ Coordinate with the Fire-Rescue Department to provide and maintain adequate fire breaks where feasible, or identify other methods to slow the movement of a wildfire in very high fire hazard severity zones in coordination with Fire-Rescue Department and other applicable local, state, and federal fire protection agencies.
- **Policy PF-D.14:** Implement brush management along City maintained roads in very high fire hazard severity zones adjacent to open space and canyon areas.

- **Policy PF-D.15:** Maintain access for fire apparatus vehicles along public streets in very high fire hazard severity zones for emergency equipment and evacuation.
- **Policy PF-D.16:** Provide wildland fire preparedness education for fire safety advance planning.
- **Policy PF-P.3:** Development and maintain current, integrated, and comprehensive Emergency Operations and Disaster Plans on an annual basis.
  - a. Prepare and maintain a comprehensive multi-modal evacuation plan.

## **g. San Diego County Multi-Jurisdictional Hazard Mitigation Plan**

The County's 2017 Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) was prepared to comply with the Disaster Mitigation Act of 2000 to increase disaster planning funding. The purpose of the County's MJHMP (County of San Diego 2017) is to identify the County's hazards, review and assess past disaster occurrences, estimate the probability of future occurrences, and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and human-made hazards. An important component of the County MJHMP is the Community Emergency Response Team, which educates community members about disaster preparedness and trains them in basic response skills, including fire safety. The MJHMP is intended to educate the public, help serve as a decision-making tool, supplement, and enhance local policies regarding disaster planning, and improve multi-jurisdictional coordination.

The MJHMP identifies hazardous materials and wildfire/structure fire among the top 11 hazards in the City due to the potential loss of life, injuries, and damage to property, as well as the significance in the disruption of services.

## **h San Diego County Emergency Operations Plan**

The 2018 San Diego County Emergency Operations Plan describes a comprehensive emergency management system that provides for a planned response to disaster situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts relating to various emergency situations, identifies components of the Emergency Management Organization, and describes the overall responsibilities for protecting life and property and providing for the overall well-being of the population. The plan also identifies the sources of outside support that might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, state and federal agencies, and the private sector.

## **i. City's Emergency Operations Procedures**

The City's Emergency Operations Procedures is an Administrative Regulation adopted to facilitate effective operations during emergency incidents and disasters and is in accordance with the State of California's Standardized Emergency Management System and the National Incident Management System. The ~~SEMS~~ State of California's Standardized Emergency Management System sets up protocol for the control and coordination of on-scene emergency operations including the designation of an Incident Commander, establish Incident Command Posts, conduct response operations according to departmental protocols and Standardized Emergency Management



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System/National Incident Management System principles, request assistance from other City departments for support as needed, and inform senior City officials as appropriate.

## **j. Very High Fire Hazard Severity Zone Maps – Local Adoption**

California Government Code Section 51175-51189 requires that all local jurisdictions identify very high fire hazard severity zones within their areas of responsibility. Inclusion within these zones is based on vegetation density, slope severity and other relevant factors that contribute to fire severity. In 2023, the City adopted updates to the Very High Fire Hazard Severity Zone maps. SDMC 511.4904 identifies the local adoption of the Very High Fire Hazard Severity Zone maps and Sections 511.4906 and 511.4907 identify the requirements associated with development within these zones. The purpose of this map is to classify lands in accordance with whether a very high fire hazard is present so that public officials are able to identify measures that will retard the rate of fire spread and reduce the intensity of uncontrolled fire through vegetation management and implementation of building standards developed to minimize loss of life, resources, and property.

### **4.18.3 Significance Determination Thresholds**

Thresholds used to evaluate potential impacts related to wildfire are based on applicable criteria in the CEQA Guidelines Appendix G and the City's CEQA Significance Determination Thresholds (2022). The following issue questions are addressed in this section:

- 1) Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?
- 2) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?
- 3) Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?
- 4) Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or result in temporary or ongoing impacts on the environment?
- 5) Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

## 4.18.4 Impact Analysis

### Issue 1 Wildfire Hazards

*Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

As shown in Figures 4.18-1a through 4.18-1e, 4.18-2a through 4.18-2e, and Tables 4.18-1 and 4.18-2, approximately 7,415 acres or approximately 30 percent of the total Climate Smart Village Areas are located in a very high fire hazard severity zone; however, despite the urban characteristics of these areas, the majority of the Climate Smart Village areas have a moderate fire threat based on CAL FIRE mapping that takes into account the availability of fuel and the likelihood of an area burning based on topography, fire history, and climate. As shown in Figure 4.18-3, 153.5 acres or approximately 40 percent, of the Hillcrest FPA area is located in the high fire hazard severity zone. However, as shown in Figure 4.18-4, most of the Hillcrest FPA area has a moderate fire threat.

As shown in Figure 4.18-5 and detailed in Table 4.18-4, approximately 6,836.37 acres, or 78.8 percent, of the University CPU area is located in a very high fire hazard severity zone. As detailed in Table 4.18-5, fire threat within the University CPU area is moderate, with pockets of high, very high, and extreme fire threat.

The risk of wildfire was evaluated during the preparation of the University CPU and Hillcrest FPA consistent with General Plan Policy LU-C.2.a.54. Within the University CPU area, the plan identifies fire hazard as a significant risk in the plan area. The University CPU includes a variety of policies to ensure future build-out is responsive to fire risk:

- 4.2.E Re-vegetate graded slopes adjacent to natural hillsides and canyons with native, drought tolerant, and fire-resistive species to improve drainage conditions, reduce slope erosion and instability, and restore biological diversity.
- 5.6.A Retain native vegetation where feasible and revegetated disturbed areas and open space with native, non- invasive, drought tolerant, and fire-resistive species to improve drainage conditions, reduce slope erosion and instability, and restore biological diversity. New development within or adjacent to the MHPA must comply with the MHPA Land Use Adjacency Guidelines.
- 7.2.A Maintain sufficient fire-rescue and police services to meet demands of continued growth and development in University
- 7.2.B Support the upgrades, modernization of facilities and equipment, and/or expansion of the stations serving University, as necessary, to adequately respond to fires and emergencies.
- 7.10.A Protect neighborhoods from unreasonable risk of wildfire within Very High Fire Hazard Severity zones through the encouragement of responsible brush management by property owners.

- 7.10.B Maintain ongoing brush management within the City-owned public space to minimize the risk of structural damage or loss due to wildfires consistent with encroachment limitations of brush management and Environmentally Sensitive Lands regulations of the Land Development Code.
- 7.10.C Promote wildland fire preparedness including emergency evacuation plans and mapping of routes for residential households.
- 7.10.D Encourage fire resistant building and site design, materials, and landscaping, especially for development within very high fire hazard severity zones. ~~Incorporate fire safe design into development within very high fire hazard severity zones. Fire resistant building and site design, materials, and landscaping should be part of the development review process.~~

Similarly, identification of appropriate land uses within the Hillcrest FPA was evaluated consistent with General Plan Policy LU-C.2.a.4 to ensure wildfire hazards were taken into account. For example, Urban Design Policy UD-1.10 of the Uptown Community Plan would ensure avoidance of exposed under-floor areas, large downhill cantilevers, and/or tall support columns for overhanging areas for both aesthetic and fire safety reasons. Like the Blueprint SD Initiative Climate Smart Village Areas, discussed below, growth in Hillcrest would support compact, urban infill development, avoiding growth that encroaches into new wildfire hazard areas. Additionally, the City has invested in upgraded fire facilities in this area to support anticipated growth with Fire Station 5 being rebuilt in Fiscal Year 2022, Fire Station 8 being expanded in Fiscal Year 2020, and Fire Station 3 being remodeled in Fiscal Year 2021. Over the life of the plan, the SDFD will continue to evaluate upgrades, expansions, and new facilities to maintain the high level of fire protection throughout the community ~~adequate as described in service to the community, consistent with Uptown Policy PF-1.7; and continue to provide routine brush management within the City-owned open space, which exists within the canyon networks in this area of the City, per Additional Uptown Policy Fire Protection policies (PF-2, -1.)~~ support a high level of fire protection throughout the community, particularly in areas adjacent to natural open space, which exists within the canyon networks in this area of the City.

Although the Blueprint SD Initiative would not designate land uses with the current action, it anticipates future CPUs and land use change within wildfire hazard areas. The potential for wildfire hazards was considered in developing the Village Climate Goal Propensity map. Specifically, the modeling to identify the high village propensity areas excluded certain areas that would be associated with high wildfire hazards including conservation and non-development land, government/public land, federal land, and parks (see Appendix B). Development under the Blueprint SD Initiative is specifically designed to occur largely within infill areas in locations proximate to transit and major transportation corridors. While much of the City is in a very high fire hazard severity zone, including some Climate Smart Village Areas, the Blueprint SD Initiative would accommodate anticipated growth in the City in existing urban areas, reducing the potential for increased sprawl development into high fire hazard areas.

Due to the project supporting higher intensity development under the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU, the project could result in higher residential densities in certain locations compared to what would be allowed without the project. Future CPUs or other plan

amendments consistent with the Blueprint SD Initiative may also increase development intensities within wildfire risk areas. While the project would focus development within existing urban settings, many of the City's highly urbanized areas are considered to have high fire risk due to the natural vegetation within the City's canyon networks. However, when considering overall suitability for development in relation to wildfire hazards, the locations identified for future potential growth are the lower risk than high fire risk areas in more suburban settings where development is located near vast expanses of natural vegetation and open space areas. Additionally, within the more urbanized settings, the City has been investing in infrastructure to ensure a high level of fire protection to support both existing and future anticipated growth. Nonetheless, by increasing the number of potential residents within areas subject to fire hazards, this could increase the exposure of people and structures to wildfire. While the project anticipates future development would be focused in urban areas that are generally less prone to wildfire risk than surrounding suburban areas, there would still be wildfire risk particularly in areas near canyons and naturalized vegetation.

Future development that would occur under the project would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations aimed at ensuring the protection of people or structures from potential wildland fire hazards. While implementation of the City's regulatory framework at the project level would typically be sufficient to reduce potentially significant wildfire impacts, at a program level of review and in the absence of project-specific development plans, impacts would be significant.

## Issue 2 Emergency Response and Evacuation

*Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are planning level actions that anticipate future development; however, no specific development is proposed at this time. However, the project anticipates future planning and policy actions may be adopted and future development may proceed consistent with the policy and land use framework established by the project. Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would guide future development in appropriate locations, including supporting higher residential density and mixed-use development, primarily within Blueprint SD Initiative Climate Smart Village Areas. Implementation of the Hillcrest FPA would increase the allowable development intensity and residential density within approximately 380 acres of the Hillcrest and Medical Complex neighborhoods. At buildout, the University CPU would result in an overall community-wide increase of approximately 40,582,000 square feet of planned non-residential floor area and approximately 30,480 additional planned residential units. Increases in residential density and development intensities throughout the project areas would increase population densities, adding to the total number of people that could require evacuation in the event of an emergency. Increases in population in certain areas can add to traffic on local roadways and result in congestion during evacuations, potentially exceeding roadway capacities.

At buildout, the University CPU would result in an overall community-wide increase of approximately 36,800,000 square feet of planned non-residential floor area and approximately 29,000 additional planned residential units. Increases in residential density and development intensities throughout the project areas would increase population densities, adding to the total number of people that could require evacuation in the event of an emergency. Increases in population in certain areas can add to traffic on local roadways and result in congestion during evacuations, potentially exceeding roadway capacities.

Within existing communities, such as the University CPU area, where the existing roadway network is established, increased densities throughout the City could create strain on the capacity of roadways to support effective evacuations. Although the project does not propose changes to the available evacuation routes currently existing or planned in the City, the addition of higher densities throughout the City could result in increases in residents and congestion during evacuations. However, implementation of the University CPU would also improve circulation and mobility for all modes of travel, including emergency vehicles throughout the CPU area. The University CPU has identified dedicated roadway space for transit along several key corridors through the implementation of Sustainable Mobility for Adaptive and Reliable Transportation (SMART) Corridors and Flexible (Flex) Lanes in the University CPU area (see Figure 3-22). SMART Corridors are major arterial roadways that provide access to or between at least two freeways, where mobility improvements are made for transit and other congestion-reducing mobility forms through the repurposing of roadway space. Flex Lanes are re-purposed lanes for transit and/or other congestion-reducing mobility forms; and provide dedicated space for moving people more efficiently through a corridor. These proposed improvements would encourage more people to choose transit as their preferred mode of transportation, which would reduce traffic congestion and improve circulation efficiency. Further, these flexible or transit-only lanes can be utilized as needed for emergency access thereby improving emergency access in the area. The University CPU also includes policies that call for the implementation of Intelligent Transportation Systems (ITS) infrastructure. For example, Policy 3.7B supports utilizing ITS improvements to enhance vehicular operations on roadways and provide real-time travel information for all users and Policy 3.7C supports the implementation of ITS and emerging technologies to help improve public safety, reduce collisions, minimize traffic congestion, maximize parking efficiency, and manage transportation and parking demand to improve environmental awareness and neighborhood quality. As these systems come online, they would further improve the efficiency of the transportation network.

In 2022, the City adopted local amendments to the Fire Code addressing requirements for secondary emergency access. The City requires multiple family residential developments with more than 30 dwelling units located in a SRA or a Very High Fire Hazard Severity Zone to be provided with two separate and approved fire apparatus access roads. Developments of one or two-family dwellings where the number of dwelling units exceeds 30 shall be provided with two separate and approved fire apparatus access roads, with certain exceptions. Through City implementation of these requirements for secondary fire access, adverse impacts related to emergency response resulting from new development is not anticipated.

However, there may be existing conditions within the City that lack the level of secondary emergency access routes that would be required under current regulations. As discussed in Section 4.18.2.3, the

SDFD regularly (on a five-year basis) conducts surveys to identify constrained areas, or areas where residential development of more than 30 units do not have at least two emergency evacuation routes. These surveys are used by the City to assess and plan for improvements that may be needed to improve fire response. Application of the City's existing fire code would prohibit any future development from exacerbating any existing constraint related to development on a dead-end road as specified in SDMC Section 511.8201(f)(5)(2).

Throughout the City and beyond, there are generally adequate emergency evacuation routes through the major interstate system, local highways, and prime arterials within San Diego County. Within Hillcrest, there is access to Interstate (I) 5 via University Avenue and Washington Street, access to State Route (SR) 163 from University Avenue, Washington Street and Robinson Avenue, and access to I-805 to the east via University Avenue or El Cajon Boulevard. Sufficient emergency evacuation routes exist in the event of an emergency.

The University CPU area has a number of transportation corridors that can serve as emergency evacuation routes. Interstate 5 traverses the University CPU area along its western edge in the South and traverses through the central portion of the community as it heads north. I-805 generally forms the eastern boundary of the CPU area while SR-52 forms the southern boundary of the University CPU area. These major evacuation routes are accessible from Regents Road, Genessee Avenue, Governor Drive, Nobel Drive, Gillman Drive/La Jolla Colony Drive, and Sorrento Valley Road. As part of the project, Class II bike lanes are proposed along Governor Drive which would result in the reduction of vehicle lanes from four to two lanes. Although these planned modifications to Governor Drive would reduce lanes, the full width of the existing right of way (including bike lanes) could be used for vehicular evacuation in an emergency as directed by emergency personnel. Emergency-imposed traffic routing could also redirect all traffic to drive in one direction away from a potential hazard or emergency which would provide for adequate evacuation capacity along Governor Drive and other major transportation routes.

In addition to these major transportation routes, the CPU area has access to the Mid-Coast Trolley system. The highest intensity development in the University CPU area is focused around areas with transit access and access to major transportation corridors. In addition to existing transit, there are future transit improvements planned over the planning horizon (see Figure 3-22) Although there are substantial ingress and egress points throughout the community, a key constraint to circulation within the University CPU area is the physical separation between the northern and southern portion of the community due to Rose Canyon and the Amtrak train tracks that physically separates the northern and southern portions of the community. Limited north south connections are available, with Genessee Avenue serving as the main north south connection within the community and I-805 providing a north south connection along the eastern edge of the community via SR-52. The southern portion of the University CPU areas, south of Rose canyon has access to evacuation routes including Regents Road to SR-52 and south to Clairemont Mesa Boulevard, Genessee Avenue in both north and south directions, and Governor Drive east to I-805. Although limited north south connections exist between the University CPU area, there are adequate evacuation routes within the CPU area in the event of an emergency.

As future Community Plan Updates are evaluated for adoption consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity map, the City would consider the adequacy of



emergency evacuation routes. Generally, the location of anticipated development within Climate Smart Village Areas corresponds to areas with ready access to transit and major transportation corridors; therefore, it is anticipated that emergency response routes would be adequate.

The City's Emergency Operations Plan, San Diego Police Department Policy and Procedures, Operational Area Emergency Plan, and the California Master Mutual Aid Agreement dictate who is responsible for an evacuation effort and how regional resources will be requested and coordinated. Evacuation routes in the City include major ground transportation corridors including major interstates, highways, and prime arterials within San Diego County.

As detailed in the Attorney General Guidance (California Office of the Attorney General 2022), a higher density infill project within an already developed area would likely not require the same level of analysis as a new low-density development within the wildland-urban interface and surrounded largely by open space. As the project areas are generally associated with urban areas appropriate for higher-density infill, impacts related to emergency evacuation would not be anticipated. The SDPD is the lead agency for evacuations within the City. During an emergency, the SDPD identifies available and appropriate evacuation routes and coordinates evacuation traffic management with the California Department of Transportation, the California Highway Patrol, the San Diego County Sheriff's Department, other supporting agencies, and jurisdictions. Emergency-imposed traffic routing could redirect all traffic to drive in one direction away from a potential hazard or emergency situation. Per General Plan Policy PF-P.3, the City also develops and maintains current, integrated, and comprehensive Emergency Operations and Disaster Plans on an annual basis, including a comprehensive multi-modal evacuation plan. Modern evacuation response includes use of early warning systems and dissemination of emergency information via radio, television, social media/internet, and Reverse 911 or Alert San Diego. The reverse 911 or Alert San Diego is a regional notification system that sends telephone notifications to residents and businesses within San Diego County that may be in danger of being impacted by an emergency or disaster. The system is used by emergency response personnel to notify homes and businesses at risk, including providing evacuation orders. Mass evacuations and the resulting congestion can usually be avoided through use of precise and focused evacuations enabled through the Reverse 911 or Alert San Diego system. Based on the foregoing information, impacts related to emergency evacuation would be less than significant.

### Issue 3 Pollutants from Wildfire

*Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

As previously described, some of the project areas are located within or adjacent to High and Very High Fire Hazard Severity Zones and most of the City as a moderate or higher risk of wildfire. citywide, the potential for pollutant concentrations from a wildfire ~~wildland fires~~ represents a potential hazard, particularly within areas adjacent to open space or within close proximity to wildland fuels. Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are planning level actions that anticipate future development; however, no specific development is proposed at this time. Future development would be required to comply with the

City's Fire Code, Building Regulations, and Brush Management Regulations to ensure that wildfire risks are not exacerbated. While it is not anticipated that future development would exacerbate wildfire risk, residents may be exposed to pollutant concentrations associated with wildfire and/or the uncontrolled spread of a wildfire. In the absence of project-specific information to evaluate site conditions such as slope and prevailing winds, it is not possible to conclude that the project along with all future development anticipated under the project would not exacerbate wildfire risks. Therefore, at a program level of review, impacts related to exacerbation of wildfire risks resulting in exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire would be significant.

## Issue 4 Infrastructure

*Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or result in temporary or ongoing impacts on the environment?*

The project areas are located within existing built environments that are served by storm-water, sewer, electricity, potable water distribution, and communications systems infrastructure. The project areas are served by major roadways that would not require fuel breaks or other measures to reduce wildfire risk. There are some areas within the project areas that may have existing infrastructure deficiencies and may require capacity improvements to serve future projects implemented under Blueprint SD, the Hillcrest FPA, and the University CPU. As detailed in Section 4.16 of this Program Environmental Impact Report (PEIR), mandatory compliance with City regulations would likely preclude significant environmental impacts associated with future construction and/or improvements to the existing utility infrastructure. However, given that future specific development projects are unknown at this time, it cannot be determined whether the installation of such infrastructure would have the potential to exacerbate fire risk or result in adverse impacts on the environment. Therefore, like the conclusion in Section 4.16 of this PEIR, the physical impacts associated with installation or maintenance of infrastructure and utilities would be significant. Future utility and infrastructure improvements would be required to comply with all applicable City standards; thus, these improvements are not likely to exacerbate fire risk. However, at this programmatic level of review, potential temporary or ongoing impacts to the environment due to the installation or maintenance of infrastructure would be significant.

## Issue 5 Flooding or Landslides

*Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

As detailed in Section 4.9.4 under Issue 32 of this PEIR, impacts related to flooding were found to be significant and unavoidable primarily due to the fact that the proposed project could facilitate and increase development potential within areas that could be subject to flooding hazards, such as the area downstream of the provisionally accredited levee within Mission Valley.

Potential impacts associated with landslides are discussed in Section 4.6.4, under Issue 3, of this PEIR. As discussed, various levels of landslide risk exists throughout the project areas as defined by the City's Seismic Safety Study (2008) (refer to Tables 4.6-3 and 4.6-4).

Implementation of Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are planning level actions that anticipate future development; however, no specific development is proposed at this time. However, the project anticipates future planning and policy actions may be adopted and future development may proceed consistent with the policy and land use framework established by the project. Where future development is proposed in areas with wildfire risk, landslide and/or flooding issues, the potential for the project to exacerbate wildfire risk, resulting downstream flooding or landslides as a result of runoff, post-fire slope instability, or drainage changes could be significant.

As discussed in Section 4.6.4, future development would require implementation of site-specific recommendations provided within a required geotechnical investigation which would ensure individual projects would not increase risks associated with landslides and slope stability.

While future development could be subject to risks associated with downstream flooding or landslides, the existing regulatory framework related to flooding and geologic hazards would minimize potential risks. Although individual developments would typically avoid impacts associated with exposure of people or structures to risk resulting from runoff, post-fire slope instability or drainage changes through required compliance with wildfire related regulations along with compliance with geotechnical and hydrology studies, at a program level of review the significance of impacts cannot be determined. At the time of individual developments, evaluation of site-specific conditions would be required. Therefore, in the absence of project-specific information to inform a detailed analysis, impacts related to exposure of people and/or structures to significant risks because of runoff, post-fire slope instability or drainage changes would be significant.

## Cumulative Impacts

Future development that may occur due to implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would be required to comply with the City's Building Regulations, Fire Code, and Brush Management Regulations to ensure that buildings and their occupants are not exposed to a significant wildfire risk. Additionally, as future CPUs are adopted consistent with the Blueprint SD Initiative policy framework including the Village Climate Goal Propensity maps, additional community specific evaluation would be conducted to identify measures that could be implemented to minimize risk associated with wildfire and emergency evacuation. However, development under the proposed project could result in increased residential densities in certain locations compared to what would be allowed without the project. By increasing the number of potential residents within areas subject to fire hazards, this would result in a significant cumulative impact ~~could contribute to a significant cumulative increase~~ in the exposure of people and structures to wildfire and exposure to pollutant concentrations resulting from wildfire (Issues 1 and 3).

Cumulative impacts related to impairments to an adopted emergency response plan or emergency evacuation plan are not anticipated because of ongoing accessibility to the City's and wider County

road network that combined with comprehensive and ongoing emergency evacuation planning that continually responds to changing conditions, growth, and current needs. Therefore, cumulative impacts related to emergency evaluation would be less than significant (Issue 2).

Although the project areas are served by major roadways, storm-water, sewer, electricity, potable water distribution, and communications systems infrastructure, there are some areas within the project areas that may have existing infrastructure deficiencies and may require capacity improvements to serve future projects. While mandatory compliance with City standards and regulations related to brush management, secondary fire access and fire resistive construction techniques in very high fire hazard areas, cumulative impacts of development are not likely to exacerbate fire risk or result in temporary or ongoing impacts on the environment. However, at this level of programmatic review and without the benefit of project-specific development plans, cumulative impacts associated with storm-water, water distribution, wastewater, and communication systems ~~is considered~~ would be to be significant (Issue 4).

Potential cumulative impacts associated with exposure of people or structures to downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability or drainage changes could occur if multiple development projects were to increase wildfire risk and exposure of people or structures to significant risk within an area, resulting in greater combined impacts ~~than that~~ would be anticipated by an individual project. In the absence of project-specific information to inform a detailed analysis, cumulative impacts related to exposure of people and/or structures to significant risks because of runoff, post-fire slope instability or drainage changes would be significant (Issue 4).

## 4.18.5 Significance of Impacts

### 4.18.5.1 Wildfire Hazards

Implementation of Blueprint SD Initiative, the Hillcrest FPA, and the University CPU are planning level actions that anticipate both future development and future planning level actions that may result in an increase in development intensities including the number of residents located within areas having wildfire risk. The increase in the number of residents located within areas at risk of wildland fires could increase the exposure of people and structures to wildfires and impacts would be significant.

### 4.18.5.2 Emergency Response and Evacuation

Build-out of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would result in higher intensity development within the City, primarily located within Climate Smart Village areas. As growth occurs, it would be focused within urban settings, in areas with an established transportation network. Throughout the City and beyond, there are generally adequate emergency evacuation routes through the major interstate system, local highways, and prime arterials within San Diego County. As growth occurs, the City's would continue to implement its Emergency Operations Plan, SDPD Policy and Procedures, Operational Area Emergency Plan, and the California Master Mutual Aid Agreement to address emergency evacuation. Further, ~~as a~~ future development is implemented in accordance with the Blueprint SD Initiative, the Hillcrest FPA, and the University

CPU, application of the City's existing fire code would prohibit any future development from exacerbating any existing constraint related to development on a ~~dead-end~~ dead-end road as specified in SDMC Section 511.8201(f)(5)(2). Based on the foregoing information, impacts related to emergency evacuation would be less than significant.

### **4.18.5.3 Pollutants from Wildfire**

Future development that would occur under the project would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations to ensure that wildfire risks are not exacerbated. While it is not anticipated that future development would exacerbate wildfire risk, residents may be exposed to pollutant concentrations associated with wildfire and/or the uncontrolled spread of a wildfire. In the absence of project-specific information to evaluate site conditions such as slope and prevailing winds, it is not possible to conclude that the project along with all future development and actions anticipated under the project would not exacerbate wildfire risks. Therefore, at a program level of review, impacts related to exacerbation of wildfire risks resulting in exposure of project occupants to pollutant concentrations from a wildfire or uncontrolled spread of a wildfire would be significant.

### **4.18.5.4 Infrastructure**

There are some areas within the project areas that may have existing infrastructure deficiencies and may require capacity improvements to serve future projects implemented under the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU. Given that future specific development projects are unknown at this time, physical impacts associated with installation of and/or improvements to utilities infrastructure would be significant. Future utility and infrastructure improvements would be required to comply with all applicable City standards; thus, these improvements are not likely to exacerbate fire risk. However, at this programmatic level of review, potential temporary or ongoing impacts to the environment due to the installation or maintenance of infrastructure would be significant.

### **4.18.5.5 Flooding or Landslides**

While the project areas could be subject to risks associated with downstream flooding or landslides, the existing regulatory framework related to flooding and geologic hazards would minimize potential risks. Although individual developments would typically be able to avoid impacts associated with exposure of people or structures to risk resulting from runoff, post-fire slope instability or drainage changes through required compliance with City regulations, at a program level of review the significance of impacts cannot be determined. At the time of individual developments, evaluation of site-specific conditions would be required. Therefore, in the absence of project-specific information to inform a detailed analysis, impacts related to exposure of people and/or structures to significant risks because of runoff, post-fire slope instability or drainage changes would be significant.

## 4.18.6 Mitigation, Monitoring and Reporting

Mitigation measures are provided at the program level to serve as the basis for more specific refinement of future mitigation measures to be developed as specific projects are proposed. Where the mitigation measures refer to City and/or State regulations, these are included due to the regulations including detailed performance standards that serve as mitigation when implemented at the project level. The following mitigation framework provides a program-level framework for reducing significant impacts related to wildfire hazards, emergency response and evacuation, pollutants from wildfire, infrastructure, and flooding or landslides.

### **MM-FIRE-1 Wildfire Policy Compliance for Plan Amendments**

As future Community Plan Updates or other plan amendments are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map, the City shall evaluate the adequacy of evacuation routes, emergency access and fire safety in light of the proposed land use and mobility network. The City plan amendment process shall include a review of consistency with Policy LU-C.2.A.5, Policy UD-A.3.h, Policy UD-A.3.p, Policy PF-D.12, Policy PF-D.13, Policy PF-D.14, Policy PF-D.15, and Policy PF-D.16.

### **MM-FIRE-2 Wildfire Safety Policies and Regulation Compliance**

Future projects shall be required to demonstrate consistency with the City's applicable regulatory and policy framework including:

- The latest update to the Fire Code (SDMC Sections 55.0101 through 55.9401), including requirements for adequate fire access and specifications for when two separate fire apparatus access roads are required.
- The latest update to the City's building regulations (SDMC Chapter 14, Article 5) including acceptable construction materials for development near open space (SDMC Chapter 14, Article 5, Division 7).
- The City's Brush Management Regulations (SDMC Section 142.0412) and Landscape Standards, adopted as part of the Land Development Manual.

For projects with a higher level of wildfire or evacuation risk, as determined by the City, additional analysis demonstrating consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA may be required.

## 4.18.7 Significance after Mitigation

As detailed in MM-FIRE-1, future plan amendments including Community Plan Amendments would undergo a planning level evaluation to ensure plans are updated with consideration to fire safety and evacuation. With implementation of MM-FIRE-1 to future plan amendments proposed for consistency with the Blueprint SD Initiative, impacts related to wildfire hazards would be minimized.



However, at a program level of review and without community specific evaluation completed at this time, impacts related to wildfire hazards, and wildfire hazards related to pollutants from wildfire, infrastructure, and flooding and landslides resulting from future plan amendments proposed consistent with the Blueprint SD Initiative would remain significant after mitigation.

Similarly, as future project-specific development is proposed consistent with the Blueprint SD Initiative, the Hillcrest FPA, and/or the University CPU, the City shall ensure implementation of MM-FIRE-2 to ensure future development is consistent with the City's applicable regulatory and policy framework in place to protect against wildfire hazards. In general, project-level compliance with the City's building code, fire code and brush management regulations, combined with ongoing City implementation of programs to minimize wildfire risk (see Section 4.18.2.3), would ensure impacts related to wildfire would be reduced to less than significant. However, at a program level of review and without project-specific details available for site-specific evaluation, potential impacts cannot be known with certainty. Therefore, impacts related to wildfire hazards and wildfire hazards related to pollutants from wildfire, infrastructure, and flooding and landslides resulting from future development implemented consistent with the Blueprint SD Initiative, the Hillcrest FPA, and/or the University CPU would remain significant after mitigation.

## Chapter 5.0

# Effects Found Not to be Significant

The California Environmental Quality Act (CEQA) Guidelines Section 15128 requires that an Environmental Impact Report (EIR) contain a brief statement disclosing the reasons why various possible significant effects of a project were found not to be significant and therefore were not discussed in detail in the EIR, Environmental Impact Report. This chapter analyzes the environmental issues that are not expected to have a significant impact as a result of implementation of the following key project components:

- The “Blueprint SD Initiative,” which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”) which includes rezones, amendments to the City of San Diego (City’s) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (~~CPU~~) (hereinafter referred to as the “University CPU”), which includes rezones, amendments to the LDC, and associated discretionary actions.

Issues addressed in this chapter include agriculture and forestry resources, mineral resources, and population and housing. A brief discussion of the reasons for these findings is provided below.

## 5.1 Agriculture and Forestry Resources

Farmlands are classified according to soil factors including available water holding capacity, temperature regime, acidity, depth to the water table, electrical conductivity, flooding potential, erosion hazard, permeability, rock content, and rooting depth. There are several classifications of farmland including Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Unique Farmland.

Prime Farmland is land with the best combination of physical and chemical features for the long-term production of agricultural crops. It includes land with Class I and Class II Land Use Capability classifications by the U.S. Department of Agriculture Natural Resource Conservation Service, land which qualifies for a rating of 80 to 100 on the Storie Index, land which supports livestock identified by the Natural Resource Conservation Service, and land meeting certain planting and economic thresholds. Farmland of Statewide Importance is land with a good combination of physical and chemical features for the production of agricultural crops. Unique Farmland is land of lesser quality soils used for production of the state’s leading agricultural cash crops. Farmland of Local Importance is land that a local unit has designated as having local significance; a local designation will take priority over some other classification by the state.

A potential impact to agricultural resources could occur when Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is converted to non-agricultural use. The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide; however, it is anticipated that potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. Implementation of the Blueprint SD Initiative, the Hillcrest FPA, and the University CPU would guide future development in appropriate locations, specifically within urbanized settings where the potential for loss of agricultural and forestry resources is low. Based on the farmland maps prepared by the California Department of Conservation (2016), the majority of the project areas are not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; however, the University CPU area contains approximately 13.27 acres identified as Farmland of Local Importance. The approximately 13.27 acres identified as Farmland of Local Importance is located east of Interstate 805 near Marine Corps Air Station Miramar south of Miramar Road and Nobel Drive and is within an area of undeveloped, sloped land not suitable for agriculture as a portion of the mapped Farmland of Local Importance is within developed land associated with Miramar Road. Furthermore, the Farmland of Local Importance definition is a definition adopted by the County of San Diego that would not be appropriate to land within the incorporated boundaries of the City.

Therefore, no impacts to Prime Farmland, Farmland of Statewide Importance, or Unique Farmland would occur. As stated above, development in accordance with the project is anticipated to be focused within urbanized, developed areas; therefore, the project would not impact areas zoned for agricultural use. There are no lands under a Williamson Act contract. Therefore, there would be no conflict with agricultural zoning or a Williamson Act contract.

The project areas are generally located within an urbanized area. There are no existing forestlands, timberlands, or timberlands-zoned Timberland Production either within the project area or in the immediate vicinity that would conflict with existing zoning or the proposed rezoning. Implementation of the project would not result in the loss of forestland or conversion of forestland to non-forest use. The project area does not contain existing forestland uses or agricultural uses; therefore, implementation of the project would not involve any changes that could result in the conversion of farmland to non-agricultural use or the conversion of forestland to non-forest uses. Therefore, no impact is identified for this issue area.

## 5.2 Mineral Resources

According to the California Geological Survey Open File Report 96-04 (U.S. Geological Survey 1996), areas mapped as Mineral Resource Zone 1, 2, 3, and 4 (MRZ-1 through MRZ-4) have been mapped for the City. MRZ-1 areas are locations in San Diego County that have been identified as having no significant mineral deposits. Areas mapped in MRZ-2 are considered to have significant measured or indicated resources. Areas mapped in MRZ-3 contain mineral deposits that may qualify as mineral resources. MRZ-4 areas are those where geologic information does not rule out either the presence or absence of mineral resources.

The Blueprint SD Initiative's policy and land use framework would apply citywide and future development and associated impacts that follow this framework could occur citywide; however, it is anticipated that potential impacts associated with implementation of the Blueprint SD Initiative are most likely to be concentrated within the Climate Smart Village Areas. Based on a review of referenced data, the Blueprint SD Initiative Climate Smart Village Areas are located within MRZ-1 (approximately 1,467.51 acres), MRZ-2 (approximately 2,2776.16 acres), and MRZ-3 (approximately 20,675.77 acres); the Hillcrest FPA area is all located within MRZ-3 (approximately 379.99 acres); and the University CPU area is located within MRZ-1 (approximately 1,547.33 acres), MRZ-2 (approximately 132.06 acres), MRZ-3 (approximately 6,940.68 acres), and MRZ-4 (approximately 52.57 acres).

Although some project areas are within MRZ-1, MRZ-2, and MRZ-3, the potential for loss of mineral resources is low because the feasibility of a mining operation within a highly developed urban environment is low due to land use conflicts, and there is little undeveloped land available for mining. Therefore, no impact to mineral resources would occur.

### **5.3 Population and Housing**

No adverse impacts to population or housing are anticipated from implementation of the project. As detailed in Section 3.5 and Chapter 6.0, the project is intended to accommodate projected population and housing needs within the City and would not induce unplanned population growth as there is a need for housing to serve projected population levels. Thus, development under the project would not support unplanned population growth. See Chapter 3.0 for additional information. While the project could temporarily displace housing as lands are redeveloped, existing City policies and regulations would ensure that affordable units are not lost, and ultimately, proposed development would replace and increase the supply of housing.

Future construction associated with the project would be associated with a demand for construction trade skills and labor. It is anticipated that this demand would be met by the local labor force within San Diego County or the surrounding areas and would not require the importation of a substantial number of workers that could cause an increased demand for temporary or permanent housing.

It is anticipated that most of the new housing units would be absorbed by existing residents of the San Diego area and would assist in accommodating projected population growth that would occur without the project. The number of additional housing units and the corresponding forecasted number of new residents is not substantial and would contribute to the housing provision goals of the City's General Plan Housing Element by helping to accommodate regional growth projected for the project areas, the City, and the region as a whole. Therefore, the project is not anticipated to result in overall regional population growth, and there would be no population and housing related impacts.

## Chapter 6.0

# Growth Inducement

Pursuant to the California Environmental Quality Act (CEQA) Guidelines Section 15126.2(e), the following growth inducement analysis is required:

Discuss ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects which would remove obstacles to population growth (a major expansion of a wastewater treatment plant might, for example, allow for more construction in service areas). Increases in the population may tax existing community services facilities, requiring construction of new facilities that could cause significant environmental effects. It must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

According to the City of San Diego's (City's) 2022 ~~CEQA~~ California Environmental Quality Act Significance Determination Thresholds, growth inducement "is usually associated with those projects that foster economic or population growth, or the construction of additional housing, either directly or indirectly which may result in the construction of major new infrastructure facilities. Also, a change in land use policy or projects that provide economic stimulus, such as industrial or commercial uses, may induce growth. Accelerated growth may further strain existing community facilities or encourage activities that could significantly affect the surrounding environment." In addition, the Thresholds state that "the analysis must avoid speculation and focus on probable growth patterns or projects."

The City's General Plan Program Environmental Impact Report (2008) notes that "population in San Diego will grow whether or not the Draft General Plan is adopted..." The General Plan incorporates the City of Villages strategy, which notes that a "village" is a place where residential, commercial, employment, and civic uses are present and integrated, and are characterized by compact mixed-use areas that are pedestrian-friendly and linked to the regional transit system (City of San Diego 2008). The project includes an update to the existing General Plan Village Propensity map which defines where development should be focused. The project would include the adoption of a new Village Climate Goal Propensity Map which identifies areas for prioritization of future homes and jobs and forms the basis for defining where future growth is anticipated throughout the City. Based on Government Code Section 65300, the General Plan serves as a comprehensive, long-term plan for physical development of the City and, by definition, is intended to manage and address future growth in the City. Implementation of the Village Climate Goal Propensity Map and the City of Villages strategy relies on the future adoption of land use changes through comprehensive community plan updates evaluated in the context of the updated General Plan, the Village Climate Goal Propensity Map, and this Program Environmental Impact Report.

Increases in density resulting from increased housing and non-residential development intensities within appropriate areas in proximity to transit including within Climate Smart Village Areas, or areas

where the village propensity values range from 7 through 14, could result in the need for the expansion of utilities and public services, as future development occurs. With the proposed project, services will need to expand to keep ratios of personnel to population consistent with General Plan goals; however, this expansion will occur incrementally, allowing the City to adjust over time to the increased demand.

The City's General Plan Housing Element provides the policy framework for future planning decisions and identifies a series of implementation steps to meet the Housing Element's goals, objectives, and policies. Goal 1 is to ensure "the provision of sufficient housing for all income groups to accommodate San Diego's anticipated share of regional growth...that will help meet regional GHG targets by improving transportation and land use coordination and jobs/housing balance, creating more transit oriented, compact and walkable communities, providing more housing capacity for all income levels, and protecting resource areas."

The Housing Element establishes the City's plan to meet the demand of the projected share of the region's housing needs for all income levels over the course of the Housing Element cycle (Current Cycle–2021 through 2029). The Regional Housing Needs Assessment (RHNA) is determined based on forecasted housing needs to plan for projected regional growth and is updated every eight years. A fair share goal is identified for every city within the region, and each city prepares a Housing Element that demonstrates the availability of suitable sites and public facilities to meet the regional share goals.

As detailed in the City's 6<sup>th</sup> Cycle Housing Element, San Diego is projected to add nearly 154,000 jobs between 2012 and 2035 even as the population of senior residents is projected to nearly double, growing from 11 percent to 18 percent of the population. These changes will increase demand for housing across income levels. The current 6<sup>th</sup> RHNA cycle target for the City is 108,036 new units by 2029 (City of San Diego 2021). Because the RHNA targets are set to meet the forecasted housing need, and production has historically been well below this need, the project would expand opportunities to yield higher intensity housing within appropriate areas to help accommodate planned residential growth. Implementation of the [Blueprint SD Initiative and Village Climate Goal Propensity map](#) along with adoption of the University CPU and Hillcrest FPA would facilitate housing, including higher intensity housing, in appropriate locations throughout the City; however, these actions are considered growth accommodating based on the population growth estimates referenced above and in light of regional housing shortages. Therefore, implementation of the project would not be growth inducing.

## 6.1 Blueprint SD Initiative

Implementation of the Village Climate Goal Propensity map is a General Plan implementation strategy to facilitate future Community Plan Updates, Specific Plans, and focused plan amendments that will support the City's realization of its existing housing goals. The Village Climate Goal Propensity map incorporates [the San Diego Association of Government's SANDAG's 2050 regional transportation network](#) and was designed to implement the City's Climate Action Plan (CAP) by locating homes and jobs near high frequency transit, with the goal of supporting a shift in mode share from single occupancy vehicles to other non-vehicular models of travel including walking, biking, and transit. Therefore, the Blueprint SD Initiative is not growth inducing; rather its purpose is



to direct planned growth to appropriate locations to implement existing policies, including: the 2050 Regional Plan, the CAP, and the City's 6<sup>th</sup> Cycle (2021–2029) Housing Element.

## **6.2 Hillcrest Focused Plan Amendment**

Implementation of the Hillcrest FPA was developed to be consistent with the General Plan and the City's CAP by increasing density and mix of uses by locating homes and jobs near high frequency transit, with the goal of supporting a shift in mode share from single occupancy vehicles to other non-vehicular models of travel including walking, biking and transit. Therefore, the Hillcrest FPA is not growth inducing; rather its purpose is to direct planned growth to appropriate locations to implement existing policies, including: the 2050 Regional Plan, the CAP, and the City's 6<sup>th</sup> Cycle (2021–2029) Housing Element.

## **6.3 University Community Plan Update**

Implementation of the University CPU was developed to be consistent with the General Plan and the City's CAP by increasing density and mix of uses by locating homes and jobs near high frequency transit, with the goal of supporting a shift in mode share from single occupancy vehicles to other non-vehicular models of travel including walking, biking and transit. The University CPU is not growth inducing; rather its purpose is to direct planned growth to appropriate locations to implement existing policies, including: the 2050 Regional Plan, the CAP, and the City's 6<sup>th</sup> Cycle (2021–2029) Housing Element.

# Chapter 7.0

## Significant Unavoidable Impacts/Significant Irreversible Environmental Changes

### 7.1 Significant and Unavoidable Impacts

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15126.2(c), any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the Program Environmental Impact Report (PEIR). Significant and unavoidable impacts related to aesthetics, air quality, biological resources, cultural resources, hydrology, noise, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire would occur with implementation of the following key project components:

- The "Blueprint SD Initiative," which includes adoption of a General Plan Amendment and associated discretionary actions.
- The Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the "Hillcrest FPA"), which includes rezones, amendments to the City of San Diego's (City's) Land Development Code (LDC), and associated discretionary actions.
- The University Community Plan Update (CPU) and Local Coastal Plan Update (~~CPU~~) (hereinafter referred to as the "University CPU"), which includes rezones, amendments to the LDC ~~Land Development Code~~, and associated discretionary actions.

The significance of impacts and availability of any feasible mitigation measures is summarized in the Executive Summary Table ES-1. Where feasible, this Program Environmental Impact Report has incorporated mitigation measures (see Chapter 9.0) that would reduce potentially significant impacts; however, the following issue areas would remain significant and unavoidable:

#### 4.1 Aesthetics

- Issue 1 Scenic Vistas (Direct and Cumulative)
- Issue 2 Scenic Highways (Direct and Cumulative)
- Issue 3 Visual Character or Quality of Public Views (Direct and Cumulative)
- Issue 4 Scenic Quality (Direct and Cumulative)
- Issue 5 Light, Glare, or Shade (Direct and Cumulative)

#### 4.2 Air Quality

- Issue 1 Conflicts with Air Quality Plans (Direct and Cumulative)
- Issue 2 Air Quality Standards (Direct and Cumulative)
- Issue 3 Sensitive Receptors (Direct)
- Issue 4 Odors (Direct)

#### **4.3 Biological Resources**

- Issue 1 Sensitive Species (Direct and Cumulative)
- Issue 2 Sensitive Habitats (Direct and Cumulative)
- Issue 3 Wetlands (Direct and Cumulative)

#### **4.4 Cultural Resources**

- Issue 1 Historic Structures, Objects or Sites (Direct and Cumulative)
- Issue 2 Archaeological Resources (Direct and Cumulative)

#### **4.9 Hydrology**

- Issue 3 Inundation – Flood Flows (Direct)

#### **4.11 Noise**

- Issue 1 Ambient Noise Levels (Direct and Cumulative)
- Issue 2 Groundborne Vibration (Direct and Cumulative)

#### **4.12 Public Services**

- Issue 1 Public Facilities – Fire Protection, Police Protection, Schools, Libraries (Direct and Cumulative)

#### **4.13 Recreation**

- Issue 1 Deterioration of Parks and Recreational Facilities (Direct and Cumulative)
- Issue 2 Construction or Expansion of Recreational Facilities (Direct and Cumulative)

#### **4.14 Transportation**

- Issue 2 Vehicle Miles Traveled (Direct and Cumulative)

#### **4.15 Tribal Cultural Resources**

- Issue 1 Tribal Cultural Resources (Direct and Cumulative)

#### **4.16 Utilities and Service Systems**

- Issue 1 New or Expanded Utilities (Direct)
- Issue 3 Adequate Wastewater Capacity (Direct and Cumulative)

#### **4.18 Wildfire**

- Issue 1 Wildfire Hazards (Direct and Cumulative)
- Issue 3 Pollutants from Wildfire (Direct and Cumulative)
- Issue 4 Infrastructure (Direct and Cumulative)
- Issue 5 Flooding or Landslides (Direct and Cumulative)

## 7.2 Significant Irreversible Environmental Impacts

Section 15126.2(d) of the CEQA Guidelines requires an evaluation of the significant irreversible environmental changes which would occur should the proposed project be implemented.

Irreversible changes typically fall into one of three categories:

- Primary impacts such as the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources and cultural resources);
- Primary and secondary impacts such as highway improvements which provide access to previously inaccessible areas; and
- Environmental accidents potentially associated with buildout of the project.

Section 15126.2(d) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of such resources is justified.

Implementation of the project would not result in significant irreversible impacts to agricultural land, energy, mineral resources, or water bodies. For a discussion of energy consumption, refer to Section 4.5 Energy.

Regarding agricultural resources, the project areas are generally located within urbanized settings where the potential for loss of agricultural and forestry resources is low. As discussed in Chapter 5.0, Effects Found Not to be Significant, the approximately 13.27 acres identified as Farmland of Local Importance within the University CPU area is within an area of undeveloped, sloped land. A portion of the mapped Farmland of Local Importance is within developed land associated with Miramar Road. Based on the characteristics of this area of mapped Farmland of Local Importance, this land is not suitable for agriculture. Furthermore, the Farmland of Local Importance definition is a definition adopted by the County of San Diego that would not be appropriate to land within the incorporated boundaries of the City. Thus, no significant irreversible changes would occur.

With respect to biological resources, the project would primarily affect developed areas and if sensitive biological resources are present, future development within the project areas would be required to ~~comply under go a discretionary permit process in accordance with~~ Environmentally Sensitive Lands Regulations, the City's Biology Guidelines, and the provisions of the Multiple Species Conservation Program (MSCP) as necessary. Similarly, future development within the project area that has the potential to impact wetlands would follow the applicable discretionary permit process in accordance with City and wildlife agency regulatory requirements. Project areas located within Multi-Habitat ~~Preservation~~ Planning Area (MHPA) and Vernal Pool Habitat Conservation Plan (VPHCP) preserve would be subject to the Environmentally Sensitive Lands Regulations that would ensure no conflicts would occur in relation to the MSCP Subarea Plan or VPHCP. Additionally, future development adjacent to ~~MHPA Multi-Habitat Preservation Area~~ or VPHCP lands would be subject to the Land Use Adjacency Guidelines in MSCP Subarea Plan Section 1.4.3 and the Avoidance and Minimization Measures in VPHCP Section 5.2.1. Nevertheless, as detailed in Section 4.3, Biological Resources, implementation of the project would have a significant impact on sensitive species, sensitive habitats, and wetlands. At a program level of analysis, it is assumed that at least some of

~~those impacts would be irreversible. Thus, no significant irreversible changes to biological resources would occur.~~ As for mineral resources, the project areas are located within urbanized settings where the potential for loss of mineral deposits due to further development is considered low due to a lack of known mineral resources in the area, and low feasibility of a mining operation within a highly developed urban setting due to land use conflicts. Thus, no significant irreversible changes would occur.

Buildout of the project areas would have significant ~~and unavoidable~~ impacts on historic structures, objects or sites and archaeological resources, as detailed in Section 4.4, Cultural Resources. Buildout of the project areas would also have significant ~~and unavoidable~~ impacts on tribal cultural resources, as detailed in Section 4.15, Tribal Cultural Resources. At a program level of analysis, it is assumed that at least some of those impacts would be irreversible.

With respect to environmental accidents potentially associated with the project, and as further discussed in Section 4.8, Hazards and Hazardous Materials, of this PEIR, potential impacts related to hazardous materials and associated health hazards from implementation of the project would be avoided or reduced to below a level of significance through mandatory conformance with applicable regulatory/industry standards and codes. Regarding wildfire, existing building codes and brush management regulations would be applied for all future development within the project areas and the entire City to ensure buildings and their occupants are not exposed to a significant wildfire risk. ~~However, t~~The increase in the number of residents located within areas at risk of wildland fires and within areas of the City that have limited evacuation routes available could increase the exposure of people and structures to wildfires. As increased density and development occurs in areas with potential wildfire risk, there could be a potential for increases in environmental accidents. However, as discussed in 4.18, Wildfire, of this PEIR, potential impacts related to emergency response and evacuation would be reduced due to early warning systems and Reverse 911 or Alert San Diego utilized by emergency response personnel to manage mass evacuations.

## Chapter 8.0

# Alternatives

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires that an Environmental Impact Report (EIR) compare the effects of a “reasonable range of alternatives” to further avoid or reduce the significant effects of a project. The CEQA Guidelines further specify that the alternatives selected should feasibly attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. The “range of alternatives” is governed by the “rule of reason,” which requires the EIR to set forth only those feasible alternatives necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines “feasible” to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

As discussed in Chapter 4.0, implementation of the project would result in significant and/or cumulative environmental impacts related to aesthetics; air quality; biological resources; cultural resources; hazards and hazardous materials; hydrology; noise; public services; recreation; transportation; Tribal Cultural Resources; utilities and services systems; water quality; and wildfire. In developing the alternatives to be addressed in this chapter, consideration was given regarding their ability to meet the basic objectives of the project and the potential to eliminate or substantially reduce significant environmental impacts as identified in Chapter 4.0 of this Program EIR (PEIR).

The following objectives for the project support the underlying purpose of the project, assist the City of San Diego (City) as lead agency in developing a reasonable range of alternatives to evaluate in this PEIR, and will ultimately aid the lead agency in preparing findings and overriding considerations, if necessary. The specific goals and objectives for the Blueprint SD Initiative (as referred to as the General Plan Refresh), which is an amendment to the General Plan, the University Community Plan Update (CPU) and Local Coastal Plan Update (hereinafter referred to as the “University CPU”), and the Hillcrest Focused Plan Amendment (FPA) to the Uptown Community Plan (hereinafter referred to as the “Hillcrest FPA”) project include the following:

- Provide a policy and land use framework for residential capacity to meet the City’s Regional Housing Needs Allocation targets over the next 20 to 30 years identified in the General Plan Housing Element.
- Provide options for services and amenities, such as shopping and grocery stores, public spaces, and parks and recreation facilities closer to homes so that most daily needs can be met through a short walk, bike, or transit ride.
- Provide housing of all types and for all income levels in a manner that affirmatively furthers fair housing.



- Establish land uses that facilitate transit-oriented, multiple-use villages, districts, and developments within the City's Sustainable Development Areas (SDAs) in line with the General Plan's Village Climate Goal Propensity Map and the Climate Action Plan (CAP).
- Provide affordable and convenient climate-friendly mobility options, such as walking/rolling, biking, and public transit, equitably throughout the City with a focus on areas with the greatest need.
- Plan for land uses that maximize the opportunity for housing near existing and future transit stations and stops identified in the San Diego Association of Governments (SANDAG) San Diego Forward: The 2021 Regional Plan (Regional Plan) and that allow residents, employees, students, and visitors to more safely, conveniently, and enjoyably travel by walking/rolling, biking, or transit in line with the CAP.
- Provide a range of densities that will facilitate denser development in vehicle miles traveled\_(VMT) efficient areas to work towards meeting the greenhouse gas (GHG) reduction targets of the CAP.
- Locate housing and goods/services in select areas near employment centers with convenient transit access to improve the jobs-housing balance, enhance, and strengthen employment areas, promote employment opportunities, and encourage sustainable development consistent with General Plan Refresh (Blueprint SD Initiative) and the CAP.
- Streamline the environmental review process for future planning documents to expedite the implementation of plans that facilitate the development of housing and infrastructure that meets the City's needs and further the CAP goals.

In addition to the overall project objectives, the University CPU Specific Objectives include the following:

- Strengthen the community's role as a major employment center in the City by co-locating biotech and life sciences laboratories with the area's hospitals and other technological offices to create an innovation hub that serves the region.
- Increase affordable housing near biotech jobs and the University of California, San Diego to retain talent within the City and prevent employees and students from leaving the community due to high housing costs and long commute times. Look for opportunities to increase and enhance transportation connections within the community plan area and within the City.

In addition to the overall project objectives, the Hillcrest FPA Specific Objectives include the following:

- Establish and enhance the cultural significance of the Hillcrest FPA area to honor and recognize Hillcrest's role as the historic center of the City's lesbian, gay, bisexual, transgender, queer community.
- Provide opportunities to increase and enhance transportation options, in particular, active transportation networks within the Hillcrest FPA area to create a walkable and active street network.

The alternatives addressed in this PEIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would feasibly accomplish most or all of the basic objectives of the project;
- The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the project.
- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, general plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives necessary to permit a reasoned choice; and
- The requirement of the CEQA Guidelines to consider a "no project" alternative, and to identify an "environmentally superior" alternative in addition to the no project alternative (Section 15126.6[e]).

Based on the criteria described above, this PEIR considers Alternative 1: No Project Alternative, Alternative 2: ~~University CPU and Hillcrest FPA~~ High Density Alternative, Alternative 3: Blueprint SD Initiative Distributed Growth Alternative, and Alternative 4: ~~Blueprint SD Initiative~~ Reduced Density Alternative. A side-by-side comparison of the potential impacts of the alternatives to the impacts identified for the project is provided in Table 8-1.

General descriptions of the characteristics of each of these alternatives, along with a discussion of their ability to reduce significant environmental impacts associated with the project are provided in the following subsections.

Table 8-1 Alternatives Comparison to the Project					
Environmental Issue Area	Project	No Project Alternative	University CPU and Hillcrest FPA High Density Alternative	Blueprint SD Initiative Distributed Growth Alternative	Blueprint SD Initiative Reduced Density Alternative
Aesthetics	S	S (<)	S (>)	S (>)	S (<)
Air Quality	S	S (<)	S (>)	S (>)	S (<)
Biological Resources	S	S (=)	S (=)	S (>)	S (<=)
Cultural Resources	S	S (=)	S (=)	S (=)	S (=)
Energy	LS	LS (>)	LS (<)	LS (>)	LS (>=)
Geology and Soils	LS	LS (=)	LS (=)	LS (=)	LS (=)
Greenhouse Gas Emissions	LS	S (>)	LS (<)	S (>)	S-LS (>)
Hazards and Hazardous Materials	LS	LS (=)	LS (=)	LS (=)	LS (=)
Hydrology	S	S (<=)	S (=)	S (=)	S (<=)
Land Use	LS	S (>)	LS (<=)	LS (>)	LS (>=)
Noise	S	S (<)	S (>)	S (<)	S (<=)
Public Services	S	S (=)	S (=)	S (=)	S (=)
Recreation	S	S (=)	S (=)	S (=)	S (=)
Transportation	S	S (>)	S (<)	S (>)	S (>)
Tribal Cultural Resources	S	S (=)	S (=)	S (=)	S (=)
Utilities and Service Systems	S	S (=)	S (=)	S (=)	S (=)
Water Quality	LS	LS (<=)	LS (=)	LS (=)	LS (<=)
Wildfire	S	S (<=)	S (>=)	S (>)	S (=)

NOTES: S = Significant; LS = Less than Significant; (=) = Impacts the same/similar to the project; (<) = Impacts less than the project; (>) = Impacts greater than the project

## 8.1 No Project Alternative

### 8.1.1 Description

Under the No Project Alternative, the Blueprint SD Initiative, Hillcrest FPA and University CPU, and all associated discretionary actions, would not be adopted and growth would continue to occur in accordance with the adopted General Plan and applicable community plans. The General Plan, University Community Plan, and Hillcrest Uptown Community Plan would not be aligned to the same extent with the latest policy direction from the SANDAG Regional Plan, the City's CAP, the Village Climate Goal Propensity Map, and other major City policy initiatives. The village propensity values identified in the Village Climate Goal Propensity Map serve as a general guide for the City to identify opportunities for future homes and jobs as part of future CPU community plan updates, Specific Plans, and FPA focused plan amendments, with the potential for higher densities and intensities

being assigned to areas with a higher village propensity value. Without the project and associated Village Climate Goal Propensity Map, it is anticipated that new homes and jobs would continue to occur throughout the City, but the development would likely not be as focused within Climate Smart Village Areas, which are areas that have the highest likelihood of encouraging walking/rolling, biking and transit usage compared to driving. Under this alternative, future efforts to update community plans would take longer to complete, as environmental review would not be streamlined, resulting in a slower overall implementation of the General Plan and CAP.

## 8.1.2 Analysis of No Project Alternative

### a. Aesthetics

Development under the No Project Alternative would be required to comply with existing height limits and square footage limitations and would be required to incorporate features that enhance neighborhood character and minimize adverse impacts associated with increased bulk, scale, and height as part of the discretionary review process. Building materials, style, and architectural features would be reviewed to ensure the character of development meets required development standards. While compliance with existing regulations under the No Project Alternative would likely minimize impacts related to scenic vistas and public views and visual character, it cannot be ensured that future development under the No Project Alternative would result in less than significant impacts. Thus, while development under the No Project Alternative related to scenic vistas and views and neighborhood character would be significant, impacts would be reduced compared to development anticipated under the project.

Similar to the project, development under the No Project Alternative could occur in proximity to designated and eligible scenic routes, which could be within the potential scenic viewshed of these scenic routes. Therefore, impacts to scenic views or vistas from a state-designated highway would remain significant, although slightly reduced compared to the project.

While existing protections are in place to preserve the City's canyons and steep slopes, specific development proposals and grading quantities are not known at this time. It is possible that future development under the No Project Alternative could result in substantial landform alteration. Even with future discretionary review for projects that impact Environmentally Sensitive Lands (ESL) defined steep slopes, impacts would be significant, the same as the project.

Under the No Project Alternative, compliance with the City's Land Development Code (LDC) would ensure impacts relative to lighting and glare would be less than significant, the same as the project. Buildout of the No Project Alternative could result in development that could create new sources of substantial shade in the project areas. Future discretionary projects will undergo a project-specific environmental review which could identify additional project features and/or mitigation measures to address potential shade impacts. Although the No Project Alternative would result in less dense development, shade impacts would remain significant, although reduced compared to development anticipated under the project.

## b. Air Quality

Air quality impacts under this alternative would be less than those anticipated under the project. Regarding existing air quality plans, the No Project Alternative would not conflict with the adopted Regional Air Quality Strategy (RAQS) or the State Implementation Plan (SIP), because development intensity under the No Project Alternative would be consistent with projections used by SANDAG in developing the RAQS and SIP. Therefore, impacts associated with consistency with air quality plans would be less than significant and less than the project.

Regarding operational emissions, impacts under the No Project Alternative would be significant, similar to those anticipated under the project. Construction emissions under the No Project Alternative would also be significant, similar to those anticipated under the proposed project as development would still occur throughout the City, just at different density/intensity and in different locations. Similar to the project, impacts to sensitive receptors from construction and operational emissions would occur under both the No Project Alternative and the project, and thus, air quality impacts would be significant for the No Project Alternative, similar to the project.

## c. Biological Resources

Preservation of the region's biological resources has been addressed through the implementation of regional habitat conservation plans. Impacts to biological resources in the City are managed through the adopted Multiple Species Conservation Program (MSCP) Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP), which are incorporated by reference in the City's adopted General Plan. The No Project Alternative would not conflict with these adopted conservation plans; therefore, impacts from conflicting with plans and policies for habitat conservation would be less than significant, the same as the project.

Impacts to biological resources—specifically sensitive species, sensitive habitats, and wetlands—under the project would be significant. While required compliance with the City's ESL regulations in the LDC would largely avoid significant impacts under both the No Project Alternative and the project, it cannot be determined at this program level of review whether all biological resources impacts can be avoided, as it cannot be guaranteed that future projects can avoid or mitigate all impacts without site-specific development details, as individual projects could obtain deviations from the ESL regulations. Thus, impacts to sensitive species and habitats and wetlands would be significant under the No Project Alternative, the same as the project.

Under both the No Project Alternative and the proposed project, impacts to wildlife corridors and nursery sites would be avoided through compliance with the MSCP and compliance with protections afforded to Multi-Habitat Planning Area (MHPA) and MHPA adjacent lands. Therefore, like the project, impacts to sensitive species, sensitive habitats, and wetlands under the No Project Alternative would be significant, and impacts to wildlife corridors and nurseries and conflicts with the MSCP Subarea Plan and the VPHCP would be less than significant.

## d. Cultural Resources

As with the project, future development under the No Project Alternative has the potential to result in significant direct and/or indirect impacts to historical resources. The extent of impacts to historical resources resulting from implementation of the No Project Alternative would be similar to those identified for the project, as the extent and areas of disturbance by development would be generally the same and only the type and/or intensity of planned development capacity would change under the project. As with the project, implementation of the No Project Alternative would result in potentially significant impacts related to historical resources at the program level that would be significant.

Regarding prehistoric and archaeological resources, future development under the No Project Alternative, as with the project, has the potential to result in significant direct and/or indirect impacts to prehistoric and archaeological resources. The extent of impacts to prehistoric and archaeological resources resulting from implementation of the No Project Alternative would be similar to those identified for the project, as the extent and areas of disturbance by development would be generally the same and only the type and/or intensity of allowed development would change under the project.

The California Health and Safety Code<sup>H&SC</sup> provides a process and requirements for the identification and repatriation of collections of human remains or cultural items. With implementation of local, state, and federal regulations, impacts to human remains would be less than significant.

As with the project, implementation of the No Project Alternative would result in potentially significant impacts related to cultural resources at the program level that would be significant.

## e. Energy

As with the project, future projects under the No Project Alternative would be subject to existing building and energy code regulations in place at the time in which they were implemented. However, this alternative would not increase the planned capacity for jobs and housing within the project areas, and could result in less dense housing developments, and accordingly less energy efficient housing.

At this program level of analysis, it is too speculative to quantify the construction-related energy consumption of future development, either in total or by fuel type. There are no known conditions in the project area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, development implemented in accordance with the alternative, like the project, would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects. Impacts would be less than significant.

Buildout under the No Project Alternative would result in higher energy consumption associated with transportation as this alternative would not support alternative modes of travel to the same degree as the project.



The No Project Alternative would result in a less than a significant impact related to conflicts with plans and policies that aim to incentivize energy efficiency; however, this alternative would be less energy efficient than the project as this alternative would not support alternative modes of travel to the same degree as the project.

The No Project Alternative would not achieve the planned densities and transportation infrastructure in the City's General Plan and community plans, and would contain fewer opportunities to reduce wasteful, inefficient, and unnecessary use of energy.

## **f. Geology and Soils**

All future development requiring grading within the City must prepare a site-specific geotechnical investigation and implement site-specific measures to avoid geologic hazards. These regulations and requirements would apply equally to the No Project Alternative and to the project. Geologic hazards include seismic hazards, erosion or loss of topsoil, geologic instability, and expansive soils. Adherence to the San Diego Municipal Code's (SDMC) grading regulations and construction requirements and implementation of the City's geotechnical study requirements would preclude significant impacts related to seismic hazards. Conformance to mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Construction in accordance with existing regulations and implementation of recommendations in the required site-specific geotechnical report would prevent impacts related to geologic instability. Finally, compliance with existing regulations would ensure that impacts associated with expansive soils are reduced to less than significant.

With implementation of recommendations included in site-specific geotechnical investigations required under the California Building Code (CBC) and SDMC, impacts related to geologic hazards would be less than significant under the No Project Alternative and the project.

Impacts to paleontological resources under the No Project Alternative would be less than significant, the same as the project. Future development projects implemented under this alternative could involve excavation of previously undisturbed areas, some of which may contain unique paleontological resources with fossil-bearing potential. Potential impacts to paleontological resources were evaluated in the General Plan PEIR and the analysis concluded that there is a potential for the cumulative loss of paleontological resources throughout the City as the City continues to develop in response to projected population growth. Likewise, development implemented in accordance with future development projects may result in the loss of unique paleontological resources or geologic formations with fossil-bearing potential. Pursuant to Section 142.0151 of the SDMC, all projects must comply with the General Grading Guidelines for Paleontological Resources included in Appendix P of the City's Land Development Manual. These guidelines also include the standard monitoring requirement, should a project meet the threshold for paleontological resource monitoring. This regulation would apply to projects within and outside of the project areas and would ensure that impacts to paleontological resources under this alternative would be less than significant, the same as the project.

## **g. Greenhouse Gas Emissions**

The No Project Alternative would continue the land use patterns of the General Plan, University Community Plan, and Uptown Community Plan, and would not accommodate additional capacity for homes and jobs in transit-oriented, multiple-use villages within the City's SDAs in line with the Village Climate Goal Propensity Map and the City's CAP. As the No Project Alternative would not plan for housing and goods/services near employment centers with convenient transit access to the same extent as the project, the No Project Alternative would not be as VMT efficient as the project, therefore, this alternative would have a greater impact related to conflicts with applicable GHG plans and policies.

This alternative could result in fewer vehicle trips than the project, which could translate into reduced GHG emissions. However, the No Project Alternative would not plan for density in Climate Smart Village Areas to the same extent as the project. Planning for growth in Climate Smart Village Areas is anticipated to result in an overall reduction in GHG emissions when considering planned population growth in the City. Additionally, the transit-oriented development envisioned in the University CPU and Hillcrest FPA would not be implemented in the No Project Alternative. Locating the most intense development in proximity to transit centers enables a greater proportion of the population to benefit from alternative transportation options and would ultimately reduce overall VMT and GHG emissions. Whereas the No Project Alternative GHG emissions would not be significant, this alternative would not support the City in obtaining citywide GHG emissions reduction targets under the CAP, resulting in significant and greater GHG and plan inconsistency impacts than the project due to its inconsistency with the City's CAP.

## **h. Hazards and Hazardous Materials**

Compliance with federal, state, regional, and local health and safety laws and regulations would address potential health and safety impacts under the No Project Alternative, the same as the project. Hazardous materials and waste would be managed and used in accordance with all applicable federal, state, regional, and local laws and regulations, and neither the No Project Alternative nor the proposed project would create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at a contaminated site until a "no further action" clearance letter from the County of San Diego (County) Department of Environmental Health and Quality (DEHQ), or similar determination is issued by the San Diego Fire-Rescue Department (SDFD), California Department of Toxic Substances Control (DTSC), Regional Water Quality Control Board (RWQCB), or other responsible agency.

The alternative would not, on its own accord, increase the likelihood that hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste would occur near schools compared to baseline conditions. Future development implemented in accordance with the alternative would be subject to applicable regulations and industry and code standards and

requirements related to hazardous emissions and the handling of hazardous materials, including as they relate to proximity to schools, therefore impacts related to schools under the No Project Alternative would be less than significant, similar to the project.

Regarding aircraft-related impacts, implementation of the No Project Alternative would be consistent with an adopted Airport Land Use Compatibility Plan (ALUCP) as future development would be required to show compatibility with the requirements of the ALUCPs, the SDMC, and associated Federal Aviation Administration requirements.

Regarding emergency evacuation and response plans, the City and the County Office of Emergency Services (OES) continue to coordinate to update the Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) as hazards, threats, population, and land use, or other factors change to ensure that impacts to emergency response plans are less than significant. Impacts under the project and the alternative would be less than significant.

## **i. Hydrology**

Potential impacts related to hydrology resulting from implementation of the No Project Alternative include downstream flooding, erosion, and sedimentation, and associated changes in drainage patterns. Concerning downstream flooding, all development occurring within the project areas would be subject to drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual, ESL Regulations protecting floodplains, Federal Emergency Management Agency (FEMA) standards, and the City's Storm Water Standards Manual. Under the No Project Alternative, significant impacts associated with mudflow could occur due to development areas near steep slopes and associated mudflow risk that could occur. Additionally, potential riverine flooding impacts would largely be avoided through compliance with the City and federal regulations; however, for project areas protected by the Provisionally Accredited Levee (PAL) in Mission Valley, impacts would remain significant. These significant impacts of the No Project Alternative related to mudflows and flooding in Mission Valley downstream of the PAL would be the same as for the project.

Future projects under the No Project Alternative would be required to comply with the City's drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual, ESL Regulations protecting floodplains, FEMA standards, and the City's Stormwater Standards Manual which would ensure development is designed to avoid drainage impacts due to erosion and siltation, surface run-off, stormwater drainage systems, and flood flows; therefore, impacts would be less than significant.

Impacts related to pollutant release resulting from inundation within the No Project Alternative area are anticipated to be less than significant for most areas due to required compliance with applicable SDMC and FEMA regulations that require protection from flooding. Future development would be required to conform to the City's Flood Mitigation Plan and the SDMC for Development Regulations for Special Flood Hazard Areas (SFHAs) (Section 143.0145 and 143.0146) which would ensure flood hazards and the corresponding risk of release of pollutants due to inundation are minimized. Impacts related to development behind the PAL area are considered significant due to the level of uncertainty regarding this potential flooding impact. Under the No Project Alternative, impacts

related to flooding and inundation would remain significant due to the affected area being subject to development in the existing condition.

## **j. Land Use and Planning**

The No Project Alternative would not implement the project and accordingly would not, to the same extent as the project, plan for increased residential and mixed-use development intensities within areas with a medium to high village propensity value as detailed in Figure 3-1. The land use changes proposed in the University CPU and Hillcrest FPA would not be adopted, and the General Plan land use framework proposed by Blueprint SD Initiative would not be adopted to facilitate increased residential capacity needed to meet the City's Regional Housing Needs Assessment goals identified in the General Plan Housing Element. Citywide per capita VMT would not be reduced to the same extent as the project; and the environmental review process for future planning documents would not be streamlined to expedite the implementation of CPUs~~Community Plan Updates~~, Plan Amendments, and LDC amendments anticipated to implement the Village Climate Goal Propensity map and goals and policies of the General Plan ~~Refresh~~.

Unlike the project, the No Project Alternative would not plan for land uses that maximize the opportunity for housing near existing and future transit stations and stops identified in the SANDAG Regional Plan and that allow residents, employees, students, and visitors to more safely, conveniently, and enjoyably travel by walking/rolling, biking, or transit in line with the CAP. Therefore, while the No Project Alternative would not conflict with existing City plans or policies, it would not take the steps needed to fully achieve the goals of existing City plans or policies including the CAP to the same degree as the proposed project. Conflicts with an adopted Airport Land Use Compatibility Plan (ALUCP) under the No Project Alternative would be similar to the project as future development would be required to comply with applicable Airport Influence Areas and regulations of the Airport Land Use Compatibility Overlay Zone in the LDC. Conflicts with the City's MSCP Subarea Plan and VPHCP under the No Project Alternative would be similar to the proposed project as future development would be required to comply with these conservation plans at the time development is proposed. Impacts related to compliance with plans are less than significant.

Development under the No Project Alternative would not implement the policies as the project described in Section 4.10.4 Issue 1 which would reduce impacts related to division of existing communities. At a program level of review, it is not possible to determine whether future mobility improvements would physically divide an established community under the No Project Alternative, therefore impacts related to division of a community would be significant.

Future projects that propose a potential deviation or variance to the City's development regulations would be required to make findings demonstrating compliance with City policies and regulations. Impacts related to potential deviations or variances would be less than significant and similar to the project.

## **k. Noise**

The No Project Alternative would not plan for increased jobs and housing capacity in the project areas; however, the No Project Alternative could result in development and improvements within

the same areas as the proposed project, with lower densities. Future development implemented under both the No Project Alternative and project would be required to comply with applicable City and state noise regulations including Title 24 Building Code requirements and the City's Noise Ordinance. The noise impacts of the No Project Alternative related to temporary construction noise would be similar to the project, as construction activities under both the No Project Alternative and the project could potentially generate ~~short-term~~short term noise levels in excess of 75 A-weighted decibels hourly equivalent sound level [dB(A)  $L_{eq}$ ] at adjacent noise-sensitive uses. While the City regulates noise associated with construction equipment and activities through its Noise Abatement and Control Ordinance, due to the highly developed nature of the project areas, construction noise could impact sensitive receivers potentially located in proximity to construction sites. Thus, impacts associated with temporary construction noise would be significant and the same under the No Project Alternative as under the project.

Under the No Project Alternative impacts related to general ambient noise levels and traffic-related noise would be significant because it cannot be ensured that these noise impacts could be adequately reduced at a program level of analysis. Thus, impacts related to noise levels under the No Project Alternative would be the same as the project.

The proposed project analysis identified a significant impact related to groundborne vibration impacts due to the potential for future development to occur near existing or planned trolley and rail lines. Similar to the project, the No Project Alternative could result in development adjacent to trolley and rail lines which could expose people and structures to vibration impacts, although the extent of potential exposure would be reduced. Thus, vibration impacts of the No Project Alternative would be significant but reduced compared to the project.

## **I. Public Services**

Existing infrastructure deficiencies exist in various areas throughout the City, and as development occurs, public facility improvements would likely be required to serve the City's growing population. While future facilities would undergo a separate environmental review and would comply with existing regulations at the time to address potential environmental impacts, impacts related to the construction and operation of public facilities would remain significant due to the inability to ensure each future facility would be able to fully mitigate their potential environmental impacts. Thus, impacts related to public services and facilities would be significant under the No Project Alternative, the same as the project.

## **m. Recreation**

~~Existing infrastructure deficiencies exist in various areas throughout the City, and as~~ development occurs over time, public facility improvements would likely be required to serve the City's growing population. While future facilities would undergo a separate environmental review and would comply with existing regulations at the time to address potential environmental impacts, impacts related to the construction and operation of public facilities would remain significant due to the inability to ensure each future facility would be able to fully mitigate their potential environmental impacts. Thus, impacts related to public services and facilities would be significant under the No Project Alternative, the same as the project.

## n. Transportation

Potential impacts related to transportation under the No Project Alternative relate to consistency with City policies, VMT, design features, and emergency access. From a policy perspective, the No Project Alternative would not, to the same extent as the project, plan for land uses that maximize the opportunity for housing and jobs near existing and future transit stations and stops identified in the SANDAG Regional Plan in order to decrease citywide VMT. While impacts of the No Project Alternative related to transportation policy consistency would be less than significant, this alternative would not implement the City's transportation policies to the same degree as the project.

Concerning VMT impacts, the No Project Alternative would not, to the same extent, plan for land uses that maximize the opportunity for housing and jobs near existing and future transit stations and stops identified in the SANDAG Regional Plan to support reductions in VMT. Although the No Project Alternative could result in lesser development intensity and less potential vehicle trips, it would also not support and encourage alternative modes of transport by planning for additional capacity for housing and jobs in the project areas. The No Project Alternative is anticipated to result in residential development in less efficient VMT screening areas (>85 percent region average) than the project due to a lack of planned increased capacity for development in VMT efficient areas (<85 percent region average). Under both the No Project Alternative and the project, development could occur in VMT screening areas that exceed the City's VMT threshold (> 85 percent region average), resulting in a significant VMT impact, which is slightly greater than the project.

Concerning design features, under the No Project Alternative, proposed improvements to roadways or amenities such as bicycle facilities would undergo review and approval by the City Engineer. Adherence to City standards, including the City's Street Design Manual, would ensure that a substantial increase in hazards or incompatible uses would not occur as a result of the No Project Alternative. The No Project Alternative does not include any requirements that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts would be less than significant, the same as the project.

Concerning emergency access, future development allowed under the No Project Alternative would be required to comply with all applicable City codes and policies related to emergency access and would be reviewed by the City Fire Marshal to ensure adequate emergency access. Therefore, impacts related to emergency access would be less than significant, like the project.

## o. Tribal Cultural Resources

Future development under the No Project Alternative, as with the project, has the potential to result in significant direct and/or indirect impacts to Tribal Cultural Resources. The extent of impacts to tribal cultural resources resulting from implementation of the No Project Alternative would be similar to those identified for the project, as the extent and areas of disturbance by development would be generally the same and only the type and/or intensity of allowed development would change under the project.

As with the project, implementation of the No Project Alternative would result in potentially significant impacts related to tribal cultural resources at the program level that would be significant.



## **p. Utilities and Service Systems**

Potential impacts related to public utilities under this alternative relate to water supply, utilities, and solid waste and recycling. From a policy perspective, water supply impacts under this alternative would be less than the anticipated impacts of the project because development densities and intensities would be consistent with water supply planning documents and water supply analysis completed in recent CPU EIRs. The No Project Alternative would not result in densities in excess of what would have been considered in the latest water supply planning document. In contrast, the project would increase capacity for housing and jobs in the project areas, which could result in densities in excess of what would have been considered in the latest water supply planning document. Thus, water supply impacts of the No Project Alternative would be less than the project.

As site-specific information regarding future demand and available wastewater capacity to serve development anticipated under the No Project Alternative is not known at a program level of review, impacts are considered significant.

Mandatory compliance with the SDMC regulations, the City's Sewer Design Guidelines, and Public Utilities Department's Capital Improvement Program Guidelines and Standards would ensure future development under the No Project Alternative is required to demonstrate adequate wastewater facilities and capacity is available to serve the project, or that appropriate infrastructure improvements are constructed concurrent with development to ensure adequate capacity. However, at this program level of review and without project-specific development plans, impacts associated with the construction of utility infrastructure would be significant for future development under both the No Project Alternative and the project.

Concerning utilities, mandatory compliance with City standards for the design, construction, and operation of storm water, water distribution, wastewater, energy, and communications systems infrastructure would likely minimize significant environmental impacts associated with the future construction of and/or improvements to utilities infrastructure, under any alternative. However, at this program level of review and without the benefit of project-specific development plans, both direct and cumulative impacts associated with the construction of storm water, water distribution, wastewater, and communication systems would be significant for any future development, for both the No Project Alternative and the project.

Concerning solid waste and recycling, future development under the No Project Alternative would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region, the same as the project. However, future projects would be required to comply with City regulations regarding solid waste that are intended to divert solid waste from the Miramar Landfill to preserve capacity. Compliance with existing regulations requiring waste diversion would help preserve solid waste capacity. Therefore, impacts of the No Project Alternative associated with solid waste would be less than significant, the same as the project.

## q. Water Quality

Potential impacts related to water quality of the No Project Alternative include water quality impacts, erosion, and sedimentation. However, all future development must comply with all National Pollutant Discharge Elimination System (NPDES) permit requirements, including the development of a storm water pollution prevention plan (SWPPP) if the disturbed area covers one acre or more. Future projects would also be required to follow the City's Storm Water Standards Manual for best management practices (BMPs) for stormwater treatment. New development under the No Project Alternative would be required to implement Low Impact Development (LID) design and storm-water BMPs into the design of future projects to address the potential for the transport of pollutants of concern through either retention or filtration, consistent with the requirements of the Municipal Separate Storm Sewer System (MS4) Permit for the San Diego region and the City's Storm Water Standards Manual. Implementation of Low Impact Development (LID) design and storm-water BMPs would reduce the amount of pollutants transported from the project areas to receiving waters. Thus, with compliance with the existing regulatory framework addressing protection of water quality, impacts would be less than significant for both the No Project Alternative and project.

Concerning groundwater, storm water regulations that encourage infiltration of storm water runoff and protection of water quality would protect the quality of groundwater resources and support infiltration where appropriate. Impacts would be less than significant for both the No Project Alternative and project.

## r. Wildfire

Potential impacts relating to wildfire under the No Project Alternative includes exposure of people or structures to wildfires, impairment of an emergency response plan, pollutants from wildfires, infrastructure, and flooding or landslides. Future development under the No Project Alternative and the project would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations which would ensure that people and structures are protected from potential wildland fire hazards. However, like the project, the No Project Alternative could result in development in areas subject to wildfire risk; however, the No Project Alternative would not plan for the same capacity for jobs and housing within the project areas, and thus, would result in reduced potential exposure of residents to wildfire risk, thus impacts related to exposure to wildfire hazards is significant for the No Project Alternative, similar to the project.

Concerning emergency access, future development allowed under the No Project Alternative would be required to comply with all applicable City codes and policies related to emergency access and would be reviewed by the City Fire Marshal to ensure adequate emergency access. Therefore, impacts related to emergency access would be less than significant, like the project.

Regarding emergency evacuation and response plans, the City and the County OES continue to coordinate to update the MJHMP as hazards, threats, population, and land use, or other factors change to ensure that impacts to emergency response plans are less than significant. Therefore, evacuation impacts under the No Project Alternative are less than significant, similar to the project.

Risk from wildfire and potential exposure of persons to pollutants from wildfire would be significant under both the No Project Alternative and the project, although to a lesser degree under the No Project Alternative due to the potential reduced capacity. Wildfire impacts related to required utility improvements and impacts related to flooding or landslide following a wildfire would be the same (significant) under both the project and the No Project Alternative.

### 8.1.3 Conclusion

The No Project Alternative would not, to the same extent as the project, plan for land uses that maximize the opportunity for housing near existing and future transit stations and stops identified in the SANDAG Regional Plan and that allow residents, employees, students, and visitors to more safely, conveniently, and enjoyably travel by walking/rolling, biking, or transit in line with the CAP. Although the No Project Alternative would allow for development consistent with existing community plans and zoning, this alternative would not plan for the transit-oriented jobs and housing capacity needed to support long-term GHG reduction initiatives including a transition to non-vehicular forms of travel within SDAs-Climate Smart Village Areas and would not support higher densities in proximity to transit to the same extent. This alternative would not assist with achieving the housing needed to meet the City's Regional Housing Needs Assessment targets to the same extent as the project because increases in residential development capacity would not be provided to the same degree as the project in areas where the City is incentivizing growth (e.g., within SDAs and TPAs where the City supports housing streamlining). Planning for higher densities in Climate Smart Village Areas, as the project does, increases the development capacity of the City, which would assist the City in meeting its Regional Housing Needs Assessment targets identified in the General Plan Housing Element, as the higher residential development capacity increases the likelihood of more homes per development project.

The No Project Alternative would do nothing to strengthen the University community's role as a major employment center in the City by co-locating biotech and life sciences laboratories with the area's hospitals and other technological offices to create an innovation hub that serves the region, as the No Project Alternative is a continuation of the adopted University Community Plan and does not include the land use/zoning and policy changes of the University CPU that incentivize this. The No Project Alternative would also do nothing to increase affordable housing in high resource areas as identified by the California Tax Credit Allocation Committee's Resource Opportunity Map within walking and bicycling distance to high frequency transit and near biotech jobs and the University of California, San Diego to retain talent within the City and prevent employees and students from leaving the community due to high housing costs and long commute times as the No Project Alternative is a continuation of the adopted University Community Plan and does not include the land use/zoning and policy changes of the University CPU that incentivize this.

The No Project Alternative would not establish and enhance the cultural significance of the Hillcrest FPA area to honor and recognize Hillcrest's role as the historic center of the City's lesbian, gay, bisexual, transgender, queer community, nor would it provide opportunities to increase and enhance transportation options, in particular, active transportation networks within the Hillcrest FPA area to create a walkable and active street network. The No Project Alternative would also do nothing to increase affordable housing in high resource areas as identified by the California Tax Credit Allocation Committee's Resource Opportunity Map within walking and bicycling distance to high

frequency transit and near medical related jobs near the University of California San Diego Hillcrest Medical Center and Scripps Mercy Hospital.

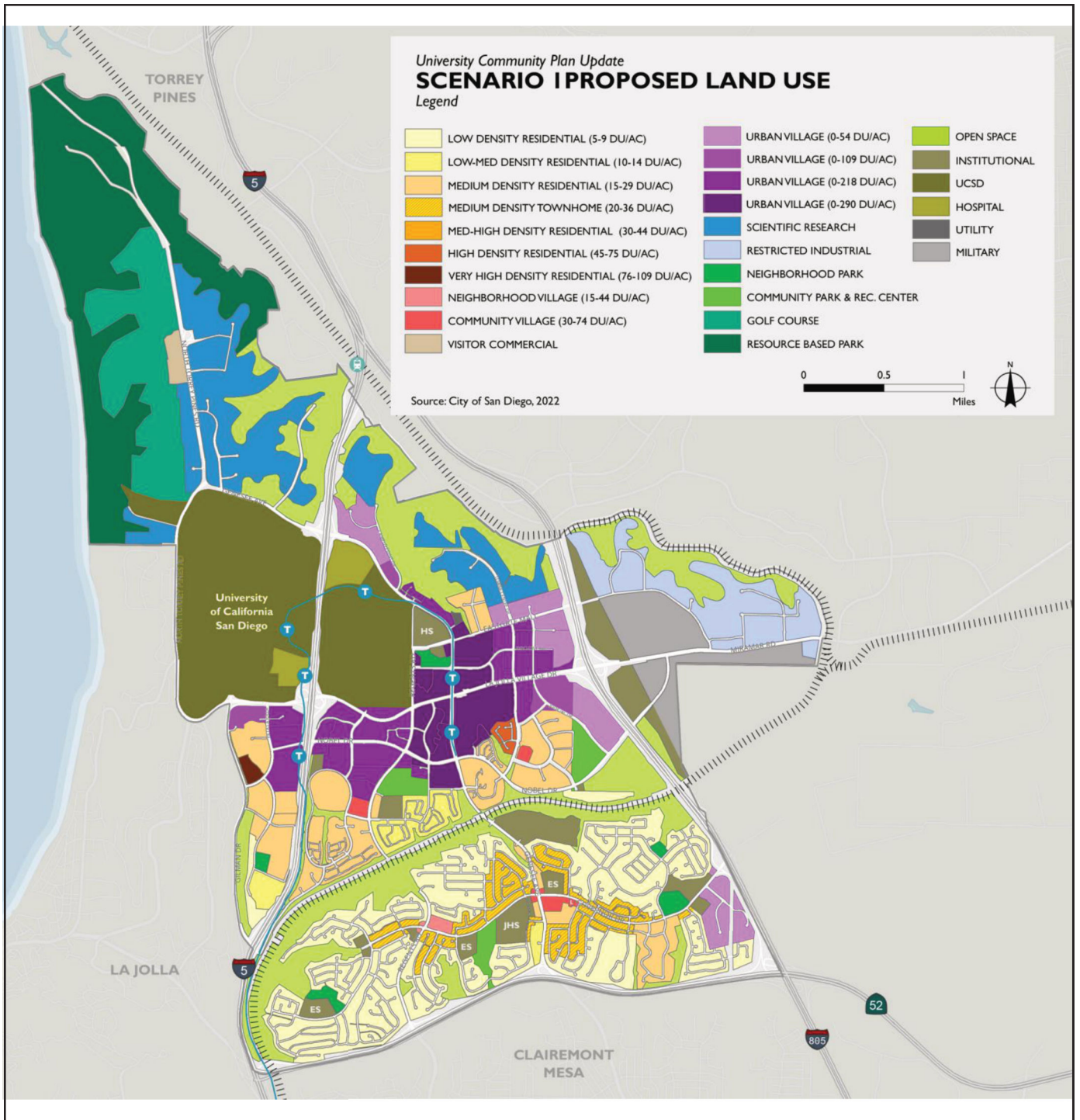
The No Project Alternative would result in reduced impacts compared to the project for the issues of aesthetics, air quality, hydrology and water quality, noise, wildfire, and water quality/aesthetics. However, impacts of the No Project Alternative would be greater than the project for the issues of land use, energy, GHG emissions, and transportation. Overall, the No Project Alternative would achieve the policy objectives of the City's CAP and City of Villages strategy to a lesser extent than the project.

## **8.2 ~~University Community Plan Update and Hillcrest Focused Plan Amendment High Density Alternative~~**

### **8.2.1 Description**

The University CPU and Hillcrest FPA High Density Alternative is a land use alternative that would result in greater non-residential and residential development capacity within areas throughout the City with a village propensity value between 10 and 14, and would result in greater non-residential and residential development capacity in the within corresponding areas within Hillcrest FPA area and the University Towne Centre and Campus/Nobel districts within the University CPU area, these two planning areas. The Blueprint SD Initiative would remain the same as in the project for this alternative. Throughout the areas of the City that have a village propensity value of 10 through 14 as defined by the Village Climate Goal Propensity Map, increases in residential and non-residential development intensities would be achieved through corresponding changes to the base zone development regulations contained in the Municipal Code such as allowing for additional height and Floor Area Ratio (FAR). As the Blueprint SD Initiative provides a planning framework to direct future growth, this alternative would result in a similar planning framework, but would also remove barriers to achieving the highest density uses in these areas through modifications future amendments to the base zone regulations concurrent with future community plan updates. This alternative is expected to remove additional barriers to achieving density within these areas, but would also be expected to result in taller buildings with the potential for additional massing compared to the project. Development potential within the University CPU area and Hillcrest FPA area would increase under this alternative.

Compared to the University CPU's proposed increase in non-residential development capacity, this alternative would accommodate approximately six million more square feet of nonresidential build-out capacity in the University CPU area. Similarly, residential capacity under this alternative would increase, accommodating up to an additional 26,000 new homes compared to the proposed University CPU. Under this alternative, the central core of the University community would include higher density ranges, allowing up to 290 dwelling units per acre within the highest intensity Urban Village designation. This alternative would seek to maximize density in proximity to the Executive Trolley Station, Nobel Trolley Station, and the University Towne Center Transit Center. Refer to Figure 8-1 for a depiction of the University component of this alternative.



**Scenario I Metrics \***

**Jobs**  
150,000

**Homes**  
83,000

**Jobs to Housing Ratio**  
1.81

**FIGURE 8-1**  
 University High-Density Alternative



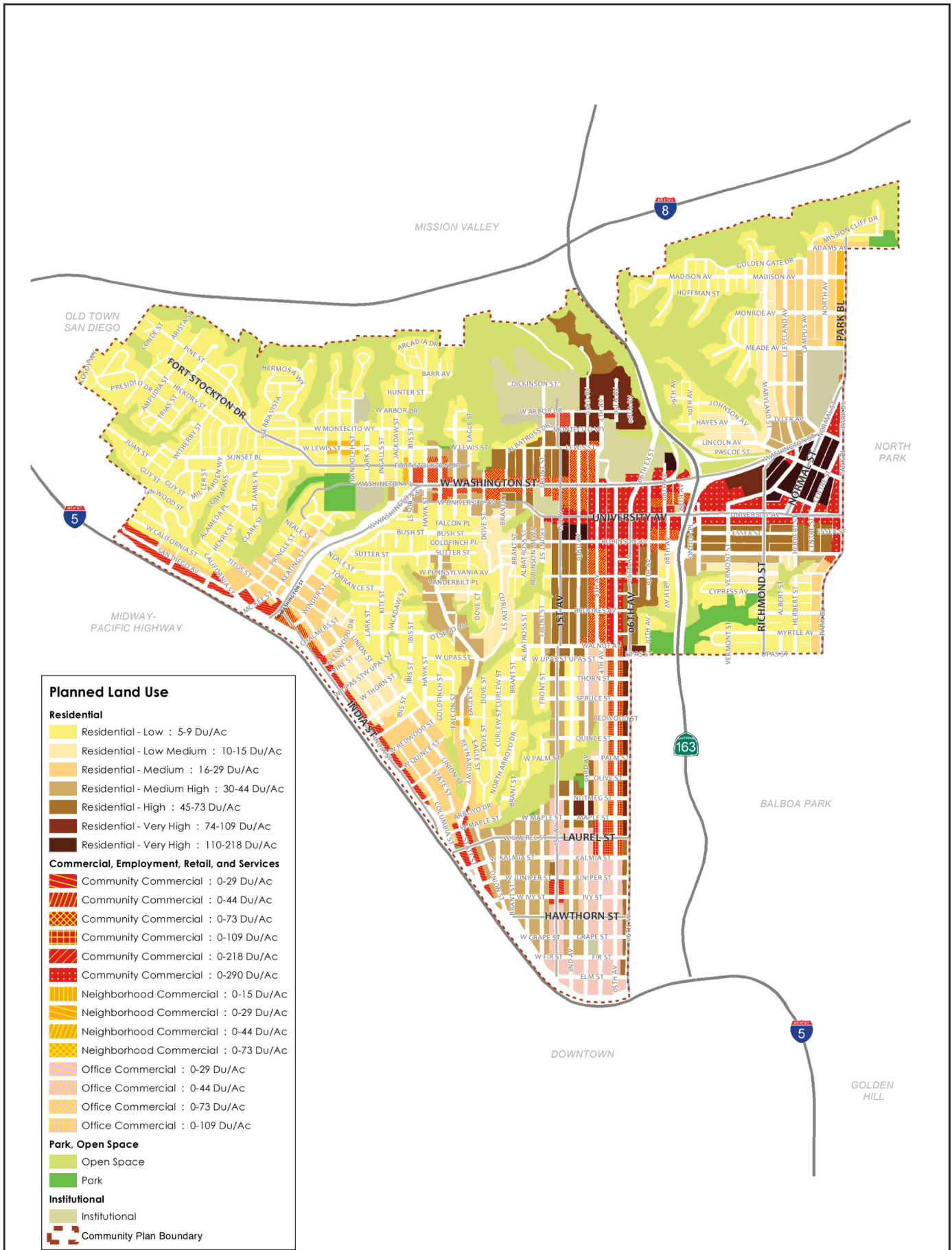


FIGURE 8-2  
High-Density Hillcrest Alternative



Under this alternative, the Hillcrest FPA area would also be designated with higher intensity residential and commercial land use intensities. Refer to Figure 8-2 for a depiction of the proposed land uses that would apply within the Hillcrest FPA. This alternative would accommodate up to approximately 1,000 additional residential dwellings within the Hillcrest FPA. This alternative would include additional homes expanding further along University Avenue at 290 dwelling units per acre and in areas surrounding the central core within the Commercial and Entertainment Activity Boundary. This alternative would seek to maximize density in proximity to the central core to create a walkable, ~~and~~ dense, and transit-oriented environment.

Multiple climate action, housing, bicycle, and public transportation advocacy groups requested that the City analyze a higher density alternative for the University CPU. This alternative includes higher density for not only the University CPU, but also the Blueprint SD Initiative and the Hillcrest FPA. It was selected for consideration as it is feasible, has the potential to reduce significant impacts, and would achieve most of the project objectives.

## **8.2.2 Analysis of University Community Plan and Hillcrest Focused Plan High Density Alternative**

### **a. Aesthetics**

Development associated with implementation of the ~~University and Hillcrest~~ High Density Alternative could adversely impact public scenic vistas or views to a greater extent than the project due to potential additional densities allowed under this alternative. At a program level of review, and without project-specific development plans, impacts associated with scenic vistas and viewsheds would be significant, the same as the project. This impact would be slightly increased compared to the project due to the increase in potential development intensity, massing, and height.

Development under this alternative could occur in proximity to designated and eligible scenic routes and could be within the potential scenic viewshed of these scenic routes. Therefore, impacts to scenic views or vistas from a state-designated highway would remain significant and similar to the project.

Both the project and this alternative would implement the proposed Supplemental Development Regulations (SDRs) for the Community Plan Implementation Overlay Zone (CPIOZ) Type A areas within the Hillcrest FPA area and the University CPU area. With implementation of these SDRs, development would be required to incorporate design features that enhance the visual character and quality of public spaces by including features such as promenades, complete streets, and street trees. Development regulations would also minimize adverse impacts associated with increased bulk, scale, and height. Building materials, style, and architectural features would be reviewed to ensure the development meets required development standards. Notwithstanding these requirements, at a program level of review, and without project-specific development plans, impacts associated with visual character and quality of public views would be significant for both the project and the alternative.

While existing protections are in place to preserve the City's canyons and steep slopes, specific development proposals and grading quantities are not known at this time. It is possible that future

development under the project could result in substantial landform alteration. Even with future discretionary review for projects that impact ESL defined steep slopes, impacts would be significant. Required compliance with the LDC would ensure impacts relative to lighting and glare would be less than significant. Buildout of this alternative could result in development that could create new sources of substantial shade in the project areas. Future discretionary projects will undergo a project-specific environmental review which could identify additional project features and/or mitigation measures to address potential shade impacts. Nevertheless, shade impacts would remain significant and slightly greater compared to the project due to the increase development proposed under this alternative.

## **b. Air Quality**

Air quality impacts under the ~~University Community Plan and Hillcrest Focused Plan~~ High Density Alternative would be similar to the anticipated impacts under the project. Like the project, the ~~University and Hillcrest~~ High Density Alternative would permit development resulting in increased emissions levels compared to those anticipated under the existing land use plans. This alternative would theoretically allow for more dwelling units and vehicle trips than allowed under the proposed project; however, both projects would result in greater density than what was anticipated in developing the RAQS and SIP and, as such, would conflict with implementation of the RAQS and SIP. Therefore, air quality impacts associated with consistency with the RAQS and SIP under this alternative would be significant.

The air quality impacts related to construction emissions would be significant, similar to the project as construction emissions could occur to a similar degree as the project. Under this alternative, operational air quality impacts would result in the same impact conclusions as the project, although due to increased density and trips, impacts would be slightly greater.

Although, implementation of the alternative is not anticipated to create operational-related objectionable odors affecting a substantial number of people within the City; at a program level of review the specific details of individual projects are not known at this time; therefore, impacts related to objectionable odors would be significant. Similarly, because it cannot be known whether projects with stationary source emissions that are near sensitive receptors would be able to reduce emissions below the significance thresholds, this impact would remain significant.

## **c. Biological Resources**

This alternative would result in the same level of biological resources impacts as the project. Implementation of this alternative could result in a potentially significant impact related to sensitive species, sensitive habitats, and wetlands. Pursuant to the ESL Regulations, both ministerial and discretionary projects would be reviewed for the presence of ESL. If the development area is determined to support ESL, the project would be reviewed for consistency with the ESL Regulations, the City's Biology Guidelines, and the provisions of the MSCP and VPHCP. Nevertheless, even with implementation of existing regulatory protections for biological resources, impacts to sensitive species and habitats resulting from future development within the project areas would be significant. Similarly, any project with impacts to wetlands would undergo a discretionary review demonstrating compliance with the City's Biology Guidelines, ESL Regulations, and the MSCP

Subarea Plan; however, at a program level of review it cannot be determined whether impacts could be fully mitigated. Therefore, like the project, impacts to wetlands under this alternative would be significant.

Impacts of this alternative related to wildlife corridors and nursery sites would be less than significant, the same as the project due to the location of development areas within existing urban settings. The location of development under this alternative would not change, only the allowable intensities. Impacts to wildlife corridors and nursery sites would also be avoided through compliance with the MSCP and compliance with protections afforded to MHPA and MHPA adjacent lands. Impacts related to MSCP and VPHCP consistency under this alternative would be less than significant, the same as the project due to required compliance with the ESL Regulations which require that any project located adjacent to the MHPA comply with the MHPA Land Use Adjacency Guidelines, which would ensure potential direct and indirect impacts to sensitive habitats and wildlife species within MHPA would be avoided.

#### **d. Cultural Resources**

As with the project, future development under the ~~Hillcrest and University~~ High Density Alternative has the potential to result in significant direct and/or indirect impacts to cultural resources. While the state and local regulations provide for the protection of designated and potential cultural resources, at a program level of analysis it is impossible to ensure the successful preservation of these resources within the project areas. Thus, potential impacts to cultural resources ~~would be considered significant~~ would be significant, the same as the project.

The California ~~Health and Safety Code~~ H&SC provides a process and requirements for the identification and repatriation of collections of human remains or cultural items. With implementation of local, state, and federal regulations, impacts to human remains would be less than significant.

#### **e. Energy**

As with the project, future projects under the ~~University and Hillcrest~~ High Density Alternative would be subject to existing building and energy code regulations in place at the time in which they are implemented. In addition, this alternative would include an updated mobility framework that incorporates the SANDAG Regional Plan transportation network, which would support increased bicycle, pedestrian, and transit infrastructure and development intensities near these amenities in accordance with the City's CAP goals. Compared to the project, this alternative would result in increased potential development intensities near transit infrastructure, providing transit supportive densities to a greater extent than the project. Both the project and this alternative would provide policies in support of transportation infrastructure and amenities that encourage non-vehicular travel choices; however, transit supportive densities would be achieved to a greater extent for this alternative than for the project.

At this program level of analysis, it is too speculative to quantify the construction-related energy consumption of future development, either in total or by fuel type. There are no known conditions in the project area that would require nonstandard equipment or construction practices that would

increase fuel-energy consumption above typical rates. Therefore, development implemented in accordance with the alternative, like the project, would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects. Impacts would be less than significant.

This alternative would promote a more energy efficient land use pattern and contains opportunities to reduce wasteful, inefficient, and unnecessary use of energy; thus, it would be consistent with plans and policies that aim to incentivize energy efficiency. Impacts related to energy would be less than significant and similar to incrementally reduced compared to the project, as the High Density Alternative includes greater capacity for transit-supporting densities, which would decrease energy use for transportation.

## **f. Geology and Soils**

All future development requiring grading within the City must prepare a site-specific geotechnical investigation and implement site-specific measures to avoid geologic hazards. These regulations and requirements would apply equally to the ~~University and Hillcrest~~ High Density Alternative and to the proposed project. Geologic hazards include seismic hazards, erosion or loss of topsoil, geologic instability, and expansive soils. Adherence to the SDMC grading regulations and construction requirements and implementation of the City's geotechnical study requirements would preclude significant impacts related to seismic hazards. Conformance to mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Construction in accordance with existing regulations and implementation of recommendations in the site-specific geotechnical report would prevent impacts related to geologic instability.

With implementation of recommendations included in site-specific geotechnical investigations required under the CBC and SDMC, impacts related to geologic hazards within the project areas would be less than significant under both the ~~University and Hillcrest~~ High Density Alternative and the project.

Impacts to paleontological resources under the ~~University and Hillcrest~~ High Density Alternative would be less than significant, the same as the project. Future development projects implemented under this alternative could involve excavation of previously undisturbed areas, some of which may contain unique paleontological resources with fossil-bearing potential. Potential impacts to paleontological resources were evaluated in the General Plan PEIR and the analysis concluded that there is a potential for the cumulative loss of paleontological resources throughout the City as the City continues to develop in response to projected population growth. Likewise, development implemented in accordance with future development projects may result in the loss of unique paleontological resources or geologic formations with fossil-bearing potential. Pursuant to Section 142.0151 of the SDMC, all projects must comply with the General Grading Guidelines for Paleontological Resources included in Appendix P of the City's Land Development Manual. These guidelines also include the standard monitoring requirement, should a project meet the threshold for paleontological resource monitoring.

This regulation would apply to projects within and outside of the project areas and would ensure that impacts to paleontological resources under this alternative would be less than significant, the same as the project.

### **g. Greenhouse Gas Emissions**

The increased residential and non-residential development capacity under this alternative could result in greater emissions of GHGs due to greater density and associated vehicle trips; however, this alternative would increase capacity for development intensity to be focused around high quality transit and in locations where the propensity for alternative modes of transportation such as walking/rolling, bicycling, and transit use are high, as compared to single occupancy vehicle use. Overall, this alternative would be consistent with CAP goals because it would focus development intensity within high village propensity areas and support implementation of the Regional Plan transportation network, similar to the project, thereby implementing the City's vision to support alternative modes of transportation that can ultimately reduce GHG emissions. Impacts associated with GHG emissions would be less than significant under the project as well as under the ~~University and Hillcrest~~ High Density Alternative. As detailed in Section 8.2.2.n, the increased densities under this alternative could support higher transit ridership in the long run and decrease citywide VMT per capita compared to the project as this alternative would maximize the opportunity for housing and jobs near existing and future transit stations and stops identified in the SANDAG Regional Plan to support reductions in VMT per capita. Buildout of this alternative could result in greater development intensity and potential vehicle trips; however, it would encourage transit-oriented transit oriented development and support and encourage alternative modes of transport. In turn, this alternative could support further reductions in GHG emissions compared to the project due to potential reductions in vehicle use and emissions. Both this alternative and the project would focus development density near transit and thus both would be VMT efficient as compared to existing conditions. However, due to the potential reductions in VMT per capita under this alternative that could further support GHG emission reductions, impacts Thus, related to GHG emissions and CAP consistency emissions are assumed to be similar to the project. Impacts related to consistency with the CAP would be less than significant and incrementally reduced compared to the project.

### **h. Hazards and Hazardous Materials**

Compliance with federal, state, regional, and local health and safety laws and regulations would address potential health and safety impacts that could occur under the ~~Hillcrest and University~~ High Density Alternative, similar to the project. Hazardous materials and waste would be managed and used in accordance with all applicable federal, state, regional, and local laws and regulations, and the project would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to

occur at a contaminated site until a “no further action” clearance letter from the County DEHQ, or similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency.

The alternative would not, on its own accord, increase the likelihood that hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste would occur near schools compared to baseline conditions. Future development implemented in accordance with the alternative would be subject to applicable regulations and industry and code standards and requirements related to hazardous emissions and the handling of hazardous materials, including as they relate to proximity to schools, therefore impacts related to schools under the alternative would be less than significant, similar to the project.

Regarding emergency evacuation and response plans, the City and the County OES continue to coordinate to update the MJHMP as hazards, threats, population, and land use, or other factors change to ensure that impacts to emergency response plans are less than significant. Impacts from hazards and hazardous materials would be similar and less than significant for this alternative and the project.

## **i. Hydrology**

Potential impacts related to hydrology under the ~~Hillcrest and University~~ Hillcrest and University High Density Alternative include downstream flooding, erosion, and sedimentation.

Future projects under the alternative would be required to comply with the City’s drainage and floodplain regulations in the SDMC and would be required to adhere to the City’s Drainage Design Manual, ESL Regulations protecting floodplains, FEMA standards, and the City’s Stormwater Standards Manual which would ensure development is designed to avoid drainage impacts due to erosion and siltation, surface run-off, stormwater drainage systems, and flood flows; -therefore, impacts would be less than significant.

Impacts related to pollutant release resulting from inundation within the alternative area are anticipated to be less than significant for most areas due to required compliance with applicable SDMC and FEMA regulations that require protection from flooding. Future development would be required to conform to the City’s Flood Mitigation Plan and the SDMC for Development Regulations for SFHAs (Section 143.0145 and 143.0146) which would ensure flood hazards and the corresponding risk of release of pollutants due to inundation are minimized. Impacts related to development behind the PAL area are considered significant due to the level of uncertainty regarding this potential flooding impact. Under the alternative, impacts related to flooding and inundation would still be significant in the same areas as under the project where there is existing development in flood inundation zones.

## **j. Land Use and Planning**

The ~~University Community Plan and Hillcrest Focused Plan~~ University Community Plan and Hillcrest Focused Plan High Density Alternative would increase residential and non-residential development intensities citywide within areas with a village propensity value of 10 through 14, the University CPU area in proximity to the Executive Trolley



to the Executive Trolley Station, Nobel Trolley Station, and the University Towne Center Transit Center and would increase development intensities in Hillcrest compared to the project.

This alternative would result in a less than significant impact related to consistency with the ESL Regulations, the same as the project, as existing procedures are in place to ensure compliance with the ESL Regulations. Both the project and this alternative would be consistent with the California Coastal Act. Impacts related to conflicts with an adopted ALUCP would be less than significant, the same as the project as all applicable safety provisions of the ALUCP and Federal Aviation Administration regulations would ensure consistency with ALUCP policies. This alternative would achieve greater consistency with the SANDAG Regional Plan and the City's CAP by increasing allowable development intensities near high quality transit. Impacts related to MSCP and VPHCP consistency would be less than significant and similar to the project as all development would be required to comply with applicable requirements of the respective plans. This alternative's impact in terms of conflicts with plans and policies that aim to focus development within transit rich areas to support reductions in VMT and GHG emissions, supporting CAP consistency would be less than significant, similar to the project impacts.

Development under this alternative would not physically divide an established community as it would still implement the same policies as the project described in Section 4.10.4 Issue 1 therefore impacts would be less than significant.

Future projects that propose a potential deviation or variance to the City's development regulations would be required to make findings demonstrating compliance with City policies and regulations. Impacts related to division of a community and potential deviations or variances would be less than significant and similar to the project.

## **k. Noise**

Noise impacts under this alternative may include increases in traffic-related noise due to higher traffic volumes along local roadways, potential noise impacts to noise-sensitive land uses, increases in construction noise, and potential groundborne noise and vibration impacts due to development adjacent to trolley or rail lines. An increase in traffic-generated noise could result in an increase in ambient noise levels that exceed the City's significance thresholds. Impacts related to ambient noise and traffic-related noise increases would be significant, and slightly increased compared to the project. Impacts related to rail noise would be significant, the same as the project. While it is not anticipated that stationary noise sources associated with this alternative would result in noise exceeding property line limits, at a program level of review it cannot be ensured without site-specific development details and equipment locations which are not available at this time. Thus, impacts related to noise ordinance compliance under this alternative would be significant, the same as the project.

Future development implemented under both the ~~University and Hillcrest~~ High Density Alternative and project would be required to comply with applicable City and state noise regulations including Title 24 Building Code requirements and the City's Noise Ordinance. The temporary construction noise impacts of this alternative would be similar to the project, as construction activities could potentially generate short-term noise levels in excess of 75 dB(A)  $L_{eq}$  at adjacent properties. While

the City regulates noise associated with construction equipment and activities through its Noise Abatement and Control Ordinance, due to the highly developed nature of the project areas with sensitive receivers potentially located in proximity to construction sites, there is the potential for construction to occur that would expose existing sensitive receptors to significant noise levels. Thus, impacts associated with temporary construction noise would be significant and the same under this alternative as under the project.

## I. Public Services

Existing infrastructure deficiencies exist in various areas throughout the City, and as development occurs, public facility improvements (e.g., police, fire, schools, libraries) will likely be required to serve the City's growing population. At the time future facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new facilities. However, as the location and need for potential future facilities cannot be determined at this time, it is unknown what specific impacts may occur. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential facilities would be mitigated to a less than significant level, impacts would be significant, the same as the project.

## m. Recreation

~~Existing recreation deficiencies exist in various areas throughout the City, and as~~ development occurs over time, recreation facility improvements will likely be required to serve the City's growing population. At the time future facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of parks. However, as the location and need for potential future recreational facilities cannot be determined at this time, it is unknown what specific impacts may occur. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential recreational facilities would be mitigated to a less than significant level, impacts would be significant, the same as the project.

## n. Transportation

Like the project, the ~~University and Hillcrest~~ High Density Alternative is intended to facilitate the development of high density, multi-family residential land uses in areas that have existing or planned propensity for walking/rolling, bicycling, and transit use. This alternative would increase densities within the City's high village propensity value areas, adding increased opportunities for density in areas proximate to transit. Implementation of this alternative would provide greater opportunities for housing and jobs near existing and future transit stations and stops identified in the SANDAG Regional Plan compared to the project. Impacts related to transportation policy consistency would be less than significant, but slightly reduced compared to the project.

The increased densities under this alternative could support higher transit ridership in the long run and decrease citywide VMT per capita compared to the project as this alternative would maximize the opportunity for housing and jobs near existing and future transit stations and stops identified in the SANDAG Regional Plan to support reductions in VMT per capita. Buildout of this alternative could

result in greater development intensity and potential vehicle trips; however, it would encourage transit-oriented development and support and encourage alternative modes of transport. Implementation of this alternative is anticipated to result in residential development in greater VMT efficient areas (<85 percent of the regional average); however, at this program level of analysis, it is not feasible to ensure the timing of full implementation of the SANDAG Regional Plan's transportation investments. Thus, impacts would be significant, but slightly reduced compared to the project.

Concerning design features, under this alternative, any proposed improvements to roadways or transportation infrastructure would undergo the same review by the City Engineer as the project. Adherence to City standards, including the City's Street Design Manual, would ensure that a substantial increase in hazards or incompatible uses would not occur, the same as the project. The ~~University and Hillcrest~~ High Density Alternative does not include any requirements that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts would be less than significant under this alternative, the same as the project.

Concerning emergency access, future development allowed under this alternative would be required to comply with all applicable City codes and policies related to emergency access and would be reviewed by the City Fire Marshal to ensure adequate emergency access. Therefore, impacts related to emergency access would be less than significant, like the project.

## **o. Tribal Cultural Resources**

As with the project, future development under the ~~Hillcrest and University~~ High Density Alternative has the potential to result in significant direct and/or indirect impacts to Tribal Cultural Resources. While the state and local regulations provide for the protection of Tribal Cultural Resources, it cannot be ensured that all resource impacts could be avoided. Thus, potential impacts to Tribal Cultural Resources ~~would be considered significant~~would be significant, the same as the project.

## **p. Utilities and Service Systems**

~~Under the University Community Plan and Hillcrest High High Density Alternative, there would be an increase in water demand. As documented in the Complete Communities: Mobility Choices and Housing Solutions PEIR incorporated by reference (see Section 1.6); residential development in the City has not kept pace with the capacity for growth authorized in recent CPUs. Water supply planning documents including the City's Urban Water Management Plan (UWMP) have been updated to account for increased densities approved with recent CPUs. Due to growth not keeping pace with planned capacities, existing water supply planning documents already anticipate an increased level of water demand. In the event the High Density Alternative were to proceed, the proposed densities would be incorporated into the City's UWMP in the next five-year planning cycle. In the interim, water supplies would be sufficient to support this alternative based on existing water demand projections accounting for unrealized growth. ; however, like the project, water supplies are available to support substantial growth in the City considering the low residential unit production that has occurred in the City in comparison to the high densities that have been authorized in recent CPUs and accounted for in water supply projections. Similar to the project, water is anticipated to be available to serve the project and impacts would be less than significant.~~

Mandatory compliance with City standards for the design, construction, and operation of storm water, water distribution, wastewater, energy, and communications systems infrastructure would likely minimize significant environmental impacts associated with the future construction of and/or improvements to utility infrastructure. However, at this program level of review and without the benefit of project-specific development plans, impacts associated with the construction of utility infrastructure would be significant and similar to the project.

As site-specific information regarding future demand and available wastewater capacity to serve development anticipated under the alternative is not known at a program level of review, impacts are considered significant.

Mandatory compliance with the SDMC regulations, the City's Sewer Design Guidelines, and Public Utilities Department's Capital Improvement Program Guidelines and Standards would ensure future development under the alternative is required to demonstrate adequate wastewater facilities and capacity is available to serve the project, or that appropriate infrastructure improvements are constructed concurrent with development to ensure adequate capacity. However, at this program level of review and without project-specific development plans, impacts associated with the construction of utility infrastructure would be significant for future development under both the alternative and the project.

Future development within the project areas would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region. However, future projects would be required to comply with City solid waste regulations to preserve capacity. Compliance with existing regulations requiring waste diversion would help preserve solid waste capacity. Therefore, impacts associated with solid waste would be less than significant, the same as the project.

## **q. Water Quality**

Potential impacts related to water quality under the Hillcrest and University High Density Alternative include water quality impacts, erosion, and sedimentation. However, all future development must comply with all NPDES permit requirements, including the development of a SWPPP if the disturbed area covers one acre or more. Future projects would also be required to follow the City's Storm Water Standards Manual for BMPs for treatment. New development occurring within the project areas would be required to implement LID and storm water BMPs into the design of future projects to address the potential for transport of pollutants of concern through either retention or filtration, consistent with the requirements of the MS4 Permit for the San Diego region and the City's Storm Water Standards Manual. Implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from the project areas to receiving waters. Thus, with compliance with the existing regulatory framework addressing protection of water quality, impacts would be less than significant, the same as the project.

Regarding groundwater, storm water regulations that encourage infiltration of storm water runoff and protection of water quality would protect the quality of groundwater resources and support infiltration where appropriate. Impacts would be less than significant, the same as the project.

## r. Wildfire

Future development that would occur under this alternative would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations aimed at ensuring the protection of people or structures from potential wildland fire hazards. While implementation of and adherence to this regulatory framework would reduce potential wildfire impacts, the increase in the number of residents located within areas at risk of wildland fires could increase the exposure of people and structures to wildfires and impacts would be significant.

Regarding emergency evacuation and response plans, the City and the County OES continue to coordinate to update the MJHMP as hazards, threats, population, and land use, or other factors change to ensure that impacts to emergency response plans are less than significant. Therefore, evacuation impacts under this alternative are less than significant, similar to the project.

Similarly, the potential increase in exposure of people to pollutant concentrations from wildfire would be significant. ~~While these impacts would be significant under the project, they and would be slightly increased similar compared to the project due to the increased densities.~~

Risk from wildfire and potential exposure of persons to pollutants from wildfire would be significant under both the alternative and the project. Wildfire impacts related to required utility improvements and impacts related to flooding or landslide following a wildfire would be the same (significant) under both the project and the alternative.

### 8.2.3 Conclusion

~~The University and Hillcrest High Density Alternative would allow for increased development potential within high village propensity value areas, which could lead to greater densities within areas with a high propensity for walking/rolling, bicycling and transit. These higher density land use plans would be consistent with the SANDAG Regional Plan and CAP by adding density in areas supportive of alternative transportation and associated reductions in VMT and GHG emissions. However, impacts related to noise compatibility would increase due to increased development potential near high volume roadways, increasing potential noise incompatibilities. However, like the project, the University and Hillcrest High Density Alternative is designed to reduce vehicle trips overall in the long term and facilitate a shift to alternative modes. All impact conclusions of this alternative would be the same as the project; however, the less than significant impacts related to land use, GHG emissions, and energy would be reduced slightly under the alternative. The significant impacts related to transportation would remain significant under this alternative but would be slightly reduced. The significant impacts related to air quality, noise, wildfire, and aesthetics would remain significant under this alternative, but impacts would increase slightly.~~

~~While this alternative would achieve the project objectives to the same degree as the project, it was not selected as the project due to unlikelihood that development at the higher intensities would be feasible and actually implemented. No significant impacts of the project would be completely avoided by this alternative and on the balance, impacts would slightly increase compared to the project.~~

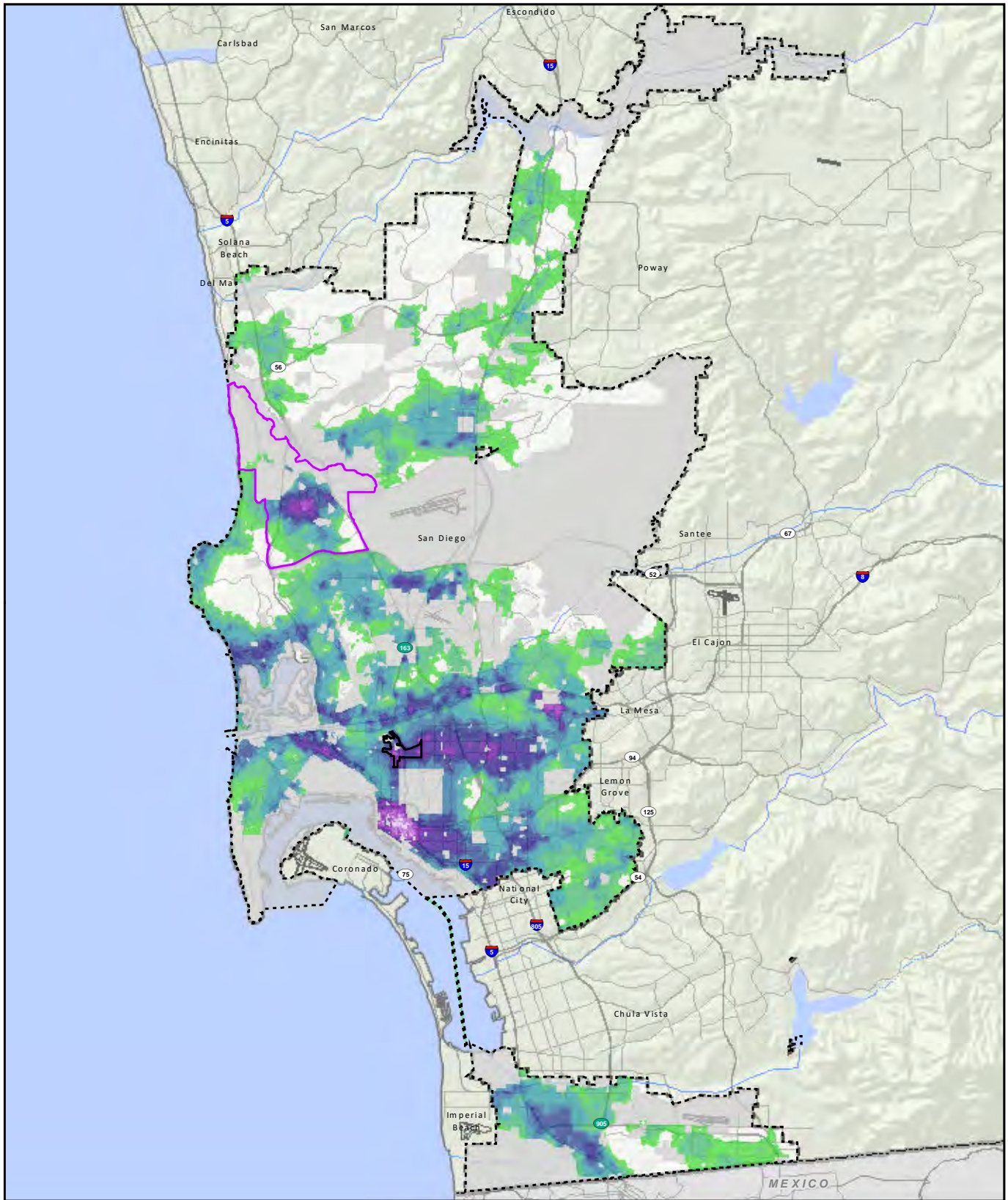
## 8.3 Blueprint SD Initiative Distributed Growth Alternative

### 8.3.1 Description

Under this alternative, the General Plan Land Use and Community Planning Element Figure LU-1 would be amended to support growth within areas with a village propensity value of 4 and above (Figure 8-3). Additional areas throughout the City would be targeted for residential, ~~and~~ mixed-use ~~and job~~ growth, including areas with a lower propensity for alternative modes of transportation such as walking/rolling, biking and transit. While this alternative would not implement a land use framework that accounts for the SANDAG Regional Plan transportation network to the same degree as the project and would not achieve CAP mode share goals to the same degree, the alternative would distribute density more broadly in the City, resulting in ~~lower~~ more distributed development intensity ~~development~~ and reduced building heights within areas with a Village Climate Goal Propensity Value between 7 through 14. The same overall growth projections are assumed under this alternative, but they would be achieved in a more distributed manner. In other words, this alternative would plan for more growth in areas with a village propensity value of 4 through 6 and for lower development maximums within areas with a village propensity value of 7 through 14. Thus, under this alternative, residential and commercial development intensity would be more distributed throughout the City, rather than being focused within levels 7 through 14 where development would most effectively support shifts in mode share toward walking/rolling, transit, and bicycling. In this alternative, the University CPU and Hillcrest FPA proposed land use and policy framework would remain the same as in the proposed project in this alternative and would not be distributed.

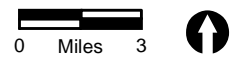
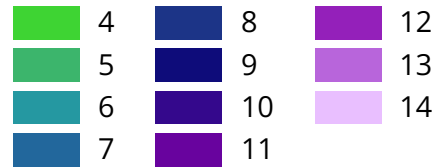
The Blueprint SD Initiative Distributed Growth Alternative would accommodate the same amount of growth as the project, but it would occur in a more distributed manner throughout the City, with the exception of the University CPU and Hillcrest FPA, where proposed land uses would remain the same as in the proposed project. This alternative would not achieve the mode share goals of the CAP to the same degree as the project, and would result in reduced consistency with the General Plan and the CAP. This alternative would distribute growth more widely in areas of the City with less propensity for walking/rolling, bicycling and transit, this could conflict with various General Plan land use and mobility plans and policies that aim to support ~~densification~~ increased density and intensity of uses in areas that would achieve associated VMT efficiencies.





- Hillcrest Focused Plan Amendment Area
- University Community Plan Update Area
- San Diego City Limits
- Exclusion Area

**Village Propensity Value**



**FIGURE 8-3**

**Blueprint SD Distributed Growth Alternative**

## 8.3.2 Analysis of Blueprint SD Initiative Distributed Growth Alternative

### a. Aesthetics

The Blueprint SD Initiative Distributed Growth Alternative would distribute growth throughout the City resulting in lower development intensities (e.g., height and floor area ratio) within the higher village propensity value areas. Densities would be spread throughout the City, thus impacts associated with scenic vistas and viewsheds within the higher village propensity value areas under this alternative would be reduced compared to the project; however, greater densities within areas with a village propensity value of 4 through 6 could increase adverse impacts related to scenic vistas in other areas.

Development under this alternative could occur in proximity to designated and eligible scenic routes and could be within the potential scenic viewshed of these scenic routes. Therefore, impacts to scenic views or vistas from a state-designated highway would remain significant and similar to the project.

Implementation of the policy framework within the General Plan and applicable community plans, as well as required adherence to the existing regulatory framework including, but not limited to, the SDRs Supplemental Development Regulations within Community Plan Implementation Overlay Zones, would ensure that the design of new development would incorporate design features that enhance neighborhood character and minimize adverse impacts associated with increased bulk, scale, and height. Building materials, style, and architectural features would be reviewed to ensure the character of development meets required development standards. Notwithstanding these requirements, at this program level of review, and without project-specific development plans, impacts associated with existing visual character and scenic quality would be significant and similar somewhat reduced compared to the project due to decreased development intensities within Climate Smart Village Areas.

While existing protections are in place to preserve the City's canyons and steep slopes, specific development proposals and grading quantities are not known. It is possible that future development could result in substantial landform alteration. Even with future discretionary review for projects that impact ESL defined steep slopes, impacts would be significant. Required compliance with the LDC would ensure impacts relative to lighting and glare would be less than significant. Buildout of this alternative could result in development that could create new sources of substantial shade in the project areas. Future discretionary projects will undergo a project-specific environmental review which could identify additional project features and/or mitigation measures to address potential shade impacts. Nevertheless, shade impacts would remain significant and similar to the proposed project. Overall impacts related to aesthetics would be similar to the project, although changes in the location of development would affect different areas of the City.

Under the Blueprint SD Initiative Distributed Growth Alternative, as with the proposed project, compliance with the City's LDC would ensure impacts related to lighting and glare would be less than significant. Buildout of this alternative could result in development that could create new sources of

substantial shade in the project areas, although to a lesser extent than the project. Future discretionary projects will undergo a project-specific environmental review which could identify additional project features and/or mitigation measures to address potential shade impacts; however, ministerial projects may not be subject to the same level of evaluation for shade impacts. Shade impacts would remain significant, although reduced compared to the project due to lesser development intensity anticipated.

## **b. Air Quality**

Regarding existing air quality plans, the Blueprint SD Initiative Distributed Growth Alternative would conflict with the adopted RAQS and SIP because development intensity would be greater than the projections used by SANDAG in developing the RAQS and SIP. Therefore, impacts associated with consistency with air quality plans would be significant, the same as the project.

Regarding operational emissions, impacts under the Blueprint SD Initiative Distributed Growth Alternative would spread development throughout the City and would not be focused in high village propensity areas. This could result in higher operational emission overall due to development being provided in less efficient VMT areas where longer vehicle trips would likely be required. At this program level of analysis, impacts related to operational air emission would be significant and slightly increased compared to the project.

Construction emissions under the Blueprint SD Initiative Distributed Growth Alternative would be significant, similar to those anticipated under the project because the same amount of development would be allowed. However, construction would be more dispersed throughout the project areas, which would likely reduce the concentration of construction projects occurring in one location; additionally, the scale of construction projects would likely be reduced due to the reduced development intensities in certain areas compared to the project.

Like the project, impacts under the Blueprint SD Initiative Distributed Growth Alternative associated with sensitive receptors would be significant; however, it would be less under this alternative due to the fact that development emissions would be spread over larger areas compared to the project.

Although, implementation of the alternative is not anticipated to create operational-related objectionable odors affecting a substantial number of people within the City; at a program level of review the specific details of individual projects are not known at this time; therefore, impacts related to objectionable odors would be significant, similar to the project.

## **c. Biological Resources**

The Blueprint SD Initiative Distributed Growth Alternative would result in a similar level of biological resources impacts as the project; however, increased development potential in lower village propensity areas could increase potential impacts to biological resources by distributing growth more widely in the City. Implementation of this alternative could result in a potentially significant impact related to sensitive species, sensitive habitats, and wetlands. Pursuant to the ESL Regulations, projects would be reviewed for the presence of ESL. If the development area is determined to support ESL, the project would be required to demonstrate compliance with ESL

Regulations, the City's Biology Guidelines, and the provisions of the MSCP and VPHCP. Thus, with implementation of existing regulatory protections for biological resources, impacts to sensitive species and habitats resulting from future development within the project areas would typically be able to be reduced to less than significant. However, at a program level of review, impacts of future development are not known and it cannot be determined whether impacts could be fully mitigated. Therefore, impacts to sensitive species, sensitive habitats, and wetlands under this alternative would be significant and slightly increased compared to the project.

Impacts of this alternative related to wildlife corridors and nursery sites would be less than significant, the same as the project due to required compliance with MSCP and VPHCP. Even with expansion of development areas into village propensity areas with a value of four and above, impacts to wildlife corridors and nursery sites would also be avoided through compliance with the MSCP and compliance with protections afforded to MHPA and MHPA adjacent lands. Impacts to wildlife corridors would be less than significant, similar to the project.

Impacts related to MSCP and VPHCP consistency under this alternative would be less than significant, the same as the project due to required compliance with the ESL Regulations which require that any project located adjacent to the MHPA comply with the MHPA Land Use Adjacency Guidelines, which would ensure potential direct and indirect impacts to sensitive habitats and wildlife species within MHPA would be avoided.

#### **d. Cultural Resources**

This alternative has the potential to result in significant direct and/or indirect impacts to cultural resources. The extent of impacts to cultural resources resulting from implementation of this alternative would be similar to those identified for the project.

The extent of impacts to historical resources resulting from implementation of this alternative would be slightly greater than those identified for the project, as the areas of disturbance by development would be greater. Implementation of the alternative would result in potentially significant impacts related to historical resources at the program level that would be significant and slightly greater than the project.

Regarding prehistoric and archaeological resources, future development under this alternative has the potential to result in significant direct and/or indirect impacts to prehistoric and archaeological resources. The extent of impacts to prehistoric and archaeological resources resulting from implementation of this alternative would be slightly greater than those identified for the project, as the areas of disturbance by development would be greater than the project.

The California Health and Safety Code provides a process and requirements for the identification and repatriation of collections of human remains or cultural items. With implementation of local, state, and federal regulations, impacts to human remains would be less than significant for the Blueprint SD Initiative Distributed Growth Alternative, the same as the project.

While the LDC provides for the regulation and protection of designated and potential cultural resources, at a program level of analysis it is impossible to ensure the successful preservation of

these resources within the project areas. Thus, potential impacts to cultural resources ~~would be considered significant~~would be significant, the same as the project.

### **e. Energy**

As with the project, future projects under the Blueprint SD Initiative Distributed Growth Alternative would be subject to existing building and energy code regulations in place at the time in which they were implemented. However, this alternative would not result in a land use pattern focused in high village propensity areas, which could result in increased energy demand related to transportation. This alternative would not support alternative modes of travel to the same degree as the project. This alternative would not achieve the planned densities near transit stops in the City's General Plan and community plans, and would thus contain fewer opportunities to reduce wasteful, inefficient, and unnecessary use of energy, compared to the project.

At this program level of analysis, it is too speculative to quantify the construction-related energy consumption of future development, either in total or by fuel type. There are no known conditions in the project area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, development implemented in accordance with the alternative, like the project, would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects. Impacts would be less than significant.

While the alternative would result in a less than significant impact related to conflicts with plans and policies that aim to incentivize energy efficiency, impacts would be greater than the project.

### **f. Geology and Soils**

Under the Blueprint SD Initiative Distributed Growth Alternative all future development requiring grading within the City would prepare a site-specific geotechnical investigation and implement site-specific measures to avoid geologic hazards. These regulations and requirements would apply equally to the alternative and the project. Geologic hazards include seismic hazards, erosion or loss of topsoil, geologic instability, and expansive soils. Adherence to the SDMC grading regulations and construction requirements and implementation of the City's geotechnical study requirements would preclude significant impacts related to seismic hazards. Conformance to mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Construction in accordance with existing regulations and implementation of recommendations in the site-specific geotechnical report would prevent impacts related to geologic instability.

With implementation of recommendations included in site-specific geotechnical investigations required under the CBC and SDMC, impacts related to geologic hazards would be less than significant under the Blueprint SD Initiative Distributed Growth Alternative, the same as the project.

Impacts to paleontological resources under a Blueprint SD Initiative Distributed Growth Alternative would be less than significant, the same as the project. Future development projects implemented under this alternative could involve excavation of previously undisturbed areas, some of which may

contain unique paleontological resources with fossil-bearing potential. Potential impacts to paleontological resources were evaluated in the General Plan PEIR and the analysis concluded that there is a potential for the cumulative loss of paleontological resources throughout the City as the City continues to develop in response to projected population growth. Likewise, development implemented in accordance with future development projects may result in the loss of unique paleontological resources or geologic formations with fossil-bearing potential. Pursuant to Section 142.0151 of the SDMC, all projects must comply with the General Grading Guidelines for Paleontological Resources included in Appendix P of the City's Land Development Manual. These guidelines also include the standard monitoring requirement, should a project meet the threshold for paleontological resource monitoring.

This regulation would apply to projects within and outside of the future project areas and would ensure that impacts to paleontological resources under this alternative would be less than significant, the same as the project.

### **g. Greenhouse Gas Emissions**

The Blueprint SD Initiative Distributed Growth Alternative would result in the same amount of growth potential; however, the development would be distributed throughout the City. As a result, this alternative could result in a greater amount of emissions of GHGs due to reduced VMT efficiency. Development occurring in less GHG efficient areas would require longer trips. Less development in high village propensity value areas compared to the proposed project would result in less transit supportive density. Overall, this alternative would be less consistent with CAP goals because it would not focus housing in areas that would support a mode shift towards alternative transportation modes. This alternative would not support alternative modes of transportation that can ultimately reduce GHG emissions to the same degree as the project. Impacts associated with GHG emissions would be significant under this alternative as it would not achieve the CAP's policy objectives. Compared to the project's less than significant impacts related to GHG emissions, this alternative would result in a significant impact due to inconsistency with the CAP.

### **h. Hazards and Hazardous Materials**

Compliance with federal, state, regional, and local health and safety laws and regulations would address potential health and safety impacts for the Blueprint SD Initiative Distributed Growth Alternative, the same as the project. Hazardous materials and waste would be managed and used in accordance with all applicable federal, state, regional, and local laws and regulations, and the project would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Therefore, impacts would be less than significant, similar to the project.

In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at a contaminated site until a "no further action" clearance letter from the County DEHQ, or similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency. Therefore, impacts relating to hazardous materials sites and schools would also be less than significant.



Regarding emergency evacuation and response plans, the City and the County OES continue to coordinate to update the MJHMP as hazards, threats, population, and land use, or other factors change to ensure that impacts to emergency response plans are less than significant.

## **i. Hydrology**

Future projects under the Blueprint SD Initiative Distributed Growth Alternative would be required to comply with the City's drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual, ESL Regulations protecting floodplains, FEMA standards, and the City's Stormwater Standards Manual which would ensure development is designed to avoid drainage impacts due to erosion and siltation, surface run-off, stormwater drainage systems, and flood flows; therefore, impacts would be less than significant.

Impacts related to pollutant release resulting from inundation within the Blueprint SD Initiative Distributed Growth Alternative area are anticipated to be less than significant for most areas due to required compliance with applicable SDMC and FEMA regulations that require protection from flooding. Future development would be required to conform to the City's Flood Mitigation Plan and the SDMC for Development Regulations for SFHAs (Section 143.0145 and 143.0146) which would ensure flood hazards and the corresponding risk of release of pollutants due to inundation are minimized. Impacts related to development behind the PAL area are considered significant due to the level of uncertainty regarding this potential flooding impact. Under the Blueprint SD Initiative Distributed Growth Alternative area, impacts related to flooding and inundation would still be significant in the same areas as under the project where there is existing development in flood inundation zones.

## **j. Land Use and Planning**

The Blueprint SD Initiative Distributed Growth Alternative would accommodate the same amount of growth as the project, but it would occur in a more distributed manner throughout the City. This alternative would not implement the City of Villages strategy or the CAP to the same degree as the project since development would not be focused in high village propensity areas, e.g., areas with a village propensity value between 7 and 14. Increases in development would be expanded into levels 4 through 6, with reduced development potential in levels 7 through 14. This alternative would not achieve the mode share goals of the CAP to the same degree as the project, and would result in reduced consistency with the General Plan and the CAP. This alternative, as compared to the project, would have more potential direct and indirect impacts to sensitive habitats and wildlife species within the MHPA. Future development under the Blueprint SD Initiative Distributed Growth Alternative would be located within the ALUCP identified noise contours. However, during the building permit process for new development, overflight notification requirements would apply. Therefore, impacts associated with conflicts with the ALUCP under this alternative would be less than significant, the same as the project.

Development under the Blueprint SD Initiative Distributed Growth Alternative would not physically divide an established community as it would still implement the same policies as the project described in Section 4.10.4 Issue 1 therefore impacts would be less than significant.

No deviations or variances would be proposed as part of this alternative. Future development consistent with the alternative may propose deviations or variances. If findings cannot be supported by the City, the potential deviation or variance would not be approved. Therefore, with application of the City's LDC, physical impacts resulting from potential deviations or variances associated with future development anticipated by the project would be less than significant under the Blueprint SD Initiative Distributed Growth Alternative, similar to the project.

## **k. Noise**

Under Blueprint SD Initiative Distributed Growth Alternative, traffic generated noise would be the same as the project, but the location of trips would shift. This alternative, like the project, could result in an increase in ambient noise levels that could exceed the City's significance thresholds. Thus, at a program level of analysis, impacts related to ambient noise and traffic-related noise would be significant. While project impacts would also be significant, impacts of this alternative would be slightly reduced compared to the project as development would be spread throughout the City as opposed to being focused in high village propensity areas. Impacts related to rail noise and groundbourne vibration would be significant, the same as the project. While it is not anticipated that stationary noise sources associated with this alternative would result in noise exceeding property line limits, at a program level of review it cannot be ensured without site-specific development details and equipment locations which are not available at this time. Thus, impacts would be significant, the same as the project.

Future development implemented under Blueprint SD Initiative Distributed Growth Alternative and proposed project would be required to comply with applicable City and state noise regulations including Title 24 Building Code requirements and the City's Noise Ordinance. The temporary construction noise impacts of this alternative would be similar to the project, as construction activities could potentially generate short-term noise levels in excess of 75 dB(A)  $L_{eq}$  at adjacent properties. While the City regulates noise associated with construction equipment and activities through its Noise Abatement and Control Ordinance, due to the highly developed nature of the area with sensitive receivers potentially located in proximity to construction sites, there is the potential for construction to occur that would expose existing sensitive receptors to significant noise levels. Thus, impacts associated with temporary construction noise would be the same under this alternative as under the project.

Thus, both the project and the Blueprint SD Initiative Distributed Growth Alternative would result in similar significant impacts related to traffic noise exposure, temporary construction noise, and construction vibration impacts.

## **l. Public Services**

Existing infrastructure deficiencies exist in various areas throughout the City, and as development occurs, public facility improvements will likely be required to serve the City's growing population. At the time future facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new facilities. However, as the location and need for potential future facilities cannot be determined at this time, it is unknown what specific

impacts may occur. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential public services and recreational facilities would be mitigated to a less than significant level, impacts would be significant, the same as the project.

### **m. Recreation**

Existing infrastructure deficiencies exist in various areas throughout the City, and as development occurs, public facility improvements will likely be required to serve the City's growing population. At the time future facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new facilities. However, as the location and need for potential future facilities cannot be determined at this time, it is unknown what specific impacts may occur. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential public services and recreational facilities would be mitigated to a less than significant level, impacts would be significant, the same as the project.

### **n. Transportation**

Potential impacts related to transportation and circulation under Blueprint SD Initiative Distributed Growth Alternative relate to consistency with City policies, VMT, emergency access, and design features. From a policy perspective, this alternative would not facilitate the development of homes and jobs in areas with a higher village propensity value to the same extent as the project. Spreading development throughout the City would not facilitate reductions in citywide per capita and per employee VMT. While impacts of the Blueprint SD Initiative Distributed Growth Alternative related to transportation policy consistency would be less than significant, this alternative would not implement the City's transportation policies to the same degree as the project.

This alternative would result in more distributed development citywide which could allow for homes and jobs to occur in less VMT efficient areas (>85 percent region average) compared to the project. VMT impacts would be significant and greater than the project.

Concerning design features, under this alternative, proposed improvements to roadways or amenities such as bicycle facilities would undergo review and approval by the City Engineer. Adherence to City standards, including the City's Street Design Manual, would ensure that a substantial increase in hazards or incompatible uses would not occur as a result of this alternative. The alternative does not include any requirements that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts concerning design features would be less than significant.

Concerning emergency access, future development allowed under this alternative would be required to comply with all applicable City codes and policies related to emergency access and would be reviewed by the City Fire Marshal to ensure adequate emergency access. Therefore, impacts related to emergency access would be less than significant, like the project.

## **o. Tribal Cultural Resources**

The Blueprint SD Initiative Distributed Growth Alternative would result in the same amount of growth potential; however, the development would be distributed throughout the City. While the LDC provides for the regulation and protection of designated and potential Tribal Cultural Resources, at a program level of analysis it is impossible to ensure the successful preservation of these resources within the project areas. This alternative has the potential to result in the same level of significant direct and/or indirect impacts to Tribal Cultural Resources as the project.

## **p. Utilities and Service Systems**

Potential impacts to public utilities under Blueprint SD Initiative Distributed Growth Alternative relate to water supply, utilities, and solid waste and recycling. From a policy perspective, water supply impacts under this alternative would be the same as than the anticipated impacts of the proposed project because the amount of total potential growth would not change. Anticipated densities under this alternative would be in excess of what would have been considered in the latest water supply planning document. However, like the project, water supplies area available to support substantial growth in the City considering the low residential unit production that has occurred in the City in comparison to the high densities that have been authorized in recent CPUs and accounted for in water supply projections. Similar to the project, water is anticipated to be available to serve the project and impacts would be less than significant.

As site-specific information regarding future demand and available wastewater capacity to serve development anticipated under the Blueprint SD Initiative Distributed Growth Alternative is not known at a program level of review, impacts are considered significant.

Mandatory compliance with the SDMC regulations, the City's Sewer Design Guidelines, and Public Utilities Department's Capital Improvement Program Guidelines and Standards would ensure future development under the Blueprint SD Initiative Distributed Growth Alternative is required to demonstrate adequate wastewater facilities and capacity is available to serve the project, or that appropriate infrastructure improvements are constructed concurrent with development to ensure adequate capacity. However, at this program level of review and without project-specific development plans, impacts would be significant, similar to the project.

Concerning utilities, mandatory compliance with City standards for the design, construction, and operation of utilities infrastructure would likely minimize potentially significant environmental impacts associated with the future construction of and/or improvements to utility infrastructure. However, at this program level of review and without the benefit of project-specific development plans, impacts associated with the construction of utility infrastructure utility infrastructure would be significant for future development under both the Blueprint SD Initiative Distributed Growth Alternative and the project.

Concerning solid waste and recycling, future development under the Blueprint SD Initiative Distributed Growth Alternative would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region, the same as the project. Future projects would be required to comply with City regulations regarding

solid waste, which would help divert solid waste from the Miramar Landfill to preserve capacity. Therefore, impacts associated with solid waste would be less than significant.

## **q. Water Quality**

Potential impacts related to hydrology and water quality of the Blueprint SD Initiative Distributed Growth Alternative include downstream flooding, water quality impacts, erosion, and sedimentation. Future development must comply with all NPDES permit requirements, including the development of a SWPPP if the disturbed area covers one acre or more. Future projects would also be required to follow the City's Storm Water Standards Manual for drainage design and BMPs for treatment.

Concerning water quality, new development occurring within the project areas would be required to implement LID and storm water BMPs into the design of future projects within the project areas to address the potential for transport of pollutants of concern through either retention or filtration, consistent with the requirements of the MS4 Permit for the San Diego region and the City's Storm Water Standards Manual. Implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from the project areas to receiving waters. Thus, with compliance with the existing regulatory framework addressing protection of water quality, impacts would be less than significant.

Regarding groundwater, storm water regulations that encourage infiltration of storm water runoff and protection of water quality would protect the quality of groundwater resources and support infiltration where appropriate. Impacts would be less than significant.

## **r. Wildfire**

Future development that would occur under Blueprint SD Initiative Distributed Growth Alternative would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations aimed at ensuring the protection of people or structures from potential wildland fire hazards. While adherence to this regulatory framework would reduce potential wildfire impacts, the distribution of residents into areas would result in additional residential uses/density being located within areas at risk of wildland fires that could increase the exposure of people and structures to wildfires. Similarly, the potential increase in exposure of people to pollutant concentrations from wildfire would be significant. Impacts of this alternative would be significant and slightly greater than the project due to more areas being subject to wildfire hazards.

Regarding emergency evacuation and response plans, the City and the County OES continue to coordinate to update the MJHMP as hazards, threats, population, and land use, or other factors change to ensure that impacts to emergency response plans are less than significant. Therefore, evacuation impacts under the Distributed Growth Alternative are less than significant, similar to the project.

Future utility and infrastructure improvements would be required to comply with all applicable City standards; thus, associated utility and infrastructure improvements are not likely to exacerbate fire risk. However, at this program level of review, potential temporary or ongoing impacts to the environment due to the installation or maintenance of infrastructure would be significant.

While this alternative's project areas could be subject to risks associated with downstream flooding or landslides, the existing regulatory framework related to flooding and geologic hazards would minimize potential risks. However, based on the potentially significant flooding risk identified in the hydrology analysis that also applies to this alternative, potential risks related to flooding would also be significant.

### 8.3.3 Conclusion

The Blueprint SD Initiative Distributed Growth Alternative would result in the same amount of growth potential; however, the development would be distributed throughout the City. This would result in increases in impacts related to wildfire, land use, air quality, biological resources, transportation, and energy. For the issues of land use and GHG emissions the less than significant impact of the project would be significant under this alternative as this alternative is less consistent with the CAP goals and policies. Noise impacts would remain significant but would be slightly reduced under this alternative compared to the project.

## 8.4 ~~Blueprint SD Initiative~~ Reduced Density Alternative

### 8.4.1 Description

Under this alternative, the General Plan Land Use and Community Planning Element Figure LU-1 would be amended to reduce the overall density allowances within the Climate Smart Village Areas. Density would still be focused within areas with a village propensity value of 7 and above, but maximum density ranges would be reduced. This alternative would similarly result in reduced densities within both the University CPU and Hillcrest FPA. Within the University CPU, this alternative would result in reduced non-residential and residential development capacity, due to lower density and intensity uses, including a maximum of 145 dwelling units per acre within the Urban Village designation. Within the University Towne Centre district, the project designates most of the area as Urban Employment Village High-3 (0-218 du/ac, FAR up to 7.0), while this alternative would designate the area as Urban Village High-2 (0-145 du/ac, FAR up to 5.0). Within the Nobel/Campus district, areas to the west of Interstate 5 are designated by the project as Urban Employment Village High-2 (0-145 du/ac, FAR up to 5.0) are designated as Community Village (0-109 du/ac) by this alternative, and areas east of Interstate 5 are designated by the project as Urban Village High-1 (0-109 du/ac, FAR up to 3.0) are designated as Medium-High Density Residential (30-44 du/ac) and High Density Residential (45-73 du/ac) by this alternative. Residential capacity under this alternative would allow approximately 22,000 new homes and approximately 55,000 new jobs within the University CPU area.

Within the Hillcrest FPA area, this alternative would allow for reduced residential development capacity, allowing a maximum of up to 218 dwelling units per acre within the Community Commercial designation and maximum of up to 109 dwelling units per acres within the Residential Very High designation. Residential capacity within the Hillcrest FPA area under this alternative would



allow approximately 14,106 new homes and non-residential capacity of approximately 1,037,600 square feet.

Under this alternative, future CPUs planned pursuant to the Blueprint SD Initiative would set densities in a manner generally consistent with the reduced densities outlined above for the University CPU and Hillcrest FPA. The number of homes and FAR non-residential capacity would be reduced at a level similar to the reductions in the two plans.

This alternative would implement a land use framework consistent with the SANDAG Regional Plan transportation network, but it would not achieve CAP mode share goals to the same degree, due to reduced densities that would be less supportive to expanded transit investments. This alternative would likely result in an overall lower scale of development including reduced building heights within areas with Climate Smart Village Areas, resulting in reduced impacts related to aesthetics, but still significant like the project. Overall growth projections ~~assumed~~ under this alternative would be reduced compared to the project.

The University Community Planning Group requested that the City analyze a reduced density alternative for the University CPU. This alternative includes reduced density for not only the University CPU, but also the Blueprint SD Initiative and the Hillcrest FPA. It was selected for consideration as it is feasible, has the potential to reduce significant impacts, and would achieve most of the project objectives.

## **a. Aesthetics**

The ~~Blueprint SD Initiative~~ Reduced Density Alternative would reduce proposed density within Climate Smart Village Areas (e.g., areas with a village propensity value of 7 and above) throughout the City including within the University CPU area and the Hillcrest FPA area. Within the University CPU and Hillcrest FPA area, this alternative would result in reduced non-residential and residential development capacity compared to the project. Development in other areas of the City would continue to occur consistent with the proposed Village Climate Goal Propensity map. This alternative would result in lower development intensities (e.g. height and floor area ratio) within the Climate Smart Village Areas and within the University CPU area and Hillcrest FPA area. The highest development intensities would still be focused within the Climate Smart Village areas, but the overall development intensity would be reduced, thus impacts associated with scenic vistas and viewsheds within the Climate Smart Village areas, the University CPU area and Hillcrest FPA area under this alternative would be reduced compared to the project. While compliance with the existing regulations would likely minimize impacts related to scenic vistas and public views and visual character, it cannot be ensured that future development under the Reduced Density Alternative would result in less than significant impacts. Thus, while development under the Reduced Density Alternative related to scenic vistas and views and neighborhood character would be significant, impacts would be reduced compared to development under the project.

Development under this alternative could occur in proximity to designated and eligible scenic routes and could be within the potential scenic viewshed of these scenic routes. Therefore, impacts to scenic views or vistas from a state-designated highway would remain significant, although to a lesser extent than the project.

Implementation of the policy framework within the General Plan and applicable community plans, as well as required adherence to the existing regulatory framework including, but not limited to, the ~~SDRs~~ Supplemental Development Regulations within Community Plan Implementation Overlay Zones, would ensure that the design of new development would incorporate design features that enhance neighborhood character and minimize adverse impacts associated with increased bulk, scale, and height. Building materials, style, and architectural features would be reviewed to ensure the character of development meets required development standards. Notwithstanding these requirements, at this program level of review, and without project-specific development plans, impacts associated with existing visual character and scenic quality would be significant but to a lesser extent than the proposed project. While existing protections are in place to preserve the City's canyons and steep slopes, specific development proposals and grading quantities are not known at this time, thus impacts would be significant.

Under the Reduced Density Alternative, as with the proposed project, compliance with the City's LDC would ensure impacts related to lighting and glare would be less than significant. Buildout of the Reduced Density Alternative could result in development that could create new sources of substantial shade in the project areas, although to a lesser extent than the project. Future discretionary projects will undergo a project-specific environmental review which could identify additional project features and/or mitigation measures to address potential shade impacts; however, ministerial projects may not be subject to the same level of evaluation for shade impacts. Shade impacts would remain significant, although reduced compared to the project due to lesser development intensity anticipated.

## **b. Air Quality**

Regarding existing air quality plans, the ~~Blueprint SD Initiative~~ Reduced Density Alternative would conflict with the adopted RAQS and SIP because development intensity would be greater than the projections used by SANDAG in developing the RAQS and SIP. Therefore, impacts associated with consistency with air quality plans would be significant. Impacts would remain significant, although reduced compared to the project.

Regarding operational emissions, under the ~~Blueprint SD Initiative~~ Reduced Density Alternative development would be focused in high village propensity areas but overall development intensity would be reduced compared to the project. This would result in lower operational emissions overall compared to the project due to reduced development potential within high village propensity areas. At this program level of analysis, impacts related to operational air emissions would be significant and slightly reduced compared to the project.

Construction emissions under the ~~Blueprint SD Initiative~~ Reduced Density Alternative would be significant but reduced compared to those anticipated under the project because reduced development would be allowed. Additionally, the scale of construction projects would likely be reduced due to the reduced development intensities in certain areas compared to the project.

Like the project, impacts related to odor and sensitive receptors would be significant under the ~~Blueprint SD Initiative~~ Reduced Density Alternative.

### c. Biological Resources

The ~~Blueprint SD Initiative~~ Reduced Density Alternative would result in a similar level of biological resources impacts as the project. Implementation of this alternative could result in a potentially significant impact related to sensitive species, sensitive habitats, and wetlands. Pursuant to the ESL Regulations, projects would be reviewed for the presence of ESL. If the development area is determined to support ESL, the project would be required to demonstrate compliance with ESL Regulations, the City's Biology Guidelines, and the provisions of the MSCP and VPHCP. Thus, with implementation of existing regulatory protections for biological resources, impacts to sensitive species and habitats resulting from future development within the project areas would typically be able to be reduced to less than significant. However, at a program level of review, impacts of future development are not known and it cannot be determined whether impacts could be fully mitigated. The extent of impacts to biological resources resulting from implementation of the Reduced Density Alternative would be similar to those identified for the project, as the extent and areas of disturbance by development would be generally the same and only the type and/or intensity of planned development capacity would change. Therefore, impacts to sensitive species, sensitive habitats, and wetlands under this alternative would be significant and the same as the project.

Impacts of this alternative related to wildlife corridors and nursery sites would be less than significant, the same as the project due to required compliance with MSCP and VPHCP. Similarly, through compliance with the MSCP and VPHCP, impacts related to conservation planning would be less than significant for this alternative, same as the project.

### d. Cultural Resources

The ~~Blueprint SD Initiative~~ Reduced Density Alternative would result in reduced growth potential within Climate Smart Village areas throughout the City including within the University CPU area and the Hillcrest FPA area. Within the University CPU and Hillcrest FPA area, this alternative would result in reduced non-residential and residential development capacity compared to the project. Development would remain focused in Climate Smart Village areas, the University CPU area and Hillcrest FPA area, with a value between 7 through 14 but would occur at a reduced density compared to the project. Like the project, this alternative has the potential to result in significant direct and/or indirect impacts to cultural resources. The extent of impacts to cultural resources resulting from implementation of this alternative would be similar to those identified for the project.

The extent of impacts to historical resources resulting from implementation of the Reduced Density Alternative would be similar to those identified for the project, as the extent and areas of disturbance by development would be generally the same and only the type and/or intensity of planned development capacity would change. As with the project, implementation of the Reduced Density Alternative would result in potentially significant impacts related to historical resources at the program level that would be significant.

Regarding prehistoric and archaeological resources, future development under the Reduced Density Alternative, as with the project, has the potential to result in significant direct and/or indirect impacts to prehistoric and archaeological resources. The extent of impacts to prehistoric and archaeological resources resulting from implementation of the Reduced Density Alternative would

be similar to those identified for the project, as the extent and areas of disturbance by development would be generally the same and only the type and/or intensity of allowed development would change.

The California Health and Safety Code provides a process and requirements for the identification and repatriation of collections of human remains or cultural items. With implementation of local, state, and federal regulations, impacts to human remains would be less than significant for the Reduced Density Alternative, the same as the project.

While the LDC provides for the regulation and protection of designated and potential cultural resources, at a program level of analysis it is impossible to ensure the successful preservation of these resources within the project areas. Thus, potential impacts to cultural resources ~~would be considered significant~~would be significant, the same as the project.

### **e. Energy**

As with the project, future projects under the ~~Blueprint SD Initiative~~ Reduced Density Alternative would be subject to existing building and energy code regulations in place at the time in which they are implemented. This alternative would result in a land use pattern focused in high village propensity areas, like the proposed project, but at a lower density. Areas with a village propensity value of 5 and 6 could have some land use change with higher intensity development, but less than the Climate Smart Village areas and within the University CPU area and Hillcrest FPA area – development would continue to occur at the current rate or slightly increased densities. While overall growth would be reduced in the Reduced Density Alternative, development would continue to focus within Climate Smart Village Areas and within the University CPU area and Hillcrest FPA area which are areas with the greatest potential to reduce energy expenditure related to vehicle use. Additionally, reduced development potential could result in less energy emissions compared to the project. This alternative would achieve high densities near transit stops to a lesser extent than the project. The land use pattern under this alternative would be energy efficient, like the project due to the transportation efficiency.

At this program level of analysis, it is too speculative to quantify the construction-related energy consumption of future development, either in total or by fuel type. There are no known conditions in the project area that would require nonstandard equipment or construction practices that would increase fuel-energy consumption above typical rates. Therefore, development implemented in accordance with the alternative, like the project, would not result in the use of excessive amounts of fuel or other forms of energy during the construction of future projects. Impacts would be less than significant.

The alternative would result in a less than significant impact related to conflicts with plans and policies that aim to incentivize energy efficiency and impacts would be similar to the project.

### **f. Geology and Soils**

Under the ~~Blueprint SD Initiative~~ Reduced Density Alternative all future development requiring grading within the City would be required to prepare a site-specific geotechnical investigation and

implement site-specific measures to avoid geologic hazards. These regulations and requirements would apply equally to the alternative and the project. Geologic hazards include seismic hazards, erosion or loss of topsoil, geologic instability, and expansive soils. Adherence to the SDMC grading regulations and construction requirements and implementation of the City's geotechnical study requirements would preclude significant impacts related to seismic hazards. Conformance to mandated City grading requirements would ensure that proposed grading and construction operations would avoid significant soil erosion impacts. Construction in accordance with existing regulations and implementation of recommendations in the site-specific geotechnical report would prevent impacts related to geologic instability.

With implementation of recommendations included in site-specific geotechnical investigations required under the CBC and SDMC, impacts related to geologic hazards would be less than significant under the ~~Blueprint SD Initiative~~ Reduced Density Alternative, the same as the project.

Impacts to paleontological resources under the ~~Blueprint SD Initiative~~ Reduced Density Alternative would be less than significant, the same as the proposed project. Future development projects implemented under this alternative could involve excavation of previously undisturbed areas, some of which may contain unique paleontological resources with fossil-bearing potential. Potential impacts to paleontological resources were evaluated in the General Plan PEIR and the analysis concluded that there is a potential for the cumulative loss of paleontological resources throughout the City as the City continues to develop in response to projected population growth. Likewise, development implemented in accordance with future development projects may result in the loss of unique paleontological resources or geologic formations with fossil-bearing potential. Pursuant to Section 142.0151 of the SDMC, all projects must comply with the General Grading Guidelines for Paleontological Resources included in Appendix P of the City's Land Development Manual. These guidelines also include the standard monitoring requirement, should a project meet the threshold for paleontological resource monitoring.

This regulation would apply to projects within and outside of the Climate Smart Village areas and within the University CPU area and Hillcrest FPA area and would ensure that impacts to paleontological resources under this alternative would be less than significant, the same as the project.

## **g. Greenhouse Gas Emissions**

The ~~Blueprint SD Initiative~~ Reduced Density Alternative would result in reduced growth potential compared to the project within Climate Smart Village areas and within the University CPU area and Hillcrest FPA area. Within the University CPU and Hillcrest FPA area, this alternative would result in reduced non-residential and residential development capacity compared to the project. While growth would be reduced under this alternative compared to the project, housing and goods/services would be located near employment centers with convenient transit access, to the same extent as the project. While the Reduced Density Alternative could result in reduced emissions due to less development intensity being allowed, this could result in the alternative being less VMT efficient due to reduced densities near transit. Less development in high village propensity areas compared to the project would result in less transit supportive density.

Overall, this alternative would be less consistent with CAP goals because it would not maximize housing development to the same degree as the project in areas that would support a mode shift towards alternative transportation modes. The Reduced Density Alternative would accommodate housing demands to a lesser degree than the project due to the reduced density and would therefore achieve mode share goals to a lesser degree than the proposed project. Impacts associated with GHG emissions would be less than significant under this alternative; however, slightly greater than the project. This alternative would result in less than significant impacts related to consistency with the CAP.

## **h. Hazards and Hazardous Materials**

Compliance with federal, state, regional, and local health and safety laws and regulations would address potential health and safety impacts for the ~~Blueprint SD Initiative~~ Reduced Density Alternative, the same as the proposed project. Hazardous materials and waste would be managed and used in accordance with all applicable federal, state, regional, and local laws and regulations, and the project would not create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

In accordance with City, state, and federal requirements, any new development that involves contaminated property would necessitate the clean-up and/or remediation of the property in accordance with applicable requirements and regulations. No construction would be permitted to occur at a contaminated site until a “no further action” clearance letter from the County DEH, or similar determination is issued by the SDFD, DTSC, RWQCB, or other responsible agency. Therefore, impacts related to hazardous materials sites and schools would also be less than significant.

Regarding emergency evacuation and response plans, the City and the County OES continue to coordinate to update the MJHMP as hazards, threats, population, and land use, or other factors change to ensure that impacts to emergency response plans are less than significant.

## **i. Hydrology**

Potential impacts related to hydrology under the ~~Blueprint SD Initiative~~ Reduced Density Alternative include downstream flooding, erosion, and sedimentation, mudflow, and tsunamis. Future projects under the Reduced Density Alternative would be required to comply with the City's drainage and floodplain regulations in the SDMC and would be required to adhere to the City's Drainage Design Manual, ESL Regulations protecting floodplains, FEMA standards, and the City's Stormwater Standards Manual which would ensure development is designed to avoid drainage impacts due to erosion and siltation, surface run-off, stormwater drainage systems, and flood flows; therefore, impacts would be less than significant.

Impacts related to pollutant release resulting from inundation within the Reduced Density Alternative area are anticipated to be less than significant for most areas due to required compliance with applicable SDMC and FEMA regulations that require protection from flooding. Future development would be required to conform to the City's Flood Mitigation Plan and the SDMC for Development Regulations for SFHAs (Section 143.0145 and 143.0146) which would ensure flood



hazards and the corresponding risk of release of pollutants due to inundation are minimized. Impacts related to development behind the PAL area are considered significant due to the level of uncertainty regarding this potential flooding impact. Under the Reduced Density Alternative area, impacts related to flooding and inundation would still be significant in the same areas as under the project where there is existing development in flood inundation zones.

## j. Land Use and Planning

The ~~Blueprint SD Initiative~~ Reduced Density Alternative would accommodate reduced growth compared to the project. This alternative would not implement the City of Villages strategy or the CAP to the same degree as the project since development would be reduced in high village propensity areas, e.g. areas with a village propensity value between 7 and 14. This alternative would not achieve the mode share goals of the CAP to the same degree as the project, and would result in reduced consistency with the General Plan and the CAP. This alternative would reduce densities within high village propensity areas compared to the project. Compared to the project, the Reduced Density Alternative would create reduced opportunity for housing near existing and future transit stations and stops identified in the SANDAG Regional Plan which allow residents, employees, students, and visitors to more safely, conveniently, and enjoyably travel by walking/rolling, biking, or transit in line with the CAP. Therefore, while the Reduced Density Alternative would not conflict with existing City plans or policies, it would not take the steps needed to fully achieve the goals of existing City plans or policies including the CAP to the same degree as the project.

Impacts related to noise element consistency related to land use-noise incompatibilities would be reduced compared to the project as less development would occur in noise sensitive areas subject to vehicle noise. Impacts related to conflicts with an adopted ALUCP would be less than significant, the same as the project. Impacts related to MSCP and VPHCP consistency under this alternative would be less than significant, the same as the project due to required compliance with ESL ~~Regulations~~ regulations that require that any project located adjacent to MHPA to comply with MHPA Land Use Adjacency Guidelines, which would minimize potential direct and indirect impacts to sensitive habitats and wildlife species within the MHPA. Future development under the ~~Blueprint SD Initiative~~

Reduced Density Alternative would be located within the ALUCP identified noise contours. However, during the building permit process for new development, overflight notification requirements would apply. Therefore, impacts associated with conflicts with the ALUCP under this alternative would be less than significant, the same as the project.

Development under the Reduced Density Alternative would not physically divide an established community as it would still implement the same policies as the project described in Section 4.10.4 Issue 1; therefore, impacts would be less than significant.

No deviations ~~to or~~ variances from the City's development regulations would be proposed as part of the Reduced Density Alternative. Future development consistent with the Reduced Density Alternative may propose deviations to or variances from the City's development regulations. If findings cannot be supported by the City, the potential deviation or variance would not be approved. Therefore, with application of the City's LDC, physical impacts resulting from potential deviations or

variances associated with future development anticipated by the project would be less than significant under the Reduced Density Alternative, similar to the project.

## k. Noise

Under ~~Blueprint SD Initiative~~ Reduced Density Alternative, traffic generated noise would be slightly reduced compared to the project. This alternative, like the project, could result in an increase in ambient noise levels that could exceed the City's significance thresholds. Thus, at a program level of analysis, impacts related to ambient noise and traffic-related noise would be significant. While project impacts would also be significant, impacts of this alternative would be slightly reduced compared to the project as development would be reduced in high village propensity areas compared to the project. Impacts related to rail noise and vibration would be significant, the same as the project. While it is not anticipated that stationary noise sources associated with this alternative would result in noise exceeding property line limits, at a program level of review it cannot be ensured without site-specific development details and equipment locations which are not available at this time. Thus, impacts related to stationary noise would be significant, the same as the project, but to a lesser extent compared to the project.

Future development implemented under ~~Blueprint SD Initiative~~ Reduced Density Alternative and proposed project would be required to comply with applicable City and state noise regulations including Title 24 Building Code requirements and the City's Noise Ordinance. The temporary construction noise impacts of this alternative would be similar to the proposed project, as construction activities could potentially generate short-term noise levels in excess of 75 dB(A)  $L_{eq}$  at adjacent properties. While the City regulates noise associated with construction equipment and activities through its Noise Abatement and Control Ordinance, due to the highly developed nature of the area with sensitive receivers potentially located in proximity to construction sites, there is the potential for construction to occur that would expose existing sensitive receptors to significant noise levels. Thus, impacts associated with temporary construction noise would be the same under this alternative as under the project.

Thus, both the proposed project and the ~~Blueprint SD Initiative~~ Reduced Density Alternative would result in significant impacts related to traffic noise exposure, temporary construction noise, and construction vibration impacts. While traffic related noise and ambient noise would be significant, like the project; reduced densities would incrementally reduce traffic and ambient noise levels compared to the project.

## l. Public Services

Existing infrastructure deficiencies exist in various areas throughout the City, and as development occurs, public facility improvements will likely be required to serve the City's growing population. At the time future facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new facilities. However, as the location and need for potential future facilities cannot be determined at this time, it is unknown what specific impacts may occur. Thus, as it cannot be ensured that all impacts associated with the construction

and operation of potential public services and recreational facilities would be mitigated to a less than significant level, impacts would be significant, the same as the project.

## m. Recreation

Existing infrastructure deficiencies exist in various areas throughout the City, and as development occurs, public facility improvements will likely be required to serve the City's growing population. At the time future facilities are proposed, they would require a separate environmental review and compliance with regulations in existence at that time would address potential environmental impacts related to the construction and operation of new facilities. However, as the location and need for potential future facilities cannot be determined at this time, it is unknown what specific impacts may occur. Thus, as it cannot be ensured that all impacts associated with the construction and operation of potential public services and recreational facilities would be mitigated to a less than significant level, impacts would be significant, the same as the project.

## n. Transportation

Potential impacts related to transportation and circulation under ~~Blueprint SD Initiative-Reduced Density~~ Alternative relate to consistency with City policies, VMT, emergency access, and design features. From a policy perspective, this alternative would not facilitate the development of homes and jobs in areas with a higher village propensity value to the same extent as the project. Providing reduced density in Climate Smart Village Areas and within the University CPU area and Hillcrest FPA area compared to the project would potentially result in less reductions in citywide per capita and per employee VMT when compared to the project, assuming the same amount of growth needs to be accommodated in the City. While impacts of the ~~Blueprint SD Initiative-Reduced Density~~ Alternative related to transportation policy consistency would be less than significant, this alternative would not implement the City's transportation policies to the same degree as the project.

This alternative would result in reduced housing in Climate Smart Village Areas and within the University CPU area and Hillcrest FPA area compared to the project which would reduce the overall capacity for growth within areas most conducive to achieving citywide VMT per capita reductions. could allow for more housing to occur in less VMT efficient areas (>85 percent region average) compared to the project. Like the project, VMT impacts would be significant, and incrementally increased compared to the project due to reduced potential for growth in areas supportive of citywide VMT per capita reductions.

Concerning design features, under this alternative, proposed improvements to roadways or amenities such as bicycle facilities would undergo review and approval by the City Engineer. Adherence to City standards, including the City's Street Design Manual, would ensure that a substantial increase in hazards or incompatible uses would not occur as a result of this alternative. The alternative does not include any requirements that would result in a substantial increase in hazards due to design features or incompatible uses. Impacts concerning design features would be less than significant, similar to the project.

Concerning emergency access, future development allowed under this alternative would be required to comply with all applicable City codes and policies related to emergency access and

would be reviewed by the City Fire Marshal to ensure adequate emergency access. Therefore, impacts related to emergency access would be less than significant, like the project.

## **o. Tribal Cultural Resources**

The ~~Blueprint SD Initiative~~ Reduced Density Alternative would result in reduced development intensities within Climate Smart Village Areas and within the University CPU area and Hillcrest FPA area, but the ultimate footprint of development would not change. While the LDC provides for the regulation and protection of designated and potential Tribal Cultural Resources, at a program level of analysis it is impossible to ensure the successful preservation of these resources within the project areas. This alternative has the potential to result in the same level of significant direct and/or indirect impacts to Tribal Cultural Resources as the project.

## **p. Utilities and Service Systems**

Potential impacts to public utilities under ~~Blueprint SD Initiative~~ Reduced Density Alternative relate to water supply, utilities, and solid waste and recycling. From a policy perspective, water supply impacts under this alternative would be reduced as there would be less growth in Climate Smart Village areas and within the University CPU area and Hillcrest FPA area when compared to the project. Anticipated densities under this alternative would be less than what was evaluated in the Water Supply Assessments for the University CPU and Hillcrest FPA, which could in turn result in reduced water demand. For Climate Smart Village areas, growth would similarly be reduced; however, like the project, at the time future Community Plan Updates are proposed to implement the Village Climate Goal Propensity maps, WSAs would be prepared to evaluate and document the availability of water supplies over the planning horizon. ~~in excess of what would have been considered in the latest water supply planning document. However, like the project, water supplies are available to support substantial growth in the City considering the low residential unit production that has occurred in the City in comparison to the high densities that have been authorized in recent CPUs and accounted for in water supply projections.~~ Similar to the project, under the Reduced Density Alternative water is anticipated to be available to serve the project and impacts would be less than significant.

As site-specific information regarding future demand and available wastewater capacity to serve development anticipated under the Reduced Density Alternative is not known at a program level of review, impacts are considered significant.

Mandatory compliance with the SDMC regulations, the City's Sewer Design Guidelines, and Public Utilities Department's Capital Improvement Program Guidelines and Standards would ensure future development under the Reduced Density Alternative is required to demonstrate adequate wastewater facilities and capacity is available to serve the project, or that appropriate infrastructure improvements are constructed concurrent with development to ensure adequate capacity. However, at this program level of review and without project-specific development plans, impacts associated with the construction of utility infrastructure would be significant for future development under both the ~~Blueprint SD Initiative~~ Reduced Density Alternative and the project.

Concerning solid waste and recycling, future development under the ~~Blueprint SD Initiative~~

Reduced Density Alternative would generate solid waste through demolition/construction and ongoing operations, which would increase the amount of solid waste generated within the region, the same as the proposed project. Future projects would be required to comply with City regulations regarding solid waste, which would help divert solid waste from the Miramar Landfill to preserve capacity. Therefore, impacts associated with solid waste would be less than significant similar to the project.

## q. Water Quality

Potential impacts related to water quality under the ~~Blueprint SD Initiative~~ Reduced Density Alternative could occur due to pollutants associated with construction and operation of future land uses. Future development must comply with all NPDES permit requirements, including the development of a SWPPP if the disturbed area covers one acre or more. Future projects would also be required to follow the City's Storm Water Standards Manual for drainage design and BMPs for treatment. New development occurring within the project areas would be required to implement LID and storm water BMPs into the design of future projects within the project areas to address the potential for transport of pollutants of concern through either retention or filtration, consistent with the requirements of the MS4 Permit for the San Diego region and the City's Storm Water Standards Manual. Implementation of LID design and storm water BMPs would reduce the amount of pollutants transported from the project areas to receiving waters. Thus, with compliance with the existing regulatory framework addressing protection of water quality, impacts would be less than significant.

Regarding groundwater, storm water regulations that encourage infiltration of storm water runoff and protection of water quality would protect the quality of groundwater resources and support infiltration where appropriate. Impacts would be less than significant.

## r. Wildfire

Future development that would occur under ~~Blueprint SD Initiative~~ Reduced Density Alternative would be required to comply with the City's Fire Code, Building Regulations, and Brush Management Regulations aimed at ensuring the protection of people or structures from potential wildland fire hazards. Adherence to this regulatory framework would reduce potential wildfire impacts by concentrating development primarily within Climate Smart Village Areas and within the University CPU area and Hillcrest FPA area, although at less density than the project. Impacts would be significant but to a lesser extent than the project. The likelihood of exposure of people to pollutant concentrations from wildfire would be slightly reduced compared to the proposed project but still significant.

Regarding emergency evacuation and response plans, the City and the County OES continue to coordinate to update the MJHMP as hazards, threats, population, and land use, or other factors change to ensure that impacts to emergency response plans are less than significant. Therefore, evacuation impacts under the Reduced Density Alternative are less than significant, similar to the project.

Future utility and infrastructure improvements would be required to comply with all applicable City standards; thus, associated utility and infrastructure improvements are not likely to exacerbate fire risk. However, at this program level of review, potential temporary or ongoing impacts to the environment due to the installation or maintenance of infrastructure would be significant.

While this alternative's project areas could be subject to risks associated with downstream flooding or landslides, the existing regulatory framework related to flooding and geologic hazards would minimize potential risks. However, based on the potentially significant flooding risk identified in the hydrology analysis that also applies to this alternative, potential risks related to flooding would also be significant although to a lesser extent than the project.

## 8.4.2 Conclusion

The ~~Blueprint SD Initiative~~ Reduced Density Alternative would result in overall reductions in potential growth within Climate Smart Village areas, including within the University CPU area and Hillcrest FPA area. Impacts would be reduced compared to the project for the issues of aesthetics, air quality, and noise, although these issues would be significant for both the project and this alternative. This alternative would not meet the mode share goals to the same degree as the project due to reductions in density in areas with the highest village climate goal propensity values. This alternative would result in incrementally increased impacts related to GHG and transportation (VMT per capita) compared to the project.

## 8.5 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR. The guidelines also require that if the No Project Alternative is identified as the environmentally superior alternative, then another environmentally superior alternative must be identified. The Blueprint SD Initiative Distributed Growth Alternative was not selected as the environmentally superior alternative because it would increase impacts related to GHG emissions compared to the project. Both the High Density Alternative and the Reduced Density Alternative would result in the same significance conclusions as the project; however, for some issues, impacts would be incrementally increased or incrementally reduced. The University CPU and Hillcrest FPA-High Density Alternative and Reduced Density Alternative ~~are~~ considered to be the environmentally superior alternatives, based on a comparison of the alternatives' overall environmental impacts ~~and their compatibility with the project goals and objectives~~. While the University CPU and Hillcrest FPA-High Density Alternative and Reduced Density Alternative would not eliminate any significant impacts of the project, ~~they~~ it would reduce the significance of impacts in comparison to the project. For the Higher Density Alternative the significance of impacts would be reduced for the issues of energy, GHG emissions, and transportation. For the Reduced Density Alternative, the significance of impacts would be reduced for the issues of aesthetics, air quality, and noise.



## Chapter 9.0

# Mitigation Monitoring and Reporting Program

California Environmental Quality Act (CEQA) Section 21081.6 requires that a mitigation monitoring and reporting program (MMRP) be adopted upon certification of an Environmental Impact Report (EIR) to ensure that the mitigation measures to mitigate or avoid significant effects on the environment are implemented. The MMRP specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The EIR prepared for the for the Blueprint San Diego Initiative (Blueprint SD Initiative), Hillcrest Focused Plan Amendment (Hillcrest FPA) and University Community Plan Update (CPU) and Local Coastal Plan Update (hereinafter referred to as the “University CPU”), collectively referred to as the “project” (project), incorporated herein as referenced, focuses on environmental impacts issues determined to be potentially significant by the City of San Diego (City). The project impact issues addressed in the PEIR include aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology, land use, noise, public services, recreation, transportation, tribal cultural resources, utilities and service systems, water quality, and wildfire.

Public Resources Code Section 21081.6 requires monitoring of only those impacts identified as significant or potentially significant. After analysis, the following potentially significant impacts were identified:

- Aesthetics:
- Air Quality
- Biological Resources
- Cultural Resources
- Hydrology
- Noise
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

The environmental analysis identified mitigation measures where it was determined to be feasible for the following issues: Air Quality, Biological Resources, Cultural Resources, Noise, Transportation, Tribal Cultural Resources, and Wildfire; however, impacts would not be fully reduced concluded that the potentially significant impacts associated with the resource areas identified above would be reduced through mitigation, where applicable, to the extent feasible; however, at a program level of review, all significant impacts identified were determined to remain significant. Mitigation was determined to be infeasible for the following issues: Aesthetics, Hydrology, Public Services, and Utilities and Services Systems.

**Table 9-1  
Mitigation Monitoring and Reporting Program**

Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Air Quality - Air Quality Standards	<p><b>MM-AQ-1 Air Emissions</b></p> <p>Future <u>ministerial and discretionary</u> projects shall comply with all applicable regulations pertaining to air quality including but not limited to SDAPCD Rule 20 through 20.8, Rule 50, Rule 51, Rule 52, Rule 55, and Rule 67.1. Construction and operation of individual <u>discretionary</u> development projects shall not exceed criteria pollutant significance thresholds detailed in the latest City's CEQA Significance Thresholds.</p> <p>If an individual project is found to have the potential to exceed emission thresholds due to operational emissions, the following are example measures that could be implemented to reduce emissions to below a level of significance:</p> <ul style="list-style-type: none"> <li>• <del>demonstrate net zero energy expenditure,</del></li> <li>• <del>Implementation of transportation demand management measures.</del></li> <li>• <del>Prohibit the installation of woodstoves, hearths, and fireplaces in new construction facilitated by the proposed project.</del></li> <li>• <del>Expand and facilitate completion of planned networks of active transportation infrastructure.</del></li> <li>• <del>Implement electric vehicle charging infrastructure beyond requirements set forth in the 2022 CalGreen mandatory measures, such as Tier 2 voluntary measures set forth in the 2022 CalGreen (or future more stringent) standards.</del></li> <li>• <del>Implement traffic demand measures, such as unbundling parking fees from rent/lease options, encouraging/developing a ride-share program for the community, and provide car/bike sharing services, that will reduce daily individual car usage and reduce project VMT</del></li> </ul> <p>If an individual project is found to have the potential to exceed emission thresholds due to construction emissions, the following are example measures that could be implemented during construction to reduce emissions to below a level of significance:</p> <ul style="list-style-type: none"> <li>• <del>Equipment meeting USEPA Tier IV emission standards and/or alternative fueled construction equipment, as feasibly available.</del></li> <li>• <del>Use architectural coating materials, as defined in SDAPCD Rule 67.0.1, that are zero-emission or have a low-VOC content (below 10 grams per liter). Where such VOC coatings are not available or feasible, the coating with the lowest VOC rating available shall be used.</del></li> <li>• <del>Additional dust control measures for construction sites to minimize fugitive dust including:</del> <ul style="list-style-type: none"> <li>○ <del>Contractor(s) shall implement paving, chip sealing, or chemical stabilization of internal roadways after completion of grading;</del></li> <li>○ <del>Dirt storage piles shall be stabilized by chemical binders, tarps, fencing, or other erosion control;</del></li> <li>○ <del>Enforce a 15 mph speed limit on unpaved surfaces;</del></li> <li>○ <del>Dirt and debris spilled onto paved surfaces shall be swept up immediately to reduce resuspension of particulate matter caused by vehicle movement. Approach routes to construction sites shall be cleaned daily of construction-related dirt in dry weather;</del></li> <li>○ <del>Haul trucks hauling dirt, sand, soil, or other loose materials shall be covered or 2 feet of freeboard shall be maintained;</del></li> <li>○ <del>Grading shall be terminated if winds exceed 25 mph;</del></li> <li>○ <del>Any blasting areas shall be wetted down prior to initiating the blast.</del></li> </ul> </li> </ul>	Prior to the issuance of any land development permits or development activities.	City of San Diego

**Table 9-1  
Mitigation Monitoring and Reporting Program**

Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Air Quality - Sensitive Receptors	<p><b>MM-AQ-2 Sensitive Receptors</b></p> <p>Future projects consistent with the project that would involve stationary source emissions subject to APCD permitting shall be required to obtain applicable APCD permits and demonstrate consistency with all permit conditions and APCD rules <u>consistent with SDAPCD's Title V Operating Permit Program which implements Title V of the Federal Clean Air Act.</u></p> <p>Future <u>discretionary development</u> projects that involve heavy industrial land uses such as warehousing and distribution or other land uses that would involve substantial sources of mobile source diesel emissions shall be required to prepare a health risk assessment (HRA) in accordance with <u>SDAPCD HRA Guidelines (2006)</u> and the Office of Environmental Health Hazard Assessment (OEHHA) Air Toxics "Hot Spots" Program Risk Assessment Guidelines (<u>OEHHA 2015</u><del>2022</del>). The HRA shall include calculation of the excess cancer risk and the non-cancer chronic and acute health hazard index (HHI) for the maximally exposed individual resident (MEIR), and the maximally exposed individual worker (MEIW). The HRA shall identify best available control technology (BACT) required to reduce risk to less than 10 in 1,000,000.</p>	Prior to the issuance of any land development permits or development activities.	City of San Diego
Air Quality - Odors	<p><b>MM-AQ-3 Odors</b></p> <p>Any <u>discretionary</u> project with the potential to result in objectionable odors shall be required to demonstrate compliance with SDAPCD Rule 51 (Public Nuisance), which prohibits the discharge of air contaminants or other materials that would be a nuisance or annoyance to the public. <u>Additionally, application of SDMC Section 142.0710 prohibits odors to emanate beyond the boundaries of the premises upon which the use emitting the contaminants is located, where it endangers human health, causes damage to vegetation or property, or causes soiling.</u></p>	Prior to the issuance of any land development permits or development activities.	City of San Diego
Biological Resources – Sensitive Species, Sensitive Habitats, Wetlands, Cumulative Impacts	<p><b>MM-BIO-1 – Impacts to Sensitive Biological Resources</b></p> <p>Future projects that could directly and/or indirectly impact sensitive species, sensitive habitats and/or wetlands shall comply with the City's Environmentally Sensitive Lands (ESL) Regulations, Biology Guidelines, and applicable federal, state, and local Habitat Conservation Plans including, but not limited to, the City's Multiple Species Conservation Program (MSCP) Subarea Plan and Vernal Pool Habitat Conservation Plan (VPHCP) and shall implement avoidance, minimization, and mitigation measures in accordance with the City's ESL Regulations, Biology Guidelines, and MSCP <del>Subarea Plan</del> <u>SAP</u>, and VPHCP.</p>	Prior to the issuance of any land development permits or development activities.	City of San Diego
Cultural Resources - Historic Resources	<p><b>MM-HIST-1 Historic Resources</b></p> <p>Future development that could directly and/or indirectly affect a historical building, structure, or object as defined in the City's Historical Resources Regulations and Historical Resources Guidelines shall comply with the City's Historical Resources Guidelines and Historical Resources Regulations (SDMC sections 143.0201–143.0280) and shall be required to implement avoidance, minimization, and mitigation measures in accordance with the City's Historical Resources Regulations and Historical Resources Guidelines.</p>	Prior to the issuance of any land development permits or development activities.	City of San Diego

**Table 9-1  
Mitigation Monitoring and Reporting Program**

Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Cultural Resources - Archaeological Resources	<p><b>MM-HIST-2 Archaeological and Tribal Cultural Resources</b></p> <p>Prior to the issuance of any discretionary permit for a future development project that could directly and/or indirectly affect a cultural resource (i.e. archaeological and Tribal Cultural Resources), the City shall require the following steps be taken to determine (1) the potential presence and/or absence of cultural resources, and (2) the appropriate mitigation for any significant resources that may be impacted. For the purposes of CEQA review, a cultural resource is defined in CEQA Guidelines Section 15064.5. Tribal cultural resources are defined in PRC Section 21074.</p> <p><b>Initial Determination</b></p> <p>The City's Environmental Designee shall determine the potential presence and/or absence of cultural resources at the project site by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, the California Historical Resources Inventory System, and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit. A review of the cultural resources sensitivity map (see Figure 4.4-1a through 4.4-1e) shall be done at the initial planning stage of a project to ensure that cultural resources are avoided and/or impacts are minimized to the extent feasible in accordance with the City's Historical Resources Guidelines. The sensitivity levels described below shall guide the appropriate steps necessary to address the potential resources. Sensitivity ratings may be adjusted based on the amount of disturbance that has occurred, which may have previously impacted cultural resources, as well as new data available to the City.</p> <p><b>High Sensitivity:</b> Indicates locations where significant cultural resources have been documented or would have the potential to be identified. High sensitivity resources include village and habitation sites and areas near fresh water sources. These resources may range from moderately complex to highly complex, with more defined living areas or specialized work space areas, and a large breadth of features and artifact assemblages. The potential for identification of additional resources in such areas would be high.</p> <p><b>Moderate Sensitivity:</b> Indicates that some cultural resources have been recorded within the area or the area was developed before 1984 when CEQA review may not have been applied. Moderate sensitivity resources consist of diversity or density of feature and artifact types (e.g., a moderately dense lithic scatter).</p> <p><b>Low Sensitivity:</b> Indicates areas where there is a high level of disturbance or development, and few or no previously recorded cultural resources are present based on records search results and due to the timing of development of the project site occurring after 1984 when CEQA would have been applied. Within these areas, the potential for additional resources to be identified would be low.</p> <p><b>Phase I</b></p> <p>Based on the results of the initial determination, if there is any evidence that the project area contains archaeological and/or Tribal Cultural Resources, a site-specific records search and/or survey may be required and shall be determined on a case-by-case basis by the City's Environmental Designee. If a cultural resources study is required, it shall be prepared consistent with the City's Historical Resources Guidelines. All individuals conducting any phase of the cultural resources program shall meet the professional qualifications in accordance with the City's Historical Resources Guidelines. The cultural resources study shall include the background research conducted as part of the initial determination. This includes a record search at the SCIC at San Diego State University. A review of the Sacred Lands File maintained by the</p>	Prior to the issuance of any land development permits or development activities.	City of San Diego

**Table 9-1  
Mitigation Monitoring and Reporting Program**

Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p>NAHC shall also be conducted at this time. The cultural resources study shall include a field survey and/or an evaluation of significance, as applicable if cultural resources are identified, based on the City's Historical Resources Guidelines. Native American participation shall be required for all field work.</p> <p><b>Phase II</b></p> <p>Once a cultural resource (as defined in the PRC) has been identified, a significance determination shall be made. If a project were to impact areas identified as low sensitivity, it is assumed that any significant cultural resources no longer hold integrity or are not present. If a project impacts these areas, no additional mitigation measures shall be required.</p> <p>If a project were to impact areas identified as moderate sensitivity, a site-specific records search and/or survey may be required on a case-by-case basis. If cultural resources are identified in the records search and/or survey, a significance evaluation for the identified cultural resources shall be required. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action shall be required. Resources found to be non-significant as a result of a survey and/or assessment shall require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation site forms and inclusion of the results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation indicate there is still a potential for resources to be present in portions of the property, then mitigation monitoring shall be required. If the resource has not been evaluated for significance, a testing plan shall be required. If the resource is determined to be significant, a testing plan, data recovery plan, and mitigation monitoring shall be required.</p> <p>If a project were to impact areas identified as high sensitivity, a survey and testing program may be required by the qualified archaeologist to further define resource boundaries subsurface presence or absence and determine the level of significance. A thorough discussion of testing methodologies including surface and subsurface investigations can be found in the City's Historical Resources Guidelines. The results from the testing program shall be evaluated against the Significance Thresholds found in the City's Historical Resources Guidelines. If significant cultural resources are identified within the area of potential effects, the site may be eligible for local designation.</p> <p>Preferred mitigation for direct and/or indirect impacts to cultural resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. Mitigation measures such as, but not limited to, a Research Design and Archaeological Data Recovery Program (ADRP), construction monitoring, site designation, capping, granting of deeds, designation of open space, and avoidance and/or preservation shall be required and shall be determined by the City's Environmental Designee on a case-by-case basis.</p> <p><b>Phase III</b></p> <p><i>Archaeological Data Recovery Program</i></p> <p>If a cultural resource is found to be significant and preservation is not an option, a Research Design and ARDP shall be required, which includes a Collections Management Plan for review and approval by the City's Environmental Designee. The ADRP shall be based on a written research design and is subject to the provisions as outlined in PRC Section 21083.2. The ADRP shall be reviewed and approved by the City's Environmental Designee prior to distribution of a draft CEQA document.</p>		

**Table 9-1  
Mitigation Monitoring and Reporting Program**

Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
	<p><i>Local Designation of Resources</i></p> <p>The final cultural resource evaluation report shall be submitted to Historical Resources Board (HRB) staff for designation. The final cultural resource evaluation report and supporting documentation will be used by HRB staff in consultation with qualified City staff to ensure that adequate information is available to demonstrate eligibility for designation under the applicable criteria.</p> <p><i>Monitoring and Archaeological Resource Reports</i></p> <p>Archaeological monitoring may be required during building demolition and/or construction grading when significant cultural resources are known or suspected to be present on a site but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development, dense vegetation, or if a data recovery did not reduce the impact to the resource. Monitoring shall be documented in a consultant site visit record.</p> <p>Native American participation shall be required for all subsurface investigations, including geotechnical testing and other ground disturbing activities whenever a tribal cultural resource or any archaeological site. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of PRC Section 5097 shall be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the PRC (Section 5097.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions shall be outlined in the Mitigation Monitoring and Reporting Program included in a subsequent project-specific environmental document. The Most Likely Descendent shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources.</p> <p>Archaeological Resource Reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the City's Historical Resources Guidelines. In the event that a cultural resource deposit is encountered during construction monitoring, a Collections Management Plan shall be required in accordance with the project's Mitigation Monitoring and Reporting Program. The disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by State (i.e., AB 2641 [Coto] and California Native American Graves and Repatriation Act [NAGPRA] of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., federal NAGPRA United States Code 3001-3013)) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation, as identified by the Native American Heritage Commission.</p> <p>Arrangements for long-term curation must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance, and must be included in the archaeological survey, testing and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collection (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations Part. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.</p>		



**Table 9-1  
Mitigation Monitoring and Reporting Program**

Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Noise – Ambient Noise Levels (Construction Noise and Non-Transportation Noise Increases)	<p><b>MM-NOI-1 Noise Abatement and Control Ordinance</b></p> <p>Future projects shall be required to comply with the construction noise levels limits defined by San Diego Municipal Code Section 59.5.0404. If construction noise would exceed the construction noise limits, a permit <del>would be required from and would be granted by</del> the Noise Abatement and Control Administrator <u>in accordance with SDMC Section 59.5.0404, which may include the incorporation of</u>. <del>If necessary to comply with San Diego Municipal Code Section 59.5.0404, site specific noise reduction measures may be incorporated</del> to meet property line limitations.</p> <p>Future development with stationary sources of noise shall comply with Section 59.5.0401 et seq. of the SDMC, which specifies the maximum one-hour average sound level limits allowed at the boundary of a property.</p>	Prior to the issuance of any land development permits or development activities.	City of San Diego
Noise – Groundborne Vibration	<p><b>MM-NOI-2 Vibration – Construction Activities</b></p> <p>Future projects that include pile driving and would result in vibration levels exceeding the peak particle velocity (PPV) and screening distances detailed in Table 4.11-2 shall implement vibration reduction measures to minimize construction-related vibration impacts. Measures shall be based on the results of site-specific recommendations from an acoustical analysis. Measures may include, but are not limited to, limiting the use of vibration-intensive equipment in proximity to sensitive receptors, installing low soil displacement piles (e.g., H-piles) instead of high soil displacement piles (e.g., concrete piles) for pile-driving, and pre-drilling for pile-driving. Other measures may include pre- and post-construction inspections to document any damage and provide repairs in the event damage occurs.</p>	Prior to the issuance of any land development permits or development activities.	City of San Diego
Transportation	<p><b>MM-TRANS-1 Achieve VMT Reductions</b></p> <p>Future development shall be required to demonstrate compliance with the City’s Mobility Choices Ordinance (SDMC Section 143.1103 et seq.) and the City’s TSM, including preparation of a VMT analysis <u>and Local Mobility Analysis</u>, where applicable.</p> <p><b>MM-TRANS-2 – Community Plan Updates</b></p> <p><u>Future community plan updates shall demonstrate that future residential and nonresidential VMT levels are below the City’s CEQA Significance Determination Thresholds on a citywide basis, with the implementation of the SANDAG Regional Plan.</u></p>	Prior to the issuance of any land development permits or development activities.	City of San Diego
Tribal Cultural Resources	Refer to <b>MM-HIST-2</b>	Prior to the issuance of any land development permits or development activities.	City of San Diego

**Table 9-1  
Mitigation Monitoring and Reporting Program**

Potentially Significant Impact	Mitigation Measure	Timeframe of Mitigation	Monitoring, Enforcement, and Reporting Responsibility
Wildfire - Wildfire Hazards, Pollutants from Wildfire, Infrastructure, Flooding or Landslides, Cumulative Impacts	<p><b>MM-FIRE-1 Wildfire Policy Compliance for Plan Amendments</b></p> <p>As future Community Plan Updates or other plan amendments are proposed consistent with the Blueprint SD Initiative and the Village Climate Goal Propensity Map, the City shall evaluate the adequacy of evacuation routes, emergency access and fire safety in light of the proposed land use and mobility network. The City plan amendment process shall include a review of consistency with Policy LU-C.2.A.5, Policy UD-A.3.h, Policy UD-A.3.p, Policy PF-D.12, Policy PF-D.13, Policy PF-D.14, Policy PF-D.15, and Policy PF-D.16.</p>	Prior to adoption of Community Plan or other plan amendments.	City of San Diego
Wildfire - Wildfire Hazards, Pollutants from Wildfire, Infrastructure, Flooding or Landslides, Cumulative Impacts	<p><b>MM-FIRE-2 Wildfire Safety Policies and Regulation Compliance</b></p> <p>Future projects shall be required to demonstrate consistency with the City's applicable regulatory and policy framework including:</p> <ul style="list-style-type: none"> <li>• The latest update to the Fire Code (SDMC Sections 55.0101 through 55.9401), including requirements for adequate fire access and specifications for when two separate fire apparatus access roads are required.</li> <li>• The latest update to the City's building regulations (SDMC Chapter 14, Article 5) including acceptable construction materials for development near open space (SDMC Chapter 14, Article 5, Division 7).</li> <li>• The City's Brush Management Regulations (SDMC Section 142.0412) and Landscape Standards, adopted as part of the Land Development Manual.</li> </ul> <p>For <u>discretionary</u> projects with a higher level of wildfire or evacuation risk, as determined by the City, additional analysis demonstrating consistency with the California Office of the Attorney General issued guidance outlining best practices for analyzing and mitigating wildfire impacts of development projects under CEQA may be required.</p>	Prior to the issuance of any land development permits or development activities.	City of San Diego

## Chapter 10.0

# Certification

This Program Environmental Impact Report has been completed by the City of San Diego's (City's) City Planning Department and is based on independent analysis and determinations made pursuant to the San Diego Municipal Code Section 128.0103. The following individuals contributed to the preparation of this report.

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# Chapter 11.0

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