

RAHDGROUP

September 19, 2024

Christopher Smith
c/o Clairemont Village Quad, LLC
12625 High Bluff Drive, Suite 310
San Diego, AC 92130

Re: Letter of Support for the proposed Apartments on the back 2.5 acres of Clairemont Village Shopping Center

Dear Chris:

On behalf of our ownership of the Sorrento Towers, I wanted to send you a letter of support to the Clairemont Village Quad, LC ownership for your redevelopment project where you are bringing in a mixed use component with approximately 224 units of multifamily residential in the back parking lot on Cowley Way adjacent to our Sorrento Towers senior Residential Development.

We thank you for being a good neighbor and allowing us to have temporary parking in the back part of your lot that is allowing us to redevelop our project and refreshing all of the tenant units and also our entire parking lot. Your project is a nice amenity to the area which allows our seniors to make a short walk and avail themselves to a supermarket, drug store, restaurants and many more shops without needing any type of transportation. We look forward to a continued, mutually beneficial relationship for years to come.

Sincerely,



Colin Rice
Sorrento Housing Partners, LP

Community Investment and Partnerships

As an anchor institution, the University of San Diego recognizes our responsibility to extend our resources and expertise beyond campus borders, particularly to uplift our neighboring communities. For over 35 years USD has made concerted human and financial capital investments in Linda Vista to strengthen ties between campus and community. Partnerships and initiatives over the years include organized cleanups, providing technical support for grant applications aimed at economic development, and student mentorship programs. Our commitment extends to nurturing future leaders through our work in local schools, embodying our dedication to fostering a sustainable, inclusive, and thriving environment for all. This included a co-located space in Linda Vista over 20 years ago that provided landlord tenant mediation, community health clinic, early childhood education, and small business development. This connects to USD's mission as an institution committed to advancing academic excellence, expanding liberal and professional knowledge, creating a diverse and inclusive community, and preparing leaders dedicated to ethical conduct and compassionate service.

Schools and Youth Programs



USD's Youth Engagement Initiative (YEI) has over 50 Federal Work-Study students, coordinating educational programming for 1,200 USD undergraduates and graduates to provide tutoring, mentoring, and peer-advised counseling. Annually, about 6-7% of all of USD's work study students work to support USD's regional and bi-national partners.

- Carson Elementary School
- Montgomery Middle School
- Chesterton Elementary School
- Linda Vista Elementary
- Kearny High School
- High Tech Mesa
- San Diego Cooperative Charter School
- Linda Vista Library
- Bayside Community Center Youth Program
- Linda Vista Recreation Center
- Mark Twain High School

USD is also part of Governor Newsom's College Corp Program that provides over 130 USD students that each provide 450 hours of public service hours to Linda Vista community partners.

Economic Development and Community Empowerment

- Provided technical assistance for Linda Vista Partners to secure a LISC San Diego and US Bank grant to support 25 local BIPOC businesses in the Linda Vista Community (\$300,000 grant for local businesses)

- Provided technical assistance and funding for Linda Vista Farmers Market to address food insecurity.
The San Diego Foundation's Community Food Justice Program
- Supported and assisted in the Creation of Love Linda Vista, Inc.
- Work with Access Community Center-MBA students and business faculty provide business development consulting services.

Health and Wellness

- Bayside Community Center – community health clinical support focused on youth and seniors from School of Nursing

Neighborhood Beautification Volunteer Programs

- Clean ups and recycling events
- Graffiti abatement
- Bayside Community Center landscaping and maintenance
- Upkeep of Linda Vista community monument signs
- Tree trimming



Attendance at Events and Activities



- Title Sponsor Linda Vista Multi Cultural Fair and Parade past two years (\$20,000)
- Linda Vista Farmers Market (\$10,000)
- Linda Vista Town Council
- Carson Elementary STEAM Family nights

Linda Vista Community Partnerships



THE PHAIR COMPANY
Real Estate Investments & Development
945 East J Street
Chula Vista, California 91910
Phone (619) 426-0441
jeff@thephaircompany.com

September 12, 2024

Tait Galloway

Renee Mezo

Martin Mendez

CITY OF SAN DIEGO PLANNING DEPT

RE: Bella Mar Apartments Project in Nestor

Our Bella Mar team is nearing the end of a long, 7-year planning journey. Thank you for your contributions to that effort.

Our planning team included the community. I had half a dozen meetings with the Otay Nestor Community Planning Group. They voted unanimously twice (24-0) to support Bella Mar. I hosted many focus groups with community residents and business owners, to solicit their input. Two-hundred fifty-seven (257) people sent Letters of Support for Bella Mar to the City. Bella Mar truly reflects my commitment to "community-based planning" (see the attached article, "*Not All Developers Wear Black Hats*").

There have been eight public hearings at different forums (California Coastal Commission, Planning Commission, Community Planning Group). Not a single person has spoken in opposition to Bella Mar. To my knowledge, over the past seven years, there have been zero letters of opposition to Bella Mar sent to the City.

My experience has been that the end of 4th quarter of the year dockets are always very full. Items scheduled for hearings often get bumped off the docket. I would greatly appreciate your assistance in making sure that my Bella Mar project does not get bumped from the Planning Commission agenda on September 26th and the City Council agenda on October 28th.

My Bella Mar apartments project has been planned based upon input from the community. There has been no opposition. In light of these facts, I am requesting that you recommend that the Planning Commission and City Council agenda items be placed on their consent calendars.

Your assistance in this regard will be greatly appreciated.

Best regards,



Jeff Phair



NOT ALL DEVELOPERS WEAR BLACK HATS "DOING IT RIGHT"

Many people react negatively when they hear the word "developer." But because we know that development can be done well, Crossroads II supports appropriate development that takes the wishes of the community into account.

We heard about a project on Brandywine St. in southwest Chula Vista that seemed to be a model of how to do a project right. We contacted the developer, The Phair Company, and asked them to write something about their project and the community outreach process they followed.

The following guest article tells the story.

"Community Based Planning Benefits Everyone"

Jeffrey D. Phair

President, The Phair Company

The challenge for city planners, communities and real estate developers, is how to plan to accommodate growth without sacrificing our community's quality of life. At The Phair Company we believe this goal of quality in planning is best accomplished by "cooperative community based planning". We go out into the community and meet the neighbors who live near our proposed projects.

A good example is The Phair Company's 104-unit El Dorado Ridge townhome project in southwest Chula Vista. The vacant 14-acre parcel was an in-fill property surrounded by residential and commercial uses.

Many real estate developers meet with elected officials first and try to line up their votes for a project. At The Phair Company we meet first with the neighbors of our proposed project. We try to determine what type of development the community needs and wants. We incorporate the neighbors' input into our design/development planning before we go to the City staff or elected officials.

This "cooperative community based planning" takes longer, but the result is a project that the community played an important role in designing.

At our El Dorado Ridge project we rented the local elementary school cafeteria that was closest to the vacant parcel. We sent out personal invitations to 500 neighbors who lived within a half-mile radius. We asked the neighbors what type of development their community needed. The answers were quite diverse.

We held several of these community-planning meetings where we explored different options for developing the property. Eventually the consensus of opinion of the neighbors was that residential development would create the fewest impacts on their community.

We then designed our El Dorado Ridge townhome project with input from the neighbors on the color scheme, build-

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COMMUNITY
NEEDED."

ing heights and even landscaping and signage. At the public hearings in front of the Chula Vista Planning Commission and City Council, there wasn't a single speaker in opposition to our project. Over one hundred (100) neighbors submitted letters of support for our project. El Dorado Ridge was approved unanimously.

San Diego County has a growing crisis in the affordable housing, and as a responsible developer we feel obligated to assist.

The city of Chula Vista has an "inclusionary housing" ordinance. Anyone that builds 50 or more housing units must provide that 10% of the units are affordable.

City staff is discussing whether they would prefer that we build the affordable units on site, or assist the goal of affordable housing in another way, such as paying an in-lieu fee. We have told the city that we are willing to do whatever they feel is appropriate to meet our affordable housing obligation.

This grass roots type of "cooperative community based planning" is more expensive and more time consuming than just muscling a project through the normal political process. But for developers who adopt this philosophy that neighbors are allies not adversaries, the results can be very satisfying.

The Planning Commission and City Council like to know that a project being recommended for approval by the planning staff is supported by the neighbors. Chula Vista is going to continue to grow. The challenge for real estate developers, city planners, municipal leaders and residents is to accommodate that growth without sacrificing our community's quality of life.

"Cooperative community based planning," which includes the participation of neighbors and of community interest groups such as Crossroads II, is the proverbial "WIN-WIN" situation for city planners, community members and the real estate development industry.

City of San Diego
Planning Commissioner Moden

planning@sandiego.gov

RE: ITEM 2: * BELLA MAR APARTMENTS – COASTAL COMMISSION
MODIFICATIONS TO THE OTAY MESA-NESTOR COMMUNITY PLAN
AND LOCAL COASTAL PROGRAM – PRJ # 0631240

A “yes” vote on the planned 380-unit Bella Mar Apartments in Nestor, is a vote to provide workforce affordable housing to our community. I urge you to vote to approve the Bella Mar project.

Respectfully,

A handwritten signature in black ink, appearing to read "Mark W. Scott", with a long horizontal flourish extending to the right.

Mark W. Scott

Broker

Encore Realty, Inc.

DRE # 01308692



September 20, 2024

Planning Commission
 City of San Diego
 1222 First Avenue, MS 501
 San Diego, California 92101
 Sent Via Email: planningcommission@sandiego.gov; bhafertepe@sandiego.gov

Subject: September 26, 2024, Planning Commission Hearing
 Agenda Item No. 1 (PRJ-697307 Clairemont Village)
 Applicant Response to Clairemont Community Planning Group Recommendations

Dear Planning Commission,

On October 8, 2022, the Owner/Applicant (Clairemont Village Quad LLC) project team presented project details to the Clairemont Community Planning Group. The committee board voted 6-1-0 in favor of recommending approval of the project with inclusion of three recommendations as presented below. The Owner/Applicant requests that the Planning Commission reject these three recommendations as project conditions for the reasons stated below.

Recommendation 1: Compliance with SD Municipal Code 131.0552 regarding transparency.

Response: Per San Diego Municipal Code (SDMC) Table 131-05E – Development Regulations for CC Zones, Transparency does not apply within the CC-1-3 Zone, therefore, this is not a requirement for the proposed project. City staff has confirmed this information and agrees that transparency requirements do not apply to this project.

**Table 131-05E
 Development Regulations for CC Zones**

Development Regulation [See Section 131.0530 for Development Regulations of Commercial Zones]	Zone Designator	Zones															
	1st & 2nd >>	CC-															
	3rd >>	1-	2-	4-	5-	1-	2-	4-	5-	1-	2-	4-	5-	2-	3-	4-	5-
	4th >>	1			2			3			4						
Transparency [See Section 131.0552]		---	---	---	---	---	---	---	---	---	---	---	---	---	---	applies	

However, the building frontage along Field Street contains the resident leasing office and lobby/mail room. As demonstrated on Plan Sheet A2.91, 79 percent of the wall area between 3 and 10 feet above the sidewalk will be transparent, which is in line with SDMC Section 131.0552. In addition, the design team has incorporated landscaping and decorative building materials into the project along Cowley Way to soften and screen the building façade from public views, including the use of perforated backlit decorative metal panels, vertical-growing plant materials, a green screen, and street trees. Please see Attachment 1: Site Rendering at Field Street and Cowley Way.

The proposed development project is not subject to SDMC Section 131.0552 regarding transparency. Regardless, the proposed project design is complementary to transparency requirements and sensitive to the concerns of the surrounding neighborhood. Therefore, the Owner/Applicant maintains that this recommendation is not necessary to include in the project Conditions of Approval.



Recommendation 2: Bring the entire 12+ acre site into compliance with SD Municipal Code Chapter 14, Article 2, Division 4 landscape regulations.

Response: SDMC Chapter 14, Article 02, Division 04 – Landscape Regulations would apply to the 12.96-acre project site since the proposed structure exceeds 1,000 square feet and the gross floor area on the whole of the site is increasing by over 100 percent. However, the project is requesting a deviation from SDMC Chapter 14, Article 02, Division 04, Landscape Regulations for only the 2.67-acre Area of Impact to comply with the Landscape Regulations, whereas 12.96 acres would be required.

The Area of Impact for the proposed project currently contains a surface parking lot and a small portion of existing commercial space, totaling 2.67 acres within the 12.96-acre shopping center. The project will develop the existing, underutilized surface parking lot with the proposed residential building, and demolish 3,770 sf of the existing commercial space to accommodate the required fire access lane. The residential development site and its corresponding frontages along Field Street and Cowley Way will comply with the City’s Landscape Regulations.

There is existing, mature landscaping along Clairemont Drive, Burgener Blvd, and Field Street. In addition, the shopping center already contains established landscape areas in front of the shops and anchors, as well as landscaped planters and islands throughout the parking lot. Please see Attachment 2: Photographs of Existing Commercial Landscape (June 2024). Between 2017 to 2021, the Clairemont Village Shopping Center underwent extensive redevelopment/remodeling which included interior tenant improvements, renovations of the building facades, hardscapes, and site landscaping, and minor private improvements throughout the shopping center. Public improvements included reconstructing curb ramps and driveways on fronting streets (Clairemont Drive, Field Street, and Cowley Way) and were not subject to additional City Landscape Regulations.

As demonstrated in Attachment 3: Public Improvement Impact Exhibit, enforcement of current street frontage landscape regulations on the proposed project would result in substantial negative impacts to the existing shopping center and is not feasible. A summary of presumed impacts from dedicating additional land to accommodate current regulations includes:

Removed Parking Spaces	45 spaces (infeasible per tenant legal agreements)
Removed Mature Trees	49 trees
Relocated Water Meters	8 meters
Relocated Backflow Preventers	8 units
Relocated Irrigation Equipment	5 valves
Relocated Fire Hydrants	2 hydrants
Relocated Electrical Vaults	5 vaults
Relocated Electrical Risers	7 risers
Relocated Street Lights	3 lights
Relocated Traffic Signs	12 signs
Relocated Traffic Signals	1 signal
Relocated Underground SDGE Powerlines from Field Street to Clairemont Drive (unknown feasibility; prohibitive costs)	

Therefore, in coordination with Development Services Department management, it was determined that the Owner/Applicant could proceed with the subject project focusing landscaping efforts on the new portion of development only. The Owner/Applicant acknowledges the responsibility to retain all landscaped areas outside of the Area of Impact in their existing state, in conformance with previous site

permits and in alignment with lease agreement obligations between the Owner/Applicant and existing commercial tenants.

Existing landscaping within the Area of Impact will be removed and new landscaping installed per the Preliminary Landscape Plan. It has been determined that within the 2.67-acre area of work, the proposed new landscaping is consistent with the regulations of applicable SDMC sections 142.0403 - 142.0407, 142.0409, and 142.0413. This includes street yard planting, remaining yard planting, vehicular use area planting, street trees, and water conservation. Furthermore, approval of the requested deviation will facilitate a project that efficiently utilizes the subject property, provide on-site affordable housing and provides a use consistent with the Commercial designation of the Clairemont Mesa Community Plan.

With approval of the requested deviation, the proposed development project will comply with SDMC Chapter 14, Article 2, Division 4 Landscape Regulations, as applicable, and this recommendation is not necessary to include in the project Conditions of Approval.

Recommendation 3: If feasible, implement a shuttle to take residents from the project site to the trolley station at Morena Blvd and Clairemont Drive.

Response: There are no rules and regulations in the San Diego Municipal Code that require shuttle services for any residential development. In addition, there are no recommendations and policies in the General Plan or Clairemont Mesa Community Plan which require implementation for shuttle services for the project. City staff have confirmed this information and agree that this project does not warrant the imposition of a shuttle service from the residential building to the trolley station.

The project site is within the CC-1-3 Zone which promotes a pedestrian-friendly environment. The project contains specific conditions of approval which will utilize alternate modes of transportation such as walking, bicycle, and sufficient access to public bus transit. Conditions of approval regarding alternative modes of transportation include: constructing a mid-block curb ramp adjacent to the site on Cowley Way; constructing a bus stop slab adjacent to the site on Clairemont Drive; and reconstructing the existing contiguous sidewalk to a 10-foot wide parkway with a 5-foot wide non-contiguous sidewalk, curb, and gutter on Cowley Way; restriping installation of pedestrian countdown signal heads on all approaches at the intersection of Clairemont Drive and Iroquois Avenue. The specific conditions listed above will result in public improvements that will enhance alternative modes of transportation and upgrade the circulation network within the Clairemont Mesa Community Plan area.

The Owner/Applicant has carefully evaluated the CCPG recommendation and disagrees with the need to implement a project shuttle. Several factors impact the feasibility of implementing such a service, as follows.

Demand: Current statistics indicate that 85 percent of apartment residents either use a private vehicle or work from home, while 14 percent either ride the bus or subway, or walk or bike, as their primary means of transportation. Only one percent of apartment residents utilize trolley, light rail, or streetcars.¹ Assuming the vast majority of residents rely on personal vehicles, existing public transportation, biking,

¹ Source: National Multifamily Housing Council Tabulations of 2022 American Community Survey microdata, US Census Bureau. Updated November 2023. Website: <https://www.nmhc.org/research-insight/quick-facts-figures/quick-facts-resident-demographics/transportation-to-work-telecommuting/>. Accessed June 2024.



or walking to meet their commuting and recreational travel needs, a private shuttle providing access to the trolley station for such a small portion of the project population cannot be justified.

Competition: Availability of other transportation options, such as ride-sharing services or public transit, already exist and readily serve the project area. These existing services are accessible and convenient and may impact resident preferences. Ride-sharing services, such as Uber or Lyft, are on-demand and can meet the unique needs of the rider(s), as necessary. Users do not need to coordinate within the confines of a schedule, and many users appreciate the level of flexibility and control that comes with ride-sharing services.

For those that prefer public transit or a more affordable option for shared transportation, there are existing bus stops located adjacent the Clairemont Village Shopping Center (next to Starbucks and directly across Clairemont Drive). These buses (SDMTS Bus Route 105 northbound and southbound) serve the route along Clairemont Drive to Morena Boulevard with an existing transit stop at the Clairemont Drive Trolley Station, and continued service to the Old Town Transit Center. They run hourly in each direction from approximately 5:00 AM to 10:00 PM every day and are conveniently accessible from the commercial center and proposed project site via existing pedestrian pathways.

Costs: The initial investment and ongoing operational expenses associated with a shuttle program would be substantial. These include vehicle acquisition, fuel, insurance, maintenance, and driver salaries.

Space Constraints: The property layout must accommodate shuttle stops, parking, and maneuvering space. As detailed throughout the Plan Set, project circulation is constrained by development regulations, feasible building configuration, and site layout. There is no space to accommodate a dedicated, convenient shuttle pick up/drop off zone. Again, as discussed in the Competition section above, there are already bus shelters (with seating, canopy structure to protect from weather conditions, and trash receptacles) on each side of the street along Clairemont Drive adjacent to the subject property, which provide public transit pick up/drop off zones.

While the Owner/Applicant recognizes the intentions of the community group in recommending a shuttle service, if feasible, Owner/Applicant asserts that it is unnecessary and infeasible to implement such a service for the anticipated low demand in relation to the excessive costs. Therefore, the Owner/Applicant maintains that this recommendation is not necessary to include in the project Conditions of Approval.

Sincerely, on behalf of the Owner/Applicant,

Sally Schiffman

Sally Schiffman
Owner and Principal Planner
WSM Land Development Solutions

Attachment 1: Site Rendering at Field Street and Cowley Way
Attachment 2: Photographs of Existing Commercial Landscape (June 2024)
Attachment 3: Public Improvement Impact Exhibit





Attachment 1: Site Rendering at Field Street and Cowley Way





The Residence at Clairemont Village



Attachment 2: Photographs of Existing Commercial Landscape
(June 2024)



Perimeter Commercial Landscaping

(Photos Taken June 2024)



Parking Lot Commercial Landscaping

(Photos Taken June 2024)





Attachment 3: Public Improvement Impact Exhibit



PUBLIC IMPROVEMENT IMPACT EXHIBIT CLAIREMONT VILLAGE

LEGEND

ITEM	SYMBOL
EXISTING ELECTRICAL LINE	
EXISTING PROPERTY LINE	
EXISTING RIGHT-OF-WAY LINE	
PROPOSED RIGHT-OF-WAY LINE	

EXISTING PARKING COUNT

STANDARD PARKING	630 SPOTS
ADA PARKING	24 SPOTS

Urban Parkway Configurations

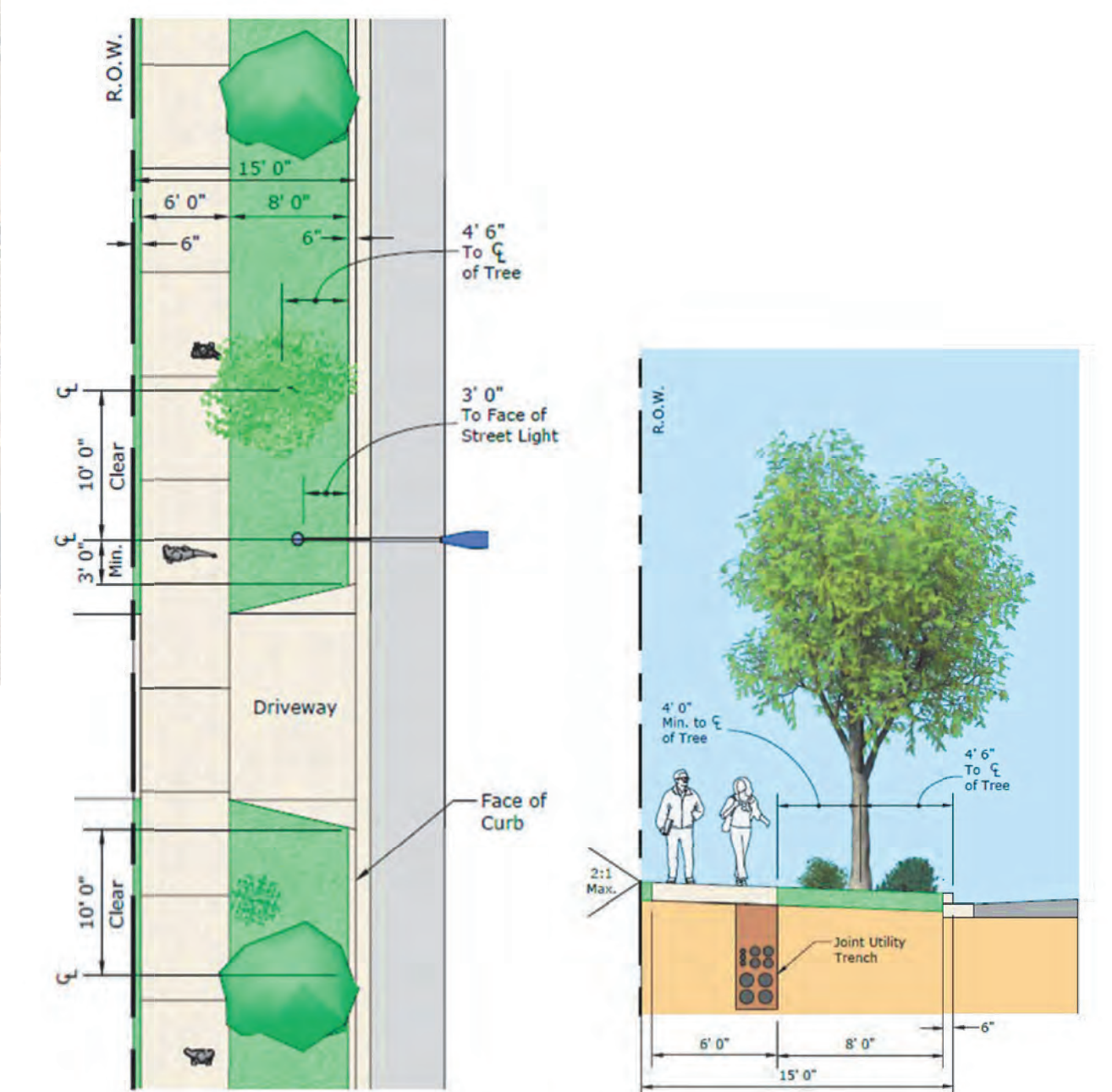


FIGURE 5-4. 15' PARKWAY NON-CONTIGUOUS SIDEWALK

PROPOSED 15' PARKWAY ALONG CLAIREMONT DRIVE

NOTE:

SEE EXHIBIT E-2 FOR PROPOSED 12' PARKWAY ALONG BURGNER BOULEVARD, FIELD STREET, AND COWLEY WAY

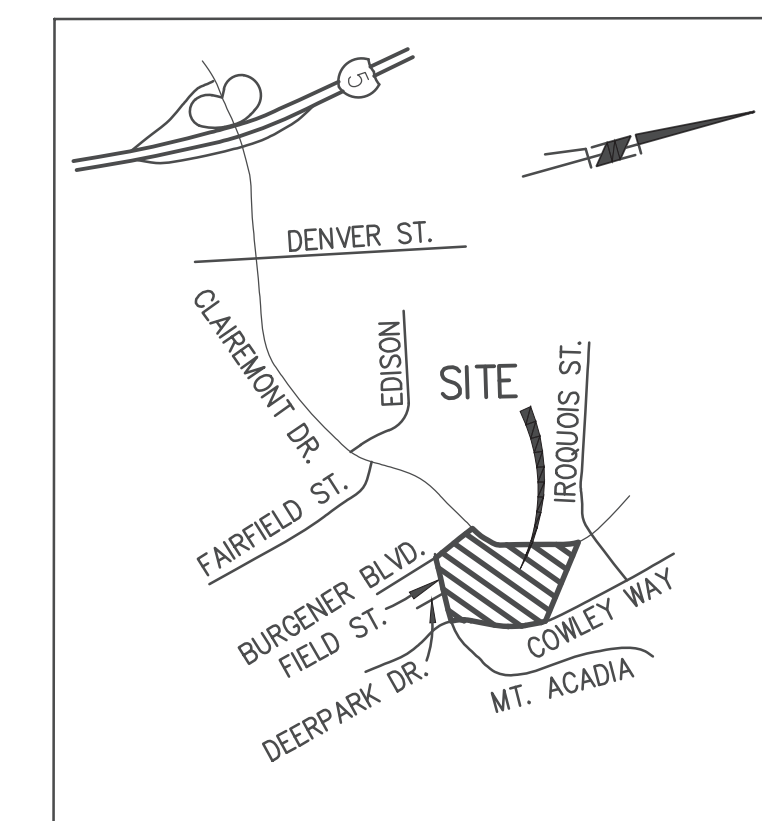


OVERALL PUBLIC IMPROVEMENT IMPACT EXHIBIT

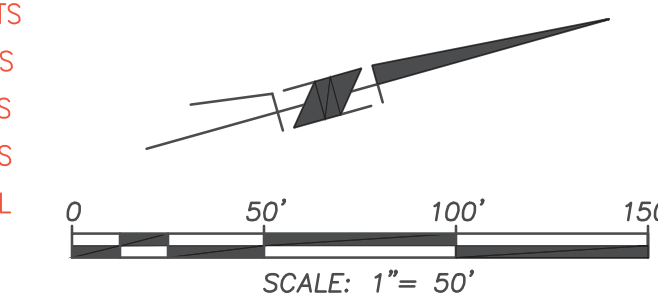
SCALE: 1" = 50'

DEDICATION IMPACTS

IMPACTED PARKING	45 SPOTS
REMOVE AND REPLACE TREES	49 TREES
RELOCATE WATER METERS	8 METERS
RELOCATE BACKFLOW PREVENTERS	8 UNITS
RELOCATE IRRIGATION EQUIPMENT	5 VALVES
RELOCATE FIRE HYDRANTS	2 HYDRANTS
RELOCATE ELECTRICAL VAULTS	5 VAULTS
RELOCATE ELECTRICAL RISERS	7 RISERS
RELOCATE EXISTING STREET LIGHT	3 LIGHTS
RELOCATE EXISTING TRAFFIC SIGNS	12 SIGNS
RELOCATE EXISTING TRAFFIC SIGNAL	1 SIGNAL



VICINITY MAP
NO SCALE



SYMBOL	ITEM
	PROPOSED COMMERCIAL DRIVEWAY PER SDG-163
	PROPOSED PEDESTRIAN CURB RAMP PER SDG-133
	PROPOSED CONTINENTAL CROSSWALK MARKING PER SDM-116

ENGINEER OF WORK/
APPLICANT
NOVA ENGINEERING
4373 VIEWRIDGE AVENUE
SAN DIEGO, CA. 92123 PHONE:
(619)-296-1010

MELLOR R. LANDY

PROJECT NAME: CLAIREMONT VILLAGE
SHEET TITLE: PUBLIC IMPROVEMENT IMPACT EXHIBIT
DATE PREPARED: JANUARY 13, 2022

ARCHITECT:
AD ARCHITECTS
144 NORTH ORANGE STREET
ORANGE, CA. 92866
PHONE: (714)-639-9860

OWNER:
CLAIREMONT VILLAGE QUAD, LLC
KLEEGER ENTERPRISES
12625 HIGH BLUFF DRIVE, SUITE 310
SAN DIEGO, CA 92130
PHONE: (858)-481-3081

BRUCE KLEEGER

NO.	DATE	REVISION	SHEET 1 OF 2
1	01/13/2022	OVERALL PUBLIC IMPROVEMENT IMPACT EXHIBIT	E-1
2			
3			

LAW OFFICE OF JORDAN R. SISSON

LAND USE, ENVIRONMENTAL & MUNICIPAL LAW

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September 26, 2024

VIA ONLINE: <https://www.sandiego.gov/planning-commission/agenda-comment-form>

RE: Item 3, USD Master Plan Amendment (PRJ No. 1099954)

Dear Chair Modén and Planning Commissioners:

On behalf of SEIU Local 721 (“**Local 721**”), this office respectfully provides the following comments¹ to the City of San Diego (“**City**”) regarding the proposed amendments to the University of San Diego (“**USD**”) campus Master Plan (“**Plan**”) and Conditional Use Permit (“**CUP**”), including modifications of five previously approved projects to increase student housing opportunities on the USD Campus.

Firstly, we thank the City Planning Commission for the opportunity to provide these comments and City staff for its communication about the status of this USD Master Plan amendment process. Additionally, Local 721 wants to make clear that it supports housing and believes universities must do their fair share to mitigate the housing demands caused by its student, faculty, and staff populations. Thus, *Local 721 is glad to see that the USD Master Plan is adding more housing opportunities for students.*

However, Local 721 has several concerns with the Project, as presented in the Staff Report and other relevant documents, including the CEQA consistency memo included as Attachment 7 of the Staff Report.² *Below are eight live issues and concerns with the proposed USD Master Plan amendment, followed by five recommendations to be incorporated into the Project:*

1. The majority of the revised projects—including projects 11, 23, 27, and 30—could allow the demolition of existing housing.³ While the replacement would be greater, there is no discussion or mitigation of the temporary loss of housing.
2. The Master Plan assumes a 65/35 split between undergrad and graduate students and that roughly 45% of the 10,000 full-time-equivalent (“**FTE**”) students would be housed on campus.⁴ However, it is unclear whether any of these assumptions are enforceable or proven accurate.

/ / /

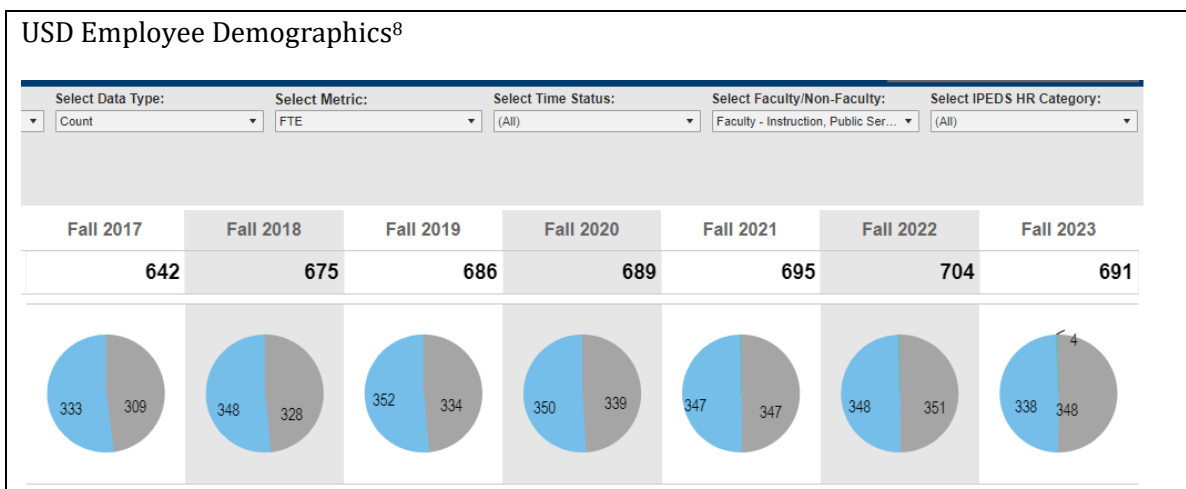
¹ Herein, page citations are either the stated pagination (i.e., “p. #”) or PDF-page location (i.e., “PDF p. #”)

² Including but not limited to the Project’s Planning Commission [Staff Report, Attachments 1-10, Attachment 11](#) (Draft USD Master Plan), and [Attachment 12](#) (Previous CUP Permit).

³ See [Staff Report](#), p. 4; [Attachments 1-10](#), PDF p. 62 (CEQA Consistency Memo Tbl. 1); [Attachment 11](#) (Draft USD Master Plan), PDF p. 5 (Fig. 1 showing existing buildings), p. 7 (Fig. 2 showing new buildings), p. 10 (Figs. 4 and 5 showing amended projects), p. 19 (Fig. 9 showing existing buildings to be demolished).

⁴ [Attachment 11](#) (Draft USD Master Plan), PDF p. 53 (section 5.1).

- Throughout the revised Master Plan, the term “on campus” has been added to qualify FTE student caps.⁵ This could lead to a significant undercounting of USD headcount that is not accounted for in the FTE cap despite inducing housing demands and added vehicle trips, such as a part-time student taking both online and on-campus courses. The City should consider whether FTE or headcount or both are more appropriate in light of changing circumstances in how students study and commute post-COVID (e.g., more hybrid/remote participation) and changes in traffic impact analysis (discussed infra).
- The Master Plan assumes there will be no change in the cap on the student FTE or faculty and staff FTE (677 and 1724, respectively).⁶ However, it appears that Faculty FTE has already surpassed that 677 FTE assumption.⁷ For example, the employee demographic table provided on USD’s own website shows faculty has exceeded the 677 faculty FTE cap since Fall of 2019, with 691 FTE (or 1,075 headcount) as of Fall of 2023. (See excerpt below.)



- The Master Plan amendment does not address the induced demand of USD’s non-student population. USD’s faculty (tenured and non-tenured), as well as staff (full-time and part-time), have housing needs. When these populations cannot access affordable housing opportunities near campus, they must resort to finding housing opportunities in distance communities, which in turn generates significant vehicle miles traveled (“VMT”), and associated air and greenhouse gas (“GHG”) emissions.
- The CEQA Consistency Memo does not provide a VMT analysis (relying on a level of service (“LOS”) metric instead), but states that the average daily trips (“ADT”) per student FTE have dropped and that increased on-campus housing has the effect of reducing VMTs.⁹ However, this analysis does not address ADTs and VMTs from the non-student population,

⁵ Attachment 11 (Draft USD Master Plan), PDF pp. 53-54.

⁶ Ibid., PDF p. 53 (Tbl. 2 campus population).

⁷ See e.g., National Center for Education Statistics, IPEDS data (685 FTE primary instructors in 2022), <https://nces.ed.gov/ipeds/datacenter/facsimileView.aspx?unitid=122436&goToReportId=6&year=2022&surveyNumber=9>;

⁸ <https://www.sandiego.edu/ire/diversity-dashboard/employees-diversity.php>.

⁹ Attachments 1-10, PDF pp. 65-66.

such as faculty and staff. Nor does the referenced 2024 traffic study look at the non-student population.¹⁰

7. There is a live question of whether on-campus FTE is the most appropriate metric to base housing and traffic impact. FTE may be relevant from a LOS or parking context, where the concern is the maximum congestion at a nearby intersection or the maximum on-campus parking needs at any given time. However, part-time students and/or students with a hybrid schedule (i.e., taking in-person and online courses) may generate vehicle trips, VMTs, and housing needs no less significant than a traditional full-time campus student. For example, a part-time graduate living on campus may need on-campus housing equivalent to a conventional FTE graduate student. Similarly, an undergraduate student taking a portion of online courses can have similar on-campus housing needs as important as a traditional FTE undergrad student taking a full in-person course load. So too, three part-time staffers traveling long commutes are can be more significant than the equivalent of a single full-time staffer. A more holistic view of USD's population and VMT impacts seems appropriate.
8. Project 22 reduces the size of the proposed new academic building. However, Local 721 members, including non-tenured faculty members, have faced challenges in finding adequate office and academic space at the USD campus's existing academic/office buildings. This has occurred despite nearly twenty years of new development at USD, including seven academic buildings—as noted on the revised Master Plan.¹¹ Despite this development, there is still an urgent need for academic space that has been unmet.

In sum, Local 721 supports housing but believes more can be done here to address the abovementioned live issues with feasible measures. Therefore, we respectfully request that the Planning Commission make the following recommendations to the City Council for consideration with the Master Plan/CUP amendment approval:

1. The Master Plan should include safeguards against the potential interim loss of student housing and compliance with fundamental student housing beds and assumptions of the Master Plan, such as:
 - a. Before removing existing beds, requiring the construction of replacement beds on campus;
 - b. Providing a clear performance level of minimum beds per student; and
 - c. Requiring an annual public hearing to review USD's compliance with the Master Plan, including FTE and housing assumptions and commitments.
2. Assess the FTE and headcount growth of the USD population, including student and faculty and staff populations, and review of prior USD annual reports to the City. This should be feasible given this has been part of past USD mitigation.¹² This should consider each population category and the potential housing demand and VMT implications (respectively).

¹⁰ LLG (4/10/24) Traffic Study, <https://sandiego.nextrequest.com/documents/37847962>.

¹¹ Attachment 11 (Draft USD Master Plan), PDF p. 20.

¹² See Attachments 1-10, PDF p. 90 (Tra-1); Attachment 12 (Previous CUP Permit), PDF p. 13 (Conditions 69-70)

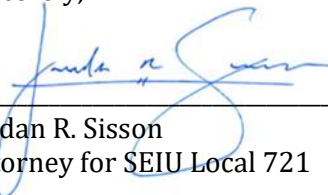
3. The above analysis should consider the housing impacts to the non-student housing population and consider potential strategies to minimize the induced demand for housing, such as requiring USD:
 - a. Access to USD's Faculty Home Buying Assistance Program for non-tenure track faculty;
 - b. Faculty rental housing subsidy to offset otherwise unaffordable market rents for non-tenure track faculty;
 - c. Securing off-campus housing and make it available at affordable rates for non-tenure track faculty;
 - d. Making some of the on-campus housing available to faculty or staff;
 - e. Coordinating with the City to find affordable housing opportunities; and
 - f. Other potential strategies.

4. We ask for enhanced and feasible VMT-reduction measures, including a USD mandatory commuter reduction program featuring:
 - a. 100% participation of faculty and staff
 - b. Specific performance level of VMTs to be reduced;
 - c. Provide incentives for employees carpooling, such as free preferential parking spaces;
 - d. Subsidized transit passes;
 - e. Enrollment in guarantee ride programs to ensure employees taking public transit can respond to emergencies;
 - f. Dedicated shuttle service to nearby destinations; and
 - g. Other measures that encourage VMT reductions, such as promoting car-sharing, bike sharing, and other ride-sharing programs.

5. Consider solutions to utilize better academic spaces, such as dedicating a percentage of the new academic building (i.e., project 22) to the needs of non-tenured faculty and/or allocating a percentage of other academic buildings to the realistic usage needs of non-tenured faculty.

Thank you for consideration of these comments. We ask that this letter is placed in the administrative record for the Project.

Sincerely,



Jordan R. Sisson
Attorney for SEIU Local 721