

Report and Recommendations of the University Community Planning Group on the Draft-University Community Plan

University Community Planning Group

May 15, 2024

Introduction

The Draft University Community Plan (D-UCP) was introduced to the public at the April 9, 2024, meeting of the University Community Planning Group (UCPG). It is detailed, comprehensive and complex.

The Draft-UCP has many strengths and also areas for improvement.

The University Community Plan Update (UCPU) has been ongoing for five and a half years. The process began in October 2018 with a well-attended community workshop. A University Community Plan Update Subcommittee of the UCPG was selected by the City of San Diego in October 2018. The Subcommittee began regular monthly meetings in January 2019. It held over 40 public meetings to organize community feedback. The UCPU Subcommittee provided regular monthly updates to the UCPG.

The process has been dynamic, including the involvement of two mayors, three city council members, three Planning Department directors, and five community planners, in addition to multiple Planning Department section directors, urban designers, parks planners, traffic engineers and other city staff.

The **UCPU Subcommittee of the UCPG** has been the one consistent public body engaged with the process. Members are volunteers representing the interests of the University Community Planning Group, residents, businesses, community and business organizations (University City Community Association, Friends of Rose Canyon, Biocom California), UCSD and MCAS-Miramar. Collectively, members of the Subcommittee have devoted thousands of hours to the future of the University Community during the last five and a half years.

This Report reflects the recommendations of the Board of the UCPG in response to the Draft University Community Plan. It builds on earlier reports approved by the UCPU Subcommittee on June 20, 2023, and by the Board of the UCPG on July 11, 2023.

This Report was approved by the Board of the UCPG on May 14, 2024 by a vote of 11-0-0.

The Report includes general principles and specific recommendations of the UCPG for revisions to the Draft UC Plan. It focuses on Urban Design and Land Use, Commercial Plazas, Affordable Housing, Displacement, Mobility, Parks and Recreation, Sustainability, and Implementation. The Report includes Alternative Views where there were differences of opinion among members of the UCPU Subcommittee in 2023. Alternative views are clearly marked and do not represent the opinion or recommendation of the UCPG.

This Report references specific pages and policies of the Draft University Community Plan, which can be found here: <https://www.planuniversity.org/>

A **Table of Contents** can be found on page 3.

Table of Contents:

p. 4:	Summary of Subcommittee Work and Recommendations
p. 10	UCPG Recommendations:
p. 10	I. Commercial Plazas, South University City
p. 15	II. Commercial Plazas, Plan Area as a Whole
p. 16	III. Commercial Plazas, Nobel/Campus Area
p. 17	IV. Nobel/Campus Area – General Recommendations
p. 17	V. Affordability and Displacement
p. 21	VI. Mobility
p. 24	VII. Parks and Recreation
p. 39	VIII. Sustainable Community – Open Space, Greening, Urban Forest, Watersheds, Wildlife Corridors, Canyon Adjacent Development. (p. 49)
p. 57	IX. Policy Recommendations: Parks and Recreation, Open Space/Conservation
p. 64	X. Implementation

Summary of Subcommittee Work and Recommendations:

The **Draft University Community Plan (D-UCP)** includes the following **Vision and Guiding Principles**, reflecting the input of the community and UCPU Subcommittee.

Vision and Guiding Principles: (see Draft-UCP, p. 13).

Vision:

“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.”

Guiding Principles:

- 1) **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.
- 2) **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.
- 3) **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.
- 4) **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.
- 5) **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.
- 6) **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.

Strengths of Draft-University Community Plan

The Draft-UCP includes significant steps to meet this Vision and Principles.

It Includes:

- Potential for significant new commercial and residential development. It reaffirms the goal of the UCPG for fair and equitable housing with projects that will provide housing near transit and jobs, and importantly includes minimum requirements for on-site affordable housing specific to the University Community.
- Plans for robust new bike and pedestrian infrastructure, mostly in the street rights of way where it belongs, including protected bike lanes on key corridors.
- Improved interface between UC and UCSD East Campus
- Flexibility for development through new “Mixed Use” zoning, which allows property owners to respond to their estimation of the market at a given time.
- Potential for progress toward the city’s Climate Action Plan through greater density of development, potential for more people to work and live in the same community and transit oriented development near the Mid-Coast Trolley.
- Improved open space protection. The D-UCP proposes open space dedication for four parcels of city owned land in Rose Canyon and Sorrento Valley/Roselle Canyon, which have been a priority of the UCPG. The UCPG voted unanimously in July 2020 to support dedication of these parcels (see UCPG Minutes, July 2020). The Draft-UCP proposes MHPA boundary line corrections that will expand habitat protection.
- Potential for three new Linear Parks on Regents Road and Governor Drive and a pedestrian promenade on Executive Drive.
- Incentives for onsite Urban Public Spaces for commercial developments
- Shopping centers revitalized but not replaced.

Areas of Special Concern:

The UCPG Report emphasizes several key areas of concern.

Housing and Commercial Development

New housing has been an area of intensive discussion and debate. The proposed plan includes land use changes with potential for the development of new multi-unit housing. At full build out, the Draft-UCP would provide room for up to **30,480 new housing units** and an estimated **72,000 new jobs** (~20 million square feet of commercial real estate) (**p 46**). This is approximately twice the residential and commercial intensity of the current UC Plan.

The D-UCP does not include consideration of the alternative **Community Planning Group Subcommittee Input Scenario** (“alternate” Discussion Draft, Appendix) which **would** provide room for approximately **22,500 new dwelling units** and **55,000 jobs** (~19 million square feet of commercial real estate).

The Final UCP should correct this mistake by including the **Community Planning Group Subcommittee Input Scenario** as one of its feasible **alternatives in the Final EIR**.

The D-UCP housing potential is in addition to the **more than 11,000 units of new housing** (“beds”) completed or under construction at **UCSD** since the start of the update in 2018.¹

Under either alternative, the **UC Plan would include potential for more new housing and commercial development than any community plan area in the city**.

These potentials meet the goal established by the city and SANDAG in 2018 as part of a grant agreement that has supported the update process. This grant set a goal of 10,000-30,000 new units. The Draft-UCP would meet or exceed that target under either alternative. The D-UCP envisions potential housing for up to **65,360 new residents**, compared to approximately **64,206 residents in 2020** (p 46). For context, the population of the City of San Diego grew by approximately 79,000 between 2010 and 2020 (U.S. Census). SANDAG Series 15 forecast projects San Diego to add **~65,345 residents by 2050** (SANDAG).²

Affordability and Diversity of Housing

A major concern of the UCPG, which the city has incorporated in the Draft-UCP, is the affordability of housing, new and overall. The Draft proposes a UC-specific inclusionary affordable housing requirement above and beyond the city requirement. UCPG supports a robust policy to ensure we have affordable housing where our jobs are (see Recommendations in Section V. below).

Displacement

A second concern is the potential for displacement of existing housing and community serving retail and services. Similar concerns with transit-oriented displacement and gentrification have been raised by community groups and planners nationwide.³

The University Community Planning Group has specific concerns with:

¹ The UCSD student body was approximately 43,000 in 2023, an increase of approximately 14,000 students since 2010. Approximately 40 percent lived on campus in 2021, short of the University’s goal of housing 65% of students on campus by 2035.

² 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>

³ E.g., Dwayne Marshall Baker and Bumsoo Lee, “How Does Light Rail Transit (LRT) Impact Gentrification? Evidence from Fourteen US Urbanized Areas” *Journal of Planning Education and Research*, vol 39 Issue 1, March 2019.

- Protections against the displacement of lower and moderate-income renters in the lowest priced housing in the UC Plan Area.
- Protection and expansion of community-serving retail and services to meet the needs of the projected population.

One place where the issue of displacement comes into focus is the Nobel/Campus area, in particular the two commercial plazas adjacent to the Nobel Drive Trolley station west of I-5, which are the principal community shopping areas in north UC.⁴

The UCPG is concerned that the Draft-UCP’s proposed employment mixed-use designation (EMX-2) for these plazas unnecessarily puts housing and community-serving retail in competition with more competitive uses such as biotech and high-tech business.⁵ The community is mindful of the recent closure of grocery and other community serving retail at the Costa Verde Center, adjacent to the Trolley terminus at UTC, under just such pressure.

If the city is serious about housing in this plan, it should not lose the historic opportunity to redevelop the Nobel/Campus area plazas with community serving retail and housing. The plan provides abundant new space for research and development, industrial, and other employment growth in other parts of the plan area.

The UCPG recommends a land use designation of Community Village rather than Employment Mixed-Use to protect community serving retail and promote housing in this location.

A second location where these concerns have drawn intensive community feedback are the commercial plazas in south University City. **A top priority is to preserve the groceries, pharmacies, and other small service and retail businesses located there.** These form the backbone of this part of the community.

The UCPG supports community feedback regarding protection of community serving uses, lower overall densities, adequate building transitions including rear and side setbacks, step backs in building height, and height limits scaled to the surrounding neighborhoods.

Notably, **these features are evident in all the visual images used by the Planning Department to depict redevelopment** in these areas. **They should be reflected in the actual planning criteria** for these locations as well.

A third concern, reflected in the Community Planning Group Subcommittee Input Scenario (Discussion Draft, Appendix) focuses on **displacement of the most affordable housing and the people who occupy it.**

⁴ “La Jolla Village Square” and the “Shops at La Jolla Village”

⁵ EMX-2 would allow but does not require housing. The D-UCP states that: in “*Urban Employment Villages, employment would be the primary use.*” p. 36.

The plan's housing goal of a diverse and inclusive community (Guiding Principle #3) is undermined if affordability is compromised and the least expensive housing in the plan area – which is also the most socially diverse in population - is replaced with luxury high rises.

Gentrification and displacement of a diverse community is a danger in University City as in other parts of San Diego. The UCPG has specific concerns with the **D-UCP potential for displacement of moderate-affordable rental housing at the southwest corner of Nobel Drive and Genesee Avenue** and to the west along Nobel Drive to Regents Road.

Density

For the Land Use and Housing Framework, the UCPG recommends a maximum of 143 dwelling units/acre in the University Community (compared to 218 du/ac in the D-UCP). By way of example, this density corresponds to the 6 to 12 story apartments in the Mesa Nueva section of the east UC San Diego campus, which demonstrates that dense, attractive, and affordable housing with green space and a vibrant street life may be developed in a format that serves all housing types from studios to three-bedroom family apartments. This local exemplar is the UCPG's model for future land use intensity and urban design in the north UC area.

Parks

The UCPG is deeply concerned about the large parks deficit proposed in the Discussion Draft. Even with roughly 3,350 recreational value points attributed to urban public space requirements for residential redevelopment, **the plan proposes a recreational points deficit of 4,100 – a shortage of facilities for 41,000 people.**⁶ The Report includes many recommendations to address this failure in the Discussion Draft.

Sustainability

The UCPG believes that the **Draft-UCP needs stronger language and policies to protect, enhance, and restore the biophysical environment and to integrate nature throughout the University Community Plan Area** – as the Plan's Vision and Guiding Principle #6 establish.

The University Community comprises some of the rarest and most fragile habitats in the most biodiverse metropolitan area in North America. The UC Plan must acknowledge and protect this critical status.

⁶ Figures reflect staff corrections reported to UCPG, 4/9/2024. The uncorrected Parks deficit reported in the D-UCP is 5,592 points, or recreational facilities for 56,000 people. See p 133, and Table 7, pp 206-213.

The **UCPG appreciates revisions incorporating many of its recommendations** in the D-UCP and recommends that the Final UC Plan include additional emphasis on habitat and biodiversity, native landscaping and wildlife, riparian areas, and watersheds. It should do so not just for lands in the Multiple Habitat Planning Area and Open Space Parks, but also community parks, mini parks, developed areas, urban design, greening, and forestry, street tree selection, medians, and other parts of the plan.

This Report includes specific recommendations to integrate this concern throughout the University Community Plan.

Mobility

The **UCPG supports robust, multi-modal transportation to help shift future transportation use and mode share, enhance public safety, and meet critical Climate Action goals.**

The UCPG supports protected bike lanes and pedestrian pathways along city streets that will make it safer to walk and bike through the community. The UCPG and UC Plan Update Subcommittee heard significant community concerns about the balance and practicality of planned roadway changes that may cripple existing auto and EV transportation – and community and commercial interests that rely on them - without commensurate increases in alternate transportation. The UCPG highlights the need for transparent and up-to-date analysis to support any proposed roadway changes before their incorporation in the Plan.

Implementation

The UCPG is deeply concerned that the Draft UCP lacks a specific Implementation plan. A fundamental principle of planning is that growth must be supported by infrastructure; however, the Draft lacks a transparent framework for the provision of infrastructure and public facilities necessary for future growth and required by city policy. The Draft does not explain how needed infrastructure will be paid for – including UCPG priorities such as parks and recreation facilities and protected bike lanes.

The **UCPG recommends that the Final University Community Plan outlines a clear plan for implementation** and that the city study and incorporate additional strategies for building needed infrastructure. These strategies may include the potential for a special supplemental development fee for infrastructure or additional/revised Supplemental Development Regulations (SDRs).

UCPG Recommendations: Draft University Community Plan (D-UCP)

I. Commercial Plazas, South University City

(University Square, Governor Dr and Genesee Ave – “Vons plaza”
University City Marketplace, Governor Dr and Regents Rd – “Sprouts plaza”)

la. Please incorporate the following general principles

- Reduced height limits (100' is not appropriate for these locations)
- Rear/side setbacks and step backs
- Concentration of development along major streets and away from adjacent residential uses
- Use of public open spaces as a buffer between uses
- Reduced overall densities
- Protection of neighborhood commercial retail and services (e.g., grocery stores)
- Commercial plazas zoned for community-serving retail with housing as a secondary use
- Provision of adequate off-street parking (one parking space per unit on site)
- Increased required square footage for commercial uses in redevelopment
- Guidelines for improved internal circulation - pathways between new housing and retail and neighboring uses - e.g., library/schools

lb. Please incorporate the following specific policies:

- University Square (Vons Plaza): **Reduce max. density to 54 du/ac. 50' height limit. 30' rear and side setbacks.**
- UC Marketplace (Sprouts Plaza): **Keep current zoned density at 29 du/ac. 40' height limit with 30' rear/side setbacks.**
- Three corner parcels at Governor/Genesee (SW, NW, NE): **Retain current zoning and height limits - 29 du/ac - and require 30' rear and side setbacks.**
- Southeast corner Governor/Genesee: **Density/height equivalent to adjacent plaza – 54 du/ac, 50' height limit.**

Justification:

UCPG recommendations make explicit the guidelines used in the city's published presentation materials, which formed the basis for public discussion throughout the Plan Update Process, 2018-23.

The visual diagrams used by the Planning Department to model potential redevelopment of the South UC plazas incorporate the same sensible guidelines recommended by the UCPG.

These same features are present in the Draft UCP. See images of a “Re-envisioned Shopping Center,” (p 91) and “Housing Integrated with Grocery and Neighborhood Serving Commercial,” (p 93).

Guidelines evident in these models include height limits, setbacks, step-backs, massing of new buildings toward main streets and away from adjoining residential uses, preservation of community-serving retail and off-street parking.

The images below were surveyed as part of the *Online Community Engagement Survey* (Fall, 2021) and presented as receiving support from 59% of respondents (CPUS Meeting, Feb 2022). These figures depict redevelopment with clear height limits, setbacks, step-backs, massing away from adjacent residences, adequate parking, and preservation of groceries and other community serving uses at a rate higher than 15% of total sf.

In the first diagram, the top row depicts the UC Marketplace (Sprouts) with the *same* footprint and setbacks as today. Both options include buildings of up to four stories, stepped back from the lot line and massed along Governor Drive and Regents Road with structured Parking. (Option A was selected for the city's Preferred Land Use Scenario).

Images in the bottom row and in the second diagram depict University Square (Vons) with buildings set back and stepped back from adjacent housing and massed along Genesee Ave and Governor Dr. The image shows a new *grocery* building with the same footprint as today, emblazoned with the sign, "Vons." Buildings rise to three-five stories with a five or six-story building on the corner of Governor and Genesee. Retail/Services are preserved on the ground floors (greater than 25%), structured parking is provided.

Governor Community Village

Existing: 700+ jobs
0 homes



Option A



Community Village

Option B



Neighborhood Village

SOURCE: (Planning Dept Presentation, September 2021; Online Community Engagement Tool, October 2021)

Option A



Community Village - Medium

Option B



Neighborhood Village - Medium Low



SOURCE: (Planning Department Presentation, Preferred Land Use Scenarios, CPUS Meeting, Feb 2022, p 31)

These same expectations should be written into the D-UCP in Plan Policies (p 166-71), Zoning, and SDRs (p 195).

Specific Recommendations:

Please incorporate the same planning guidelines in the Final-UCP that have been used throughout the plan update to depict redevelopment of commercial plazas.

SDR C.1, p 195 Building Transitions

- Thank you for incorporating UCPG recommendation control building transitions between a wider variety of low-medium density residential zones in UC:
- Please incorporate UCPG recommendation to include **30' rear/side set back setbacks and restore 45% building plane:**

-Revise SDR C.1, p 195 Building Transitions:

“Building height shall transition under an established **45-degree** angled building envelope plane sloping inward from the first 30 feet of a structure to the maximum structure height, for properties abutting **Low Density, Low-Medium Density, and Medium Density** residential areas designated in this community plan as shown in Figure 39. **Rear and side setbacks abutting residential uses should be a minimum of 30 feet.**”

- Please incorporate UCPG recommendation to include height limits.

Modify SDR C.1 p 195 to include maximum heights:

- 1 University Square (Vons Plaza): **50' height limit.**
- 2 Southeast corner Governor/Genesee: **50' height limit.**
- 3 UC Marketplace (Sprouts Plaza): **40' height limit**
- 4 Three corner parcels at Governor/Genesee (SW, NW, NE): **current**

- Please incorporate UCPG recommendation to reduce overall densities:
 - 1 University Square (Vons Plaza): **54 du/ac.**
 - 2 Southeast corner Governor/Genesee: **54 du/ac,**
 - 3 UC Marketplace (Sprouts Plaza): **29 du/ac.**
 - 4 Three corner parcels at Governor/Genesee (SW, NW, NE): **29 du/ac**
- Consider Zoning CC-3-5 versus CC-3-8 for 1 and 2 above
- Retain current Zoning for 3 and 4 above.

Plan Policies, Table 1, p 167-72

- Please incorporate UCPG recommendation to preserve community-serving retail:

- **Modify Policy 1.6 C, p 167**

Prioritize preservation of community-serving retail in existing commercial plazas. *When redeveloping a site with existing neighborhood retail and services, ~~consider retaining the same use or a similar uses.~~*

- Please incorporate UCPG recommendations:

- **Modify Policy 1.6C, p 167** to require replacement of neighborhood services.

“Redevelopment of existing neighborhood services **must include** replacement with a similar or the same use.

- **Modify Policy 2.4 D, p 168** to require open spaces as buffer between uses.

“**Require** Use open spaces, such as pedestrian plazas, paseos, greenways and courtyards, to serve dual functions as valuable community space and buffers between different uses.

- **Modify Policy 2.19A, p 172** to retain groceries on large commercial sites.

“Retain ~~g~~ Grocery stores on large sites **must be retained** where feasible.

- **Modify / Replace Policy 2.19D, p 172** to require off-street parking.

“New residents should be encouraged to use alternative transportation modes, but to limit impacts on surrounding neighborhoods, at least one parking space per dwelling unit must be required.”

- Thank you for responding to UCPG recommendation to delete unbundled parking.
- Thank you for responding to UCPG recommendation to address the need for stronger policy on building transitions (2.19D, p 172).
- Please strengthen policy with clear instructions regarding set backs, step backs, height limits, building transition, etc.

Modify Policy 2.19 D

“Promote strategies to transition height, density, and intensity between new development and existing residences through well designed set backs, stepbacks, context appropriate height limits, open space buffers and bike/pedestrian connections between new and old developments.”

- Please incorporate UCPG recommendation to:
 - **Modify SDR H.1 (p 196)** to apply to community commercial, community village and neighborhood commercial sites of 50,000 sq ft or more:
 - Delete 100,000 sf maximum.
 - Require 25% commercial/retail.
 - **NOTE: There DO NOT appear to be community village sites in the University Community to which it applies.**
 - One regulation is appropriate for community plazas over 50,000 sf.
 - Larger sites should provide commensurately more retail to serve larger UC population.

- Modify SDR H.1:

~~SDR-H.1 Community Serving Retail (Smaller Sites). Development with a residential use on a property designated community village in the University Community Planning Area that are equal to or greater than 50,000 square feet and less than 100,000 square feet in area shall maintain a minimum of 25 percent of gross floor area or 30,000 square feet of gross floor area, whichever of the two is less, for commercial services and retail sales uses.~~

- Delete SDR H.2, p 196.

~~SDR-H.2 Community Serving Retail (Larger Sites). Development with a residential use on a property designated community village in the University Community Planning Area that is equal to or greater than 100,000 square feet in area shall maintain a minimum of 30,000 square feet of gross floor area for food, beverage, and grocery use.~~

1c. In addition, the UCPG supports the principles of

- Limited development adjacent to MSCP lands (e.g., Canyon Adjacent Development,

below)

- Specific requirements for outdoor space in new projects (see Parks – Urban Public Spaces, below)
- A minimum affordable housing requirement (UC wide), on-site; no in-lieu fees (see Affordable Housing, section V. below).
- Strengthen language on coordination with school district to reflect need for greater transparency and specificity in coordination w SDUSD to service proposed growth, p. 160.

- Please incorporate UCPG recommendation for consistent zoning of religious institutions.

- The **default land use and zoning for places of worship** should be **Institutional** unless otherwise requested by the congregation themselves.
 - Places of worship should NOT be zoned to encourage them to leave the community.

Alternative views on the UCPU Subcommittee: (density, protection of groceries, zoning for religious institutions): Support policy to retain "community serving retail" but not to specify which uses. Market is changeable and we can't predict future needs. Support equivalent densities at Sprouts and Vons plazas. Sprouts is the more attractive for residential from a market perspective. Added housing in south UC gives more people access. New residents bring vitality to the community. Institutional zoning may limit flexibility of congregations to build housing on site or alternatively to sell and relocate.

II. UCPG Recommendations: Regulations for Commercial Plazas throughout the Plan Area.

Please incorporate UCPG recommendations for north UC commercial plazas.

- **UCPG** Supports similar standards for commercial plazas in North UC and South UC. (LJ Village Square/Shops at La Jolla Village, La Jolla Colony plaza, Renaissance Towne Centre, Costa Verde Center)
- Adopt Height limits (not specified); rear/side setbacks and step backs (30').
- Concentrate development toward main streets and away from adjoining residential areas.
- Use open spaces as buffers between uses.
- Protect neighborhood commercial services – i.e. grocery stores
- Provide adequate parking (one parking space per unit on site, no unbundled parking).
- Increase required square footage for commercial uses in redevelopment.

The UCPG supports the following specific policies (**see details in section I above**)

- **Modify SDR C.1, p 195** to include 30' rear/side setbacks.
- **Modify Policy 1.6C p 167** to require replacement of neighborhood services.

- **Modify Policy 2.4 D, p 168** to require open spaces as buffer between uses
- **Modify Policy 2.19A, p 172** to retain groceries on large commercial sites.
- **Modify/Replace Policy 2.19D, p 172** to require off-street parking with housing.
- **Modify SDR H.1, p 196** to apply to community commercial, community village and neighborhood commercial; sites that are 50,000 sq ft or more must have **25%** community commercial/retail.
- **Please delete SDR H.2, p 176.** (Sites over 100,000 square feet shall maintain a minimum of 30,000 sq ft for commercial use.) One policy is appropriate for community plazas over 50,000 sf. Larger sites should provide commensurately more retail to serve a larger UC population – not less.

Alternative Views on the UCPU Subcommittee: Parking minimums are generally a bad practice that encourages reliance on automobile transportation. Prefer that we focus on strategies to encourage alternative transportation modes as a more effective step to climate action goals. Do not support the proposal to apply step-backs and add setbacks for transitions between re-development and low-moderate to moderate density housing. Policy should apply just to development adjacent to single family residence zones. No recommendation on setbacks but remain skeptical.

III. UCPG Recommendations: Nobel/Campus Commercial Plazas

(LJ Village Square/Shops at La Jolla Village)

Please incorporate UCPG recommendations for Nobel/Campus commercial plazas.

UCPG Supports planning for development above City of San Diego Coastal Height Limit **with following conditions:**

- New maximum height limit - range of 85-100’.
 - **Zone for housing and community serving retail** (e.g., Community Village/Community Commercial) NOT employment mixed use (EMX-2). Avoid competition w biotech/high tech; preserve and expand community serving retail and housing on these two sites.
 - Density at 143 du/ac (same as Staff Scenario)
 - Adopt same general guidelines for UC commercial plazas, as above: similar setbacks, stepbacks; mass development away from neighboring residential uses; use urban open spaces to soften building transitions and minimize impact on adjacent residential uses; concentrate development away from Villa La Jolla Dr., Via Mallorca and condominiums to the south (all adjoining residential); protect community serving retail; preserve parking for residents/shoppers.
 - Plan for community or neighborhood-scale park (1-3 ac) as part of redevelopment.
 - Improve bike and pedestrian safety – Nobel/Villa La Jolla Dr/I-5
 - Include a pedestrian bridge over Nobel Drive.
 - Consider removing parking on all of Villa La Jolla Dr and on Nobel Dr. from Villa La Jolla to Genesee.
- Please incorporate the UCPG recommendation to remove reference to a street wall along Villa La Jolla Drive.

- p. 84, revise “Focused Enhancements: Growth Opportunities”

p. 84: “Orient buildings towards Nobel Dr. and Villa La Jolla Drive to create a consistent street wall.”

- Revise “Growth Opportunities” diagram p. 84, to reflect this change.

- Revise Policy 2.18 G, p 172.

Encourage orienting buildings towards Nobel Dr. and Villa La Jolla Dr. to create a consistent street wall.

Alternative views on the UCPU Subcommittee. Proposed densities are too high and unsustainable at this site due to lack of access to/from I-5 north of Nobel Dr. Congestion and bike/pedestrian safety at LJ Village Drive/Villa La Jolla/UCSD entrance are bad and will be worse. High density/high rise housing at this site will adversely impact adjoining residents to shopping centers.

IV. UCPG Recommendations: Nobel/Campus Area – General:

- Mixed uses and higher densities are appropriate for the parcels north of The Shops at LJ Village and fronting on Holiday Ct and La Jolla Village Dr.
- Pedestrian/bike safety issues are a grave concern here.
- Villa La Jolla/La Jolla Village Drive/UC Campus intersection is a choke point for traffic with poor bike/ped infrastructure. Lack of freeway access from Nobel to I-5 south will focus traffic from commercial plazas on Nobel Dr to this intersection.
- Plans must pay special attention to safety and connectivity between Campus and Nobel/Campus area along Nobel Dr, Villa La Jolla Dr. and La Jolla Village Dr.
- Recommend independent traffic study with up-to-date data to assess feasibility of mobility improvements planned with special emphasis on bicycle and pedestrian safety and accessibility to Campus.
- Recommend protected bike lanes to access these plazas.

V. UCPG Recommendations: Affordability and Displacement:

1. Affordable Housing Requirement:

The UCPG supports the following general principles:

- Affordability and diversity of housing are essential goals of the UCPG (see Priority #3, pp 26-27).
- The UCPG supports an inclusionary affordable housing regulation specific to the UC Plan Area – above that of City of San Diego, Chapter 14, Article 2, Division 13 of the Municipal Code.
- The UCPG has recommended a minimum inclusionary rate of 15-20%.

- The UCPG supports a requirement that inclusionary affordable housing be built on-site; no in-lieu fees.
- The UCPG supports more – not fewer - affordable housing options.
- The UCPG supports the concept of empirical analysis to evaluate and design a UC Inclusionary Housing Requirement.

Affordable Homes Requirement in the D-UCP:

- The City of San Diego engaged Keyser-Marston Associates to undertake a feasibility analysis for a UC-specific Affordable Housing Requirement (Draft Affordable Housing Report, Mar 2024).
- The D-UCP includes an “Affordable Homes Requirement” (SDR J.1 p 197) designed in response to that analysis.
- **SDR J.1** includes 5 options for satisfying the city’s Inclusionary Affordable Housing Regulations. Four of the five options (SDR J.1 1a and 1b., 2a and 2 [sic]) require that inclusionary affordable housing for low (below 60% AMI), low-moderate (below 80% AMI) and high-moderate (below 120% of AMI) income people be built with new residential development **in the University Community** – either on-site or off-site within a Sustainable Development Area in UC. The fifth option (3) incentivizes construction of inclusionary affordable housing in UC by requiring a higher in-lieu fee to opt out.

Thank you for incorporating UCPG recommendations:

- 1) to support construction of new affordable housing in the University Community through a UC-specific affordable housing regulation (SDR J.1).
- 2) to conduct empirical analysis of feasible alternatives to support this regulation.
- 3) to incentivize construction of affordable housing at various income levels.
- 4) to incentivize construction of affordable housing on-site, or if off-site, then within the UC Plan Area.

The UCPG offers the following additional recommendations:

- **Please add specific language** from the proposed D-UCP Supplemental Development Regulations (SDR-J.1, p. 197, 1b.) to City of San Diego Municipal Code to ensure that SDR J.1 is implemented.

1.b. Offsite Option

Please add specific language in the "offsite" option section to San Diego Municipal Code Section 142.1305(a) because it differs from the citywide inclusionary housing offsite ("on different premises than the development") option(s).⁷

⁷ SDR-J1 **1.b. Offsite Option** requires, "The construction or rehabilitation of affordable units off-site within a Sustainable Development Area within the University Community." **This option is more narrowly defined than the citywide offsite option** (Inclusionary Affordable Housing Regulations - Section 143.1305 (a)(2) and (3)).

- Please clarify language in SDR J.1 options 2a. and 2b.

2. a. and b. In-Lieu Fee Alternatives

Please make clear in Sections 2.a. and 2.b. that the terms of the 5 or 10 percent affordable housing requirement added to paying the in-lieu fee should satisfy the relevant requirements in the city's Inclusionary Affordable Housing Regulations, Section 143.1304.

- Please add language to Chapter 2, "Vision and Land Use Framework" introducing regulation, SDR J.1, AND the other city affordable housing programs that can be used in the University Community to provide housing affordable to very low-, low-, and moderate-income households.

It is important to describe these programs in addition to the inclusionary housing program in light of the D-UC Plan's stated Goals, Priorities, and Guiding Principles and because these policies apply to the whole UC Plan area (not just the CPIOZ).

- Please adopt the recommendation of the UCPG to suspend application of the Complete Communities Housing Solutions Regulations for the University Community when the Final UC Plan is adopted.

The UCP proposes both land uses and Affordable Housing regulations that reflect the context-specific expertise of city and community members over a five-and-a-half-year period. The Final UCP will meet the goals that Complete Communities is designed to achieve, and it should be the controlling policy for the UC Plan Area.

- Please Add the following language to Chapter 2," Vision and Land Use Framework," pp 44-45, after the section on Prime Industrial Lands.

"Affordable Housing Policies

a. Affordable Housing Regulations - San Diego Municipal Code, Chapter 14, Article 3, Division 7 provides "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. Additionally, the purpose is to specify how compliance with CA Government Code Section 65915 (State Density Bonus Law) will be implemented...." In exchange for providing affordable housing, developers receive a density bonus allowing them to build more units. The bonus depends on the percentage of affordable units provided.

b. Inclusionary Affordable Housing Regulations - San Diego Municipal Code, Chapter 14, Article 2, Division 13 "encourage[s] diverse and balanced neighborhoods with housing available for households of all

income levels. The intent is to ensure that when developing the limited supply of developable land, housing opportunities for persons of all income levels are provided." Modifications of the citywide Inclusionary Housing program are included in CPIOZ A of the University Community Plan and can be found in the Community Plan Implementation Overlay Zone section of the Implementation chapter: J. Affordable Housing - Supplemental Development Regulations (SDR-J.1).

- **Please consider linking to the Municipal Code** and/or additional information. SDA and Floor Area Ratio (FAR) maps associated with these programs should be referenced in the Final UC Plan.

- **Please include a combined map in the Final- UCP to show where Affordable Housing policies will apply** (show SDAs, Complete Communities (with the FAR) and CPIOZ SDR-J.1.

2. Displacement

- - UCPG is equally concerned with displacement of existing moderate/affordable rental housing.
- - Discussion Draft and Staff Preferred Land Use Scenario threaten future affordability and diversity of housing in UC by targeting the most affordable rental housing in UC for redevelopment and displacement of the most vulnerable residents.
- - Specific area of concern: rental complexes at SW corner of Nobel Drive/Genesee Ave (and west along Nobel Dr to Regents Rd). Minimize displacement, maximize affordable construction, and protect adjacent MHPA-open space.
- - Recommendation that Keyser Marston be asked to analyze anti-displacement regulations scaled to the rent/income levels in University Community.
- - Support for Community Planning Group Subcommittee Input Scenario, 143 du/ac (see alt p. 31) - including lower du/ac at SW corner Nobel/Genesee.

Recommendations:

- **Analyze and consider potential for anti-displacement regulations** scaled to rent/income levels in University Community (e.g., 1:1 replacement of moderate rate rental units removed through redevelopment).
- **Modify policy 1.4 2 D.** Apply requirement for on-site inclusionary housing in **Policies**.
"Require affordable housing to be built on site and make units available to meet the needs of families, local employees, and students.
- **Modify policy 2.19C.** Apply requirement for on-site inclusionary housing in **Policies**.
-Mixed-use developments shall include affordable and inclusive housing options.

- **Add policy 1.1 J.** Apply requirement for on-site inclusionary housing in Policies.
 - **Mixed-use developments shall include** affordable and inclusive housing options.
- **Correct/clarify SDR J.1 (p 197)**, subsections 1-3.
Numbering/organization is confusing.
Sections are numbered 2a, 2 and 3.
- **Please include in the Final UC Plan a clear explanation of the range of city and state programs that may affect the development of affordable housing in the UC Plan Area.** Consider including this explanation on **pages 44-45** where other interacting/guiding policies are discussed.
- **Please add language in the Final UC Plan** to explain how the UC-specific Affordable Homes Requirement outlined in SDR J.1 will interact with relevant city/state programs including state Density Bonus Program and Complete Communities Housing Solutions.

Alternative views on UCPU Subcommittee: Different inclusionary housing standard in UC versus city as a whole may raise legal concerns. On displacement, it is unfair to single out/penalize a property owner that has provided low to moderate income housing in the past by restricting future redevelopment potential. Support uniform zoning among neighboring property owners.

Alternative views on UCPU Subcommittee: Support higher densities (up to 290 du/ac) to maximize potential for new housing and jobs in the transit rich north UC area. Higher densities maximize transit/trolley investments, create opportunity for more walkable, mixed-use community, and support greater diversity and affordability of housing. Unlock potential for new homes for students and others who wish to live in the area. High rises can be more sustainable, more efficient, occupy less space, and can be architecturally more elegant if the heights vary. High density does not equal high cost.

VI. Mobility

UCPG Recommendations:

A. Redesign of Thoroughfares (including Governor Drive, Genesee Avenue, Nobel Drive, and La Jolla Village Drive in Nobel/Campus area - entrance to UCSD Campus).

- The city should complete a new and independent traffic study to determine feasibility before any changes to Governor Drive or other major thoroughfares are formalized in the Revised UC Plan.

- Conditions of the study: that it includes new traffic data (not only the 2015 study referenced in the D-UCP and D-EIR); that it studies the current mobility configurations in the Draft UCP; that the assessment takes place when schools in the University Community are in session, including during pick up/drop off times. The study should assume that new housing will have parking spaces (and cars), and not assume that new developments will not have parking.
- Traffic study with similar conditions should also be conducted before adoption of changes proposed for Genesee Ave, Governor Drive, Nobel Dr, and UCSD entrance in Nobel Campus area.
- Plan to reassess traffic conditions with regularity.
- Final UC Plan should 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). A Maintenance Assessment District would be one example of financing for the support of various mobility solutions.

B. Bicycle infrastructure:

- The UCPG supports protected bike lanes along major streets throughout the Plan area with the expectation that these will be continuous. Discontinuous bicycle infrastructure is not safe and will not meet goals for increasing bicycle use and shifting transportation mode share.
- The Plan should include clear plans for how bicycle infrastructure in the mobility plan will be implemented.
- The UCPG recommends that the city include a policy to preserve setbacks in private developments sufficient to allow construction of future bike infrastructure.
- The UCPG recommends that because of expected costs and budget limitations, the Plan should identify and *prioritize* bike infrastructure in critical streets/segments so that the ones needed most are built first (or built at all). The Plan should include a path to bike/pedestrian infrastructure most likely to be built and most likely to work.
- Final UCP should provide a clear plan for financing and implementation to assure that proposed infrastructure can be paid for and implemented as a whole (not piecemeal).
- **Please Correct Table 4:** Planned Bicycle Classifications Modifications, p 203 **for consistency with Policy 3.3D**, p 173

Policy 3.3D identifies Arriba, Cargill and Decoro Streets as bike boulevards. They are not mentioned in Table 4.

- Thank you for responding to UCPG recommendation to consider a future pedestrian and bicycle connection via *"Tower Rd. if security needs decrease in the future."*(p 78)

The UCPG recommends the addition of "no turn on red", "no left turn yield on green", and four-way crossings for pedestrians, to the installation of Leading Pedestrian Interval signs where appropriate in the University Community.

The UCPG recommends that all Class 3 bike lanes should become Class 2 buffered bike lanes, that all Class 2 bike lanes be buffered, and that all Class 4 bike lanes have physical protection, not just visual separation (i.e., flex posts). Protection can include curbs, parked cars between moving cars and bikes, or other protection such as bollards and planters that will prevent a crash.

Making these safety improvements will not only allow for existing cyclists, wheelchair users, pedestrians, and other vulnerable road users to be injured or killed less frequently, but also will incentivize people to walk and bike more, which is key to climate goals, and will reduce car traffic.

C. New At-grade Connection: Genesee Ave to Campus Point Court

- The UCPG supports new at-grade connection between Campus Point Court and Genesee Ave. The property owner has endorsed this proposal and expressed a willingness to pay for it.

This concept appears in Urban Design for Campus Point/Towne Centre Area.

- Please incorporate the UCPG recommendations for a new at grade crossing in **Mobility section** as well.

- **Add a new policy in Table 6, Section 3, p 176-77**, to reflect this priority. Include recommendation to work with property owners.

D. New Bike Connection between John J Hopkins Dr. and Science Park Road.

- The UCPG supports a new bicycle connection between John J. Hopkins Dr and Science Park Rd along the line of Cray Court or the new Spectrum Bridge. This route is parallel to but safer than Torrey Pines Road.

- This concept appears in Urban Design for North Torrey Pines Area. It should be included in Mobility section as well.

Please incorporate the UCPG recommendations to

- **Add a new policy in Table 6, Section 3, p 176-77**, to reflect this priority. Include recommendation to work with property owners.

E. New Bike Connection: Connect Coastal Rail Trail/I-5 Bike Path with Carmel Valley Bike Path

- Please incorporate the UCPG recommendations to identify the Coastal Rail Trail connecting to bike infrastructure immediately north of the University Community:

- The UCPG recommends that the city complete the connection between I-5 bicycle path (Coastal Rail Trail) and the SR-56 bike path via old Sorrento Valley Road to increase bicycle ridership to and from UC from Carmel Valley and north. These northern communities are a primary source of commuters to UC.
- Although this connection would be completed just outside the UC Plan Area, it affects mobility in the UC Plan, and we encourage the city to include this priority in the UC Plan and adjoining community plans.

F. Pedestrian Bridges

- UCPG and Subcommittee members have expressed support for additional pedestrian bridges to separate auto/non-auto traffic at major thoroughfares in the community.
- The city can address this concern by studying the potential for additional pedestrian bridges at Nobel Drive (west of I-5); Genesee Ave (at Governor Drive).

VII. UCPG Recommendations: Parks and Recreation

The UCPG is deeply concerned with the very large recreational value or “parks points” deficit.

Based on staff corrections to the D-UCP reported to UCPG, (April 9, 2024), the deficit 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, which represents park facilities for ~56,000 people. (Table 7, p 213).

The UCPG is equally concerned with the proposed deficit in Recreation Centers and Aquatic Centers.

The D-UCP estimates a shortfall of ~2.2 recreation centers and 0.59 aquatic centers at build out (based on staff report to UCPG, 4-9-24).

In reality, the deficit in Recreation and Aquatic facilities is larger than reported:

- The new Aquatic Complex at Standley Park is a **joint use facility** that is not accessible to the public during school hours for most of the year.
- The Recreation and Aquatic Center at the **proposed “Torrey Pines Neighborhood Park,” while welcome, is contingent upon non-renewal of a current lease, which is not up for renewal until 2043.**
- Thus, the D-UCP offers no potential for improvement in the Recreation and Aquatic Center deficit for at least two decades into the life of the new community plan.

In sum, the D-UCP does not meet the Parks Master Plan guidelines for recreational values, and it does not meet its own 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-UCP, p121)

The **Final UC Plan must address and reduce these deficits** and plan for the Park and Recreation infrastructure necessary to serve a growing population and required by city policy (*Parks Master Plan, 2021*).

The Revised Draft should show plans for achieving the *Parks Master Plan* standard for University Community.

The **Final University Community** Plan needs a better balance between new growth and supporting Parks and Recreation infrastructure.

The projected parks deficit is a red flag that the Draft-UCP land use scenario is overbuilt.

The Community Planning Group Input Land Use Scenario (Discussion Draft, Appendix) does a better job of meeting these goals.

UCPG Recommendations:

A. Account for Recreational Value Fully and Transparently.

Thank you for responding to the recommendations of the UCPG to review and rescore recreational values in the University Community.

The resulting Draft-UCP offers a more reliable basis for evaluating Parks and Recreation planning than the Discussion Draft.

Nonetheless, the D-UCP still includes several instances of potentially missing or miscounted points, including existing city park facilities, and joint use parks. (e.g., Torrey Pines City Park, and Weiss Park – Lawrence Family Jewish Community Center).

Regrettably, the total of new recreational points proposed in the D-UCP is LESS THAN the points planned in the Discussion Draft. The D-UCP projects 5,229 additional points (compared to 6,052 points in the Discussion Draft), a reduction of ~856 points (or parks for 8,500 people).

The D-UCP eliminates a category of Recreational Value points projected for residential and mixed-use developments on sites under 2 acres. In the Discussion Draft ~300 points were expected from such developments (see Disc Draft, Table 5, p 136 and D-UCP, Table 7, p 212).

In addition, **the D-UCP’s cumulative total for “Total Recreation Value Points Community-Wide” does not appear to be accurate.** The total reported at the end of Table 7 on p 213 (5,229.375) is not consistent with the sum of “Proposed Recreational Park Values” (5,196.125) reported for planned facilities listed in Table 7, lines 6-36, pp. 206-213. ⁸

Recommendations:

Please incorporate UCPG recommendations:

- **p. 213.** Check and Correct “Total Recreational Value Points Community Wide,” (Table 7 on p 213) to ensure that the tally matches the sum of points listed for individual facilities in “Proposed Recreational Park Values” (p. 206-213).
- **Incorporate UCPG recommendations for Specific Park and Recreation Facilities** listed in **Section H** below.
- **Make recreational value scoring sheets for specific parks publicly available** so that community members can check that work and contribute.
- Correct population figures on p 133: **“Existing and Projected Recreational Value Points.”** Ensure consistency btw p 46 and 133.

*“The University Community could attain a projected population estimated at ~~444,212~~ **129,566** people. The community should have access to enjoyable parks, recreational centers, and aquatic complexes as...” (133)*

⁸ The sum of “Proposed Recreational Park Values” for listed facilities in lines 6 through 36 of Table 7 is 5,196.125, compared to the reported “Total Recreation Value Points Community-Wide” of 5,229.375. The breakdown of park values for new park and recreational facilities (lines #6-35) is 1,845.125. Adding 3,351 for CPIOZ urban public spaces in residential/mixed use developments (line #36) = 5,196.125.

B. Include plans for Recreation and Aquatic Centers to meet PMP standards.
See Table 7, p. 206, and Policies 4.1 F, p 176.

Specific Recommendations:

Add to ~~Table 5, p 129~~, Table 7, p. 206, *Recreation and Aquatic Center at JCC-Mandel Weiss-Eastgate Park.*

Modify Policy 4.1 F, p. ~~180~~ 176. “Preserve, expand and enhance existing recreation centers and aquatic facilities to increase their life span. *Meet Park Master Plan guidelines for recreation and aquatic facilities to serve the University Community.*”

Add Policy 4.1 F1, p ~~180~~ 176. *Assure public access to recreation and aquatic center facilities of the Lawrence Family JCC in Weiss Eastgate Park.*

Add Policy 4.1 F2, p 176. *Meet Park Master Plan guidelines for recreation and aquatic facilities to serve the University Community.*

C. Clarify and Strengthen Policies for Urban Public Spaces.

Thank you for responding to the recommendations of the UCPG to consolidate and clarify guidelines for Urban Public Spaces.

Additional revisions will help to clarify and complete this progress.

Outstanding issues:

a) Unfortunately, the new SDR’s eliminate explicit requirements for urban public spaces in Residential and Mixed-Use Developments. This is a change from the Discussion Draft that should be reversed.

- Please restore a statement about requirements for Public Spaces and Recreational Values in Residential and Mixed-Use Developments. This statement should be added here in SDRs (or at minimum somewhere else in the plan, with a reference included in this section).

- The Final Plan should include policy/SDR to implement the statement that “*new parks and park amenities will be required of new developments*” (p 129)

b) The order and organization of SDR’s A.1-5 (p 187-93) prioritize secondary information while burying the primary instructions about the required size of public spaces

c) Cost and value of “Amenities” listed in Table 2, “Public Space Amenity Types,” p 188 are not equivalent. This may incentivize the over-provision of low cost and low-value amenities.

Specific Recommendations:

- The D-UCP should clearly and explicitly state the requirements for Recreational Value in public spaces provided for Residential and Mixed-Use developments.
- Please restore SDR 1.K (Discussion Draft, p 191) to new section SDR A.1 clarifying how Residential and Mixed-Use Developments will satisfy the requirement for public spaces and recreational values.

Add/Restore: SDR A.1.x *Recreation Value Points. All new residential or residential mixed-use development shall satisfy Recreation Value Points as part of the development of the urban public space that meet the standards identified in the Parks Master Plan.* (SDR 1.K, Discussion Draft, p 191)

- **Please revise the order and logic of the content of SDRs A.1, “Required Public Spaces,” and SDR-A.2, “Required Public Spaces Regulations.”**

- SDR A.1 should first identify the urban public space requirement.
- SDR A.2 should follow with guidelines for the amenities that may be required in the spaces provided by developments of different sizes.

Currently this order and logic is reversed.

- In addition, new SDR A.1 should begin with the public space requirements for developments of different sizes. Currently this info is buried in SDR A.2, section 3:

3 Size. A minimum of 5 percent of the premises or 5 percent of the gross floor area of the development, whichever is greater, shall be provided as public space. The maximum amount of public space required shall not exceed more than 15 percent of the premises.”
(p.192)

Steps to resolve:

- Please renumber SDR A.2 as SDR A.1 and move it to the beginning of the SDR’s
- Please renumber current SDR A.2, section 3, as SDR A.1, section 1.

- Please renumber current SDR A.1 as SDR A.2 and move it to second position in the list of SDRs.

-Please ensure that “Amenities” listed in Table 2, p 188 are roughly equivalent in cost and value.

- Delete “free library stands” from list of “Placemaking” elements in Table 2, Public Space Amenity Types.

“Placemaking Elements 3,4 A minimum of two (2) placemaking elements such as ~~free library stands~~, decorative lighting, interactive art, interactive playscape, climbing walls, elements of historical or cultural relevance, community activation elements/games, gathering areas, multifunctional “centerpiece” furniture, or similar.”

- Justification: Selected amenities should be relatively equal in cost and impact to assure the greatest value and variation in future urban public spaces. The public space requirement should not incentivize and oversupply of very inexpensive “amenities” such as “free library stands” in exchange for more expensive and more substantial features offered in Table 2.

Alternative Views on the UCPU Subcommittee: The CPIOZ and SDR requirements for urban public spaces are too detailed and rigid and don’t belong in a planning document. E.g., for one specific large life sciences campus, these could require as much as 8.5 acres of public space at private expense in the middle of an R&D campus. Many firms try to accommodate public access, but this is not feasible everywhere. Some restrictions are necessary – e.g., after hours and to meet tenant requirements for privacy and security. Recommend better balance between reasonable public access with needs of life science and R&D tenants.

Thank you for incorporating the concerns of property owners and balancing them with the needs of public access.

Point of clarification: the Discussion Draft provided for a maximum of 100,000 sf (2.3 acres) of urban public spaces for all new developments. It did not specify where in a project those requirements must be met.

D. Neighborhood Scale Parks

Thank you for incorporating the recommendation of the UCPG for new Neighborhood and “Neighborhood-Scale” Parks.

The UCPG recommends that the Revised Plan include plans for new **“Neighborhood-Scale” Parks** to serve the needs of new and existing residents – not just mini parks and “5Ps”.

Thank you for the creative proposal for a Torrey Pines Neighborhood Park (pps 125, 208).

The site has potential, including for co-existence of park and hospital uses as well as incorporation of adjoining space in Torrey Pines City Park.

Unfortunately, the proposal is *contingent* on non-renewal of a lease that runs until 2043 for a valuable community amenity (hospital). This proposal cannot address the dearth of Recreational Values or Neighborhood and Neighborhood Scale Parks until at least two decades into the life of the plan.

More effort is needed in this category.

SDR A.1-5 supporting Urban Public Spaces for commercial developments is a creative approach, which the UCPG supports; however, “parks” of 1,250-3,000 sf (see pages 189-191 of the Draft-UCP) will not meet the future recreation needs of a UC community twice its current size. The Final UC Plan must undertake the more challenging effort to ensure that Neighborhood-Scale Park Facilities are in our plan.

Recommendation:

- **Include plans to create new Neighborhood Parks** (PMP >3 ac). Parks “large enough to kick a ball, throw a frisbee, and let a three-year-old run to her heart’s content.”
- **Include plans to create new “Neighborhood-Scale” Parks (1-3 ac).** Parks large enough for unstructured play, picnics, games, etc.
- Consider and include a strategy for ***scaling Urban Public Space requirements to the size of development*** to ensure that Neighborhood Parks and Neighborhood-Scale Parks are built *in the places* where growth is occurring.
- **Consider new SDR A.2 F (p.192)** to include guidelines for residential/mixed use development of greater than X acres to provide Neighborhood-Scale Park facilities **(1-3 ac)** scaled to the size of the parcel.

E. Land Acquisition

The UC Plan should explain clearly how it will **meet the Parks Master Plan for land acquisition and land area.**

Note:-The *PMP*, Appendix D, p. 19 states that “At least 20% (or 20 points per 1,000 residents) of a community’s park standard shall be satisfied through increased land acquisition.” The *PMP* indicates that this score as part of total recreational value will be “calculated and used during the community plan update process.” (*PMP*, Appendix D, p 19).

The operative word is “**shall**.”

However, the *PMP* is unclear about how this policy will be fulfilled. The Discussion Draft includes no discussion of how this mandate will be achieved.

As the **largest** plan update to approach completion since approval of the *PMP*, the **Final UC Plan** should lay out very clearly how the city will meet this mandate. This is an answer the city must have, and the UC Plan is the place to apply it.

Specific Recommendations:

- p. 206-13, Table 7 Existing and Planned Parks and Recreation Facilities Inventory – Include Land Area for future parks

The UC Plan should explain clearly how this standard will be applied to UC (and to community plan updates in general).

- p. 212-13, Table 7 Existing and Planned Parks and Recreation Facilities Inventory Should clearly state how many acres of land acquisition will be required to meet the city's points standard (and where these are planned).

- Note: fast math suggests as much as **296 additional new acres** of park space will be required to meet the *PMP* mandate (**based on corrected population announced 4-9-24**):⁹

- The **Final UC Plan** should include this information and show clearly how the Plan and its proposed policies/SDR's will meet (or not meet) this standard. (Table 7, pp. **206-213**)

F. Funding and Implementation Mechanism for Parks

The UCPG appreciates the creative effort to design *SDRA1-5* (p 187-93) for Urban Public Spaces; however, as noted, even with this effort, the Draft does not come close to meeting the required recreational values mandated by the *Parks Master Plan*. It cannot meet the land acquisition mandate. It cannot meet the requirement for Recreation Centers **or Aquatic Facilities**.

The UCPG recommends that the city develop additional strategies to build and finance future park and recreation infrastructure.

Specific Recommendations:

- Consider a **supplemental funding mechanism** such as Supplemental Development Impact fees ("Future Opportunities Fund") for Parks in UC (see section X below).
- Consider a **revised or expanded SDR-4 A.F and G** to scale park facilities to the size of development with the goal of providing **Neighborhood (>3 ac)** and Neighborhood-Scale Park (**1-3ac**) facilities in developments of sufficient size (see above).

⁹ The PMP would require ~ 370 total acres of park land in the UC Plan Area at build out (that is, 12,956 points needed x 20% of rec value points at ~7 points per acre). Subtracting the current 74.6 acres of community park (UC Community Atlas, 58) equals approximately **296 additional acres** to meet the PMP standard.

- Consider **other means to finance and support park development** to meet *PMP* standards.

G. Prioritize preserving unstructured, open green areas in current and future parks.

The UCPG recognizes many comments and concerns over the need for unstructured open green areas and play fields in our local parks.

- The UCPG recommends that the Plan **prioritize unstructured, open green areas and play fields** in current and future parks.

H. Specific Park Recommendations: RE Table 5: Park Inventory

- pp. 206-210: Community Parks, Pocket Parks, Trailheads and Plazas

Column 4: Rows 6-24:

- **Replace “Recommendations”** for proposed parks in lines 6-32. Clarify that future park design will coordinate with the community. Note, many items have been on the unfunded list for years.

Substitute the following process statement for current lists of amenities:

~~“Work with the community to~~ **In coordination with UC Parks and Recreation Council, determine items needed and desired to be added to the park. Include on that list for consideration items on the city’s Parks Unfunded Improvements list.”**

- p. 212 - #34- Torrey Pines City Park

- **Update Project Description** – Many current facilities appear to be missing - include existing facilities – overlooks, trails, beach, picnic tables, cafe, deck, etc.
- **Fully score existing park facilities** to ensure that recreational value tallies are accurate for current and existing points

- Thank you for incorporating UCPG recommendation to include direction to implement the Torrey Pines City Park GDP.

- Thank you for responding to UCPG recommendation to review and confirm status of community Shorelines:

- Please Add and Score - Old Route 101 Trail

3,800 LF of paved, publicly accessible walking/cycling path on City of San Diego land. The pathway runs from Torrey Pines Lodge/Callan Rd to South Fork Trailhead, Torrey Pines State Reserve on the west side of North Torrey Pines Road

- p. 208 - #13 Mandell Weiss Eastgate Neighborhood Park:

Thank you for responding to recommendations of the UCPG to confirm and clarify the status of public park facilities at Weiss/Eastgate Park and Lawrence Family JCC:

Unfortunately, the finding is that these recreational facilities on city land designated as Weiss-Eastgate Park do not meet PMP standards for public access.

- Clarify the intention that Weiss Park/JCC facilities are public¹⁰

Like the lease related to the proposed Torrey Pines Neighborhood Park, this lease will expire before the term of the Community Plan.

The Final UC Plan should include plans that include public access to these recreational facilities in a city park.

Specific Recommendations:

Please Incorporate recommendations listed in Part B (above) – Recreation and Aquatic Centers:

Add to Table 7, p. 206, Recreation and Aquatic Center at JCC-Mandell Weiss-Eastgate Park.

Modify Policy 4.1 F, p. 176. “Preserve, expand and enhance existing recreation centers and aquatic facilities to increase their life span.

Add Policy 4.1 F1, p 176. Assure public access to recreation and aquatic center facilities of the Lawrence Family JCC in Weiss Eastgate Park.

Add Policy 4.1 F2, p 176. Meet Park Master Plan guidelines for recreation and aquatic facilities to serve the University Community.

- p.208, line 13

Confirm and Re-Score Mandell Weiss Park

(“Existing Park Value”) **including JCC facilities.**

Facilities listed in website include recreation center, fitness gym, tennis center and courts, theater, and aquatic center.

Table 7, line 13, column 4, includes outdoor amphitheater. JCC website lists: “an outdoor amphitheater”

¹⁰ The 1981 lease between the city and JCC includes the expectation that the property “*shall be developed, operated, and maintained* as a public community center for park, recreational, cultural, and educational activities for the benefit of the citizens of San Diego.” (Source: https://docs.sandiego.gov/council_reso_ordinance/rao1981/R-254702.pdf). The 1987 UC Plan includes Eastgate Park among population-based parks, “as a privately operated park and community recreation center open to the general public” 229.

Thank you for incorporating UCPG recommendation to modify Project Description, to read “The park includes the facilities of the Lawrence Family Jewish Community Center”:

- p 208, Change the acreage to 10.49 acres in column “Existing Size”

- **Limit hardscape and development in open areas of Weiss Park.** The open outdoor area of Weiss Park is very well used. It is crowded with limited Space for play fields.

- **Universal change - Replace column 4 recommendation:**

“Work with the JCC and the Community to determine needs and priorities.”

- Consider adding the **recommendation to explore potential for expanding Weiss Park in the future** through purchase or agreement with adjoining property owners. Note: utility property at NE corner of Regents Rd/Executive Dr. may not be needed for present purposes in the future. It would represent an opportunity for the city to expand park space in a critical location.

- p. 208 – Future Neighborhood Park Opportunities

- **Town Park Villas Golf Course:**

Consider potential for future **Neighborhood Park** at former golf course through acquisition or joint use agreement. Vet with community.

- **La Jolla Village Square/Nobel Campus Area in general:**

Consider recommendation for a Neighborhood Scale Park at/in vicinity of La Jolla Village Square.

- p. 208, #15-16 – Linear Parks at Regents Road North/South

- The UCPG, UCPU Subcommittee and community strongly support these Linear Parks.

The UCPG has the following recommendations to meet its expectations for these important community spaces.

Unfortunately, support for these Parks appears to have eroded in the D-UCP. Expanding use of the term “greenways” to describe Linear Parks suggests a retreat of city support for this community goal.

Recommendations:

Please incorporate the recommendations of the UCPG:

- **Add policy language** that they will be developed **as Parks** and **managed** as such by the Park and Recreation Department.

- **Confirm transfer and management by Parks and Recreation Department** (not Transportation and Storm Water).

Thank you for incorporating UCPG recommendation to Correct Photos on p. 122-24

Please incorporate UCPG recommendation to identify these facilities as Linear Parks.

- **Modify language, p. 126:**

Please use “Linear Parks” (versus “greenway”) to clarify the city’s intention that these will be **PARKS**, planned, managed and maintained by Parks and Recreation Dept, and **not STREETS** managed and maintained by TSW.

“These three ~~green-way~~ **Linear Park** projects could provide fitness circuit nature exploration playgrounds, educational signage, pedestrian and bike paths for families and children as well as providing scenic overlooks into the canyon while maintaining and improving existing trails, **habitat conservation** and maintenance access. They also provide an excellent opportunity to educate the public on the native plants and animals that need the canyon to thrive and survive.” (p 126)

Note: If there is anything the community or UCPG need to do to ensure that the Linear Parks will be managed *as parks* by Parks and Recreation Dept, please let us know now.

Thank you for maintaining the incorporating UCPG recommendation to utilize unused rights of way for linear parks and other public spaces.

- **Modify Policy 3.1 H (p 173) for clarity:**

“Pursue opportunities for the conversion of underutilized right-of-way (e.g., areas adjacent to roadways, and paper streets) into exclusive pedestrian ways, multi-use paths, linear parks, or other public spaces that encourage outdoor activity and expand urban greening ~~space~~. Areas of particular interest within the University Community include Governor Drive terminus west of Stresemann Street, Regents Road terminus south of Porte de Merano, and the ~~vacant space west of~~ **unused right of way of** Regents Road between Governor Drive and the Rose Canyon Trailhead.”

- **Modify Policy 4.1 G (p 176) to include street as well as alley ROWs.**

“Increase recreational opportunities by acquiring and developing land through road/parking “diets” and **street and** alley rights-of-way vacations, where appropriate, to provide for park and recreation uses.” (p 176)

Thank you for incorporating UCPG recommendation to delete erroneous reference to linear park on Campus Point Drive.

- p. 210, #19 Eastgate Mini-Park 2,

- **Include potential to expand Eastgate Mini Park 2** on Towne Center Drive. Please implement concept presented to Subcommittee, May 17, 2022, including potential vernal pool restoration, elevated walkway, public access, and outdoor education space at Mini-Park 2.

- **Explore potential joint use agreement** with adjoining owner of this former building pad, which contains a natural vernal pool and tremendous potential for restoration, education, and stewardship.

- **Correct Project Description for accuracy, Table 7, p 210**

There are no picnic tables. The “multi-use pathways” are disconnected sidewalk. Concrete edging serves as “seating.”



(Source: Planning Department Presentation, CPUS Meeting, May 17, 2022)

- p. 210: # 20: Governor Drive Linear Park

- Revise language -
 - Identify as a “Linear Park”
 - **Delete “Greenway”**
 - Clarify, location
- Confirm transfer and management by Parks and Recreation Dept.

- **Update description:**

Governor Drive ~~Greenway~~ Linear Park

“Existing rights-of-way at the west end of Governor Drive south of the Rose Canyon is planned to be converted into a pocket-linear park under management by Parks and Recreation Department between Stresemann Street and at the entrance to the Coastal Sage Habitat Interpretive trail.

- p 210: #21: - Delete Eastgate Drive Pocket Park.

- UCPG recommends deleting this proposal for a joint use park. The area is maintained privately as a small park. City should not take on maintenance and costs of this space.

- The location is inside the Airport Noise Exposure 65 decibel zone. Passive recreation is NOT a permitted use in the 65+ decibel zone.ⁱ

- p 210:

- Please restore potential Gullstrand St. Trailhead Pocket Park.

- There is strong community support for acquiring this 14-acre parcel **as open space park**. Multiple community group votes have supported this position. The UCPG voted 16-0 in July 2020, to recommend protection of this parcel as *open space*. (see UCPG Minutes, July 2020).

Clarify that the 14 acres would remain an **open space park** with a new trailhead, pocket park at Gullstrand Street.

-Specify potential for acquisition through purchase or land swap – which Public Utilities Department may have greater interest in and the city may be better able to afford.

Modify Include project description: restored row #22, column 4.

“Recommend acquiring 14 acres of ~~vacant~~ open space north of University Gardens Neighborhood Park from the Public Utilities Department (through purchase, land exchange or other means) for use as open space park. Design, and construct a pocket park consisting of a trailhead, trail, public art, educational/cultural elements, and seating.”

- p 210, #22 Torreyana Pocket Park. Please locate this proposed pocket park in Figure 26, p 125.

- p 210, #23 Campus Point Drive Pocket Park.

- Please locate this proposed pocket park in Figure 26, p 125.

- Update Project Description. Note that this proposed park is on private property, like #21-22

- Update Recommendations:

"Design and construct a park with facilities consisting of public art, educational/cultural elements, seating, a scenic view overlook area, *native plant restoration*, and shade trees.

- p 210, #24 Nobel Drive Pocket Park. Please locate this proposed pocket park in Figure 26, p 125.

- Update description. Note that this proposed park is on private property, like #21-22

- p. 210 #28 Montrose Park – UTC (aka “Torrey Trail”)

Thank you for incorporating the recommendation of the UCPG to review and clarify the status of this existing joint use facility.¹¹

- p. 210, #29. Joint Use – SDUSD – Mission Bay Montessori.

- **Delete recommendation for sports field lighting** as this property adjoins the MHPA and a steep, unlighted canyon visible from I-5, etc. Avoid light pollution and habitat impacts.

- Revise recommendation:

“Work with the community to determine items needed and desired to be added to the park. Include on that list for consideration items on the city’s Parks Unfunded Improvements list.”

- p. 434 210 Joint Use Opportunities – University City High School

Thank you for incorporating the recommendations of the UCPG to review and clarify the joint use status of facilities at UCHS.

The UCPG recommends that the City continue to:

- **Consider future Joint Use** opportunities at UCHS.

These facilities are routinely used. Informal use should be formalized to secure public access to facilities that have been in public use for many years.

p. 210 Consider Joint Use Opportunities – North UC: La Jolla Country Day School/Places of Worship?

¹¹ Westfield UTC is required to maintain this as a public park as a condition of the city’s 2008 approval of the UTC mall expansion. See 2008 MPDP for Westfield UTC, MPDP, p 3:12, 4:36, 4:81)

- **Consider possible joint use opportunities** in North UC where the majority of residential development is planned and the greatest need is/will be.

- **Explore potential for private/public partnerships** for joint use with LJ Country Day School and NUC religious institutions.

- **p. 212 #32 Rose Canyon Open Space Park**

- Update Recommendation to meet MSCP/MHPA Natural Resources **Management Planning** should precede recreational planning in MSCP/MHPA areas such as RCOSP. The city is 25 years behind in this legal obligation:

- **Revise recommendation:**

“Complete a Natural Resources Management Plan to inform future uses.”

- **Please Correct Typo:**

“Design and construct trails that *comply* with the MSCP consistency findings, Environmentally Sensitive Land regulations, and Natural Resource Management Plans.

- **Thank you for incorporating UCPG recommendation to delete proposed Voight Lane Overlook, which is on the UCSD campus.**

VIII. UCPG Recommendations: Sustainable Community – Guiding

Principle 6 (“A Sustainable Community Integrated with its Natural Environment, Open Space, and Recreational Areas,” p 13)

Recommendations for Urban Design, Urban Forestry and Urban Greening, Canyon Adjacent Development, MHPA Protection, Parks and Recreation, Open Space and Conservation, etc.

A. Thank you for incorporating many UCPG recommendations in support of Guiding Principle 6.

These include “stronger **language** and **policies** on the protection, enhancement, restoration and integration of nature, particularly native species, throughout the Community Plan area.” (UCPG, July 2023)

The D-UCP incorporates more “emphasis on **nature, habitat, biodiversity, native landscaping and native wildlife** not just for MHPA areas, but also for community parks, mini parks, developed areas, urban design, and urban greening, street tree selection, urban forestry, etc.” (UCPG, July 2023).

Nonetheless, there are many areas where the Final UC Plan can and should be strengthened to support Guiding Principle 6.

B. Dedication of Open Space

Thank you for your commitment to dedicating UCPG recommended city-owned open space parcels pursuant to Charter section 55.

This has been a long-standing and strongly held recommendation of the UCPG. The UCPG voted unanimously to support dedication of these parcels in July 2020 (see UCPG Minutes).

Thank you for accurately identifying these parcels in the Draft -UCP, Figure 29 (University Community Open Space), p 143.

Unfortunately, supporting documents in the D-EIR, Biological Resources Report (BRR) and Proposed Zoning Map do NOT accurately identify these parcels.

- Figures 4 and 5 of the Biological Resources Report omit a portion of one of the parcels (see below).
- The BRR and D-EIR mis-state the total acreage of the lands proposed for dedication. The D-EIR states that 160.9 acres are proposed for dedication.¹² The correct acreage is approximately 168.79 acres.¹³

It is critical that these documents are accurate and that the city owned lands proposed for dedication are consistently and correctly identified so that this proposal may be translated into an accurate policy/ordinance language for Council approval.

Specific Recommendations:

- **Please correct errors** to ensure consistency between the Draft UC Plan and the environmental documents that support it.
- **Please revise the D-EIR, the Biological Resources Report (Fig 4-5), and the Proposed Zoning Map** to ensure that city owned open space parcels to be dedicated pursuant to Charter section 55 are described accurately and consistently in every part of the Final University Community Plan.
- **Please revise the D-EIR, the Biological Resources Report (Fig 4-5), and the Proposed Zoning Map** to ensure that all of parcel K302 P3 (sub-parcels APN: 343-121-01 & 343-121-05) are included in the Final UCP and associated documents.

Figures provided for reference:

¹² See Biological Resources Report, p 8; D-EIR p 3-64.

¹³ Correct acreages are available for parcels K302 P2, K302 P3, L310 RU, L303 RU, L303 PM, via the City's City Owned Property tool:

<https://sandiego.maps.arcgis.com/apps/webappviewer/index.html?id=7cace2f50ec7459e84acaa98345c2806>

Figure 29: University Community Open Space, D-UCP, p 143



Figure 29 accurately represents the parcels proposed for dedication under Charter sect 55. The parcel misrepresented in the D-EIR and Biological Resources Report (K302 P3) is circled in red. K302 P3 includes two sub-parcels (APN: 343-121-01 & 343-121-05)

City of San Diego, Map of City Owned Property illustrates the full parcel (K302 P3).

Map of City Owned Property

<https://www.arcgis.com/apps/webappviewer/index.html?id=7cace2f50ec7459e84acaa98345c2806>

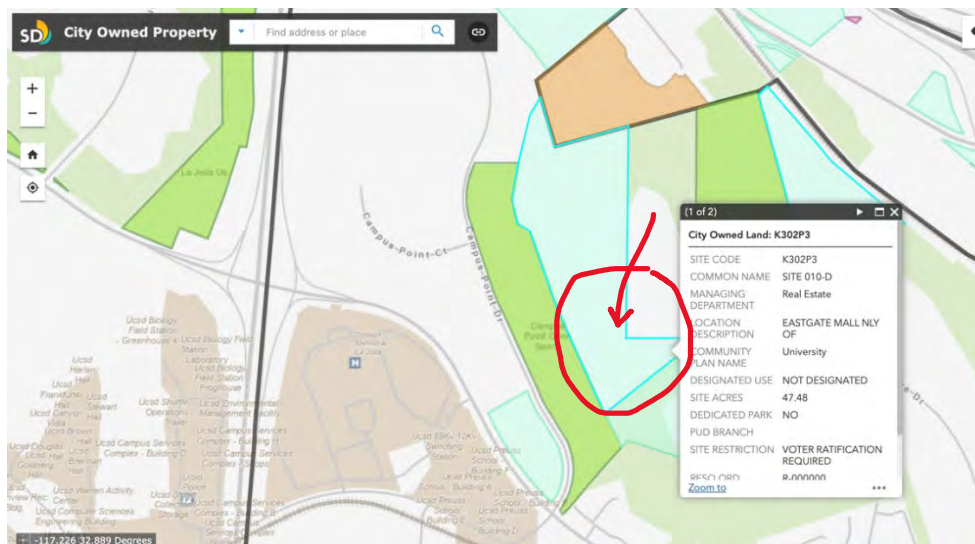


Figure 4. Post-Project MHPA and Conserved Lands, Biological Resources Report, D-UCP.

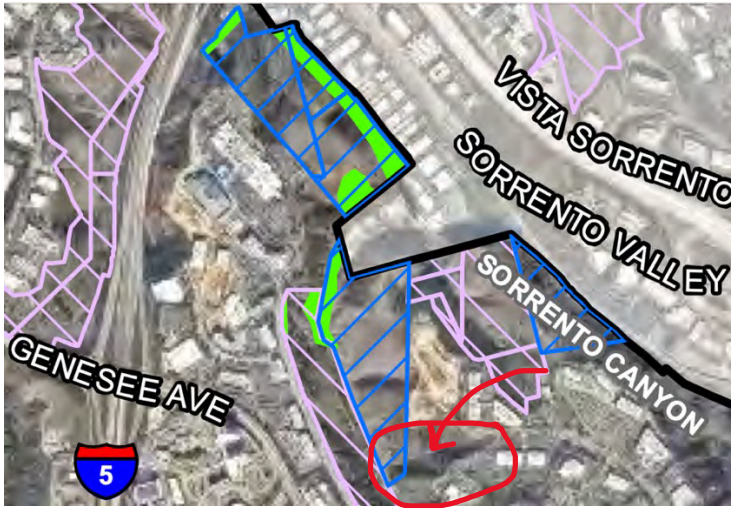


Figure 4 omits a portion of one parcel (K302 P3) proposed for dedication. The missing sub-parcel is APN: 343-121-05. It is approximately 5-acres in size.

Figure 5: "Open Space to be Dedicated Pursuant to Charter 55"



Figure 5, BRR, omits a portion of one of the four parcels (K302 P3). The missing sub-parcel is APN: 343-121-05. It is approximately 5-acres in size.

Additional Open Space Recommendations:

- Please modify language on “Other Open Space Areas,” p 140:

*“The land in Federal Government ownership within the community plan area ~~is~~ **contains highly sensitive habitat** ~~currently vacant, and~~ ~~Public access is not authorized on any parcels owned by the federal government. It is anticipated that....”~~*

C. Native Trees and Landscaping:

The plan should **prioritize landscaping all projects and all areas throughout the Plan with plants specifically native to San Diego.** This includes streets, paseos, parks, public and private project landscaping, and stormwater infrastructure.

Thank you for responding to UCPG recommendations by adding seven native trees as optional street tree selections.

This is a small step in the right direction.

The Final UCP should take the next steps to *prioritize* native trees in urban forestry, as well as to strengthen support for native landscaping in urban design, urban greening, parks and open space.

Specific Recommendations:

Thank you for responding to the UCPG recommendation to *prioritize* native landscaping by adding language to support “*incorporating native plants and landscaping*” in the Urban Design of the Torrey Pines and Campus Point/Towne Centre Drive areas (pp 78 and 82).

Please add specific Policies to make native landscaping a priority in these areas.

- **Prioritize native landscaping in the Torrey Pines and Campus Pt/Towne Centre Drive “Village” areas.**
- **Please support UCPG recommendation to add urban design policies for North Torrey Pines and Campus Point/Towne Centre areas.**

Add Policy 2.15 L. **“Prioritize native landscaping and design features sensitive to biodiversity.** p 170

Add Policy 2.16 K. **“Prioritize native landscaping and design features sensitive to biodiversity.** p 171

Add Policy 2.16 L. **“Encourage publicly accessible canyon overlooks to create a stronger sense of place and foster appreciation for the open space system.”** (p 171)

- Urban Greening: Prioritize native vegetation

Thank you for supporting UCPG recommendation to support use of native vegetation in Urban Greening, (pp 74-75).

Please incorporate UCPG recommendation to Add Policy 4.1 M.1. p. 178, to reinforce this discussion.

4.1 M.1. “Prioritize use of native vegetation in Green Streets”

Thank you for incorporating UCPG recommendation to “restore” native vegetation in open space areas.

Please incorporate UCPG recommendation to delete conditional phrase, “where possible.”¹⁴

- Please Modify Policy 4.2 D, p. 178

“Retain and restore native vegetation in open space areas.”

- Modify Policy 5.6 A. p 178

“Retain native vegetation where feasible and revegetated disturbed areas and open space with locally native, non-invasive, drought tolerant, and fire-resistive species to improve drainage conditions, reduce slope erosion and instability, protect water quality, and restore biological diversity. New development within or adjacent to the MHPA must comply with the MHPA Land Use Adjacency Guidelines.”

- Urban Forestry: Prioritize Native Trees

Thank you for responding to UCPG recommendation by adding 7 “Optional native trees” for use on a “project by project basis (p 73).

This is a very small step. The Final UCP should do more.

Prioritize native street trees in Tree Selection for the University Community (e.g. Coast Live Oaks, Western Sycamores, Torrey Pines, etc.) adjacent to open space (parkways), on streets connecting open space areas (corridors), and at specific community entries (gateways).

¹⁴ Recommendation supports the goal of “Open Space Canyons,” “to preserve and protect native plants and animals, while providing for compatible public access and enjoyment.” (D-UCP, p 124).

Native trees help to define the community and region. They create sense of place, enhance biodiversity, reduce water consumption, and integrate the benefits of natural systems within the urban landscape. For instance, the Torrey Pines that line much of North Torrey Pines Road create a unique sense of place that underlies the attractiveness and high real estate values of the life science core.

San Diego County recently passed a native landscaping ordinance (2022). UC is a regional leader in community and corporate emphasis on native landscaping. The UCPG has been a driving force behind this change. Native trees and landscaping are keys to a sustainable future. The Final UC Plan should lead.

Specific recommendations:

- p. 70, columns 1 and 2. – **Please** Incorporate justification for use of native trees
- p. 74, column 1, paragraph 1, **Please** insert language
“...urban greening allows for double the benefits when considering the community’s mobility network as an additional opportunity to expand open space and wildlife habitat **enhance biodiversity.**”¹⁵
- a. **Please incorporate recommendation of UCPG to identify specific street segments as locations for Native Trees and Shrubs.**

Figure 13: Street Tree Plan, p 63-67 and Table 3, Street Tree Matrix, (p 200-202):
Identify the following street segments as:

“**Native Tree Parkways**”: street segments adjacent to or between open space/canyon edges.

- **Regents Road**, north and south of Rose Canyon. Designate Linear Parks and road segments stretching from them north and south for native trees.
- **Governor Drive** from Linear Park to Regents Road
- **Gullstrand St** from Kantor Street to Florey Street/Rock Valley Ct
- **Gilman Drive**, I-5-UCSD
- **Nobel Drive**, Towne Centre Drive to Miramar Rd
- **Campus Point Drive**, Genesee to north end
- **Towne Centre Drive**, Eastgate Mall to north end (potentially south as well, see below)
-
- **Eastgate Mall**, Towne Centre Drive to Miramar Road
- **Judicial Drive**, Nobel Dr to Eastgate Mall
- **La Jolla Colony Drive**, I-5-Porte La Paz
- **Torrey Pines Road**, Genesee to TPSR. (Torrey Pines, please)

b. Identify the following street segments as Native Tree “Corridors” to enhance connectivity between open space areas, especially for birds

¹⁵ See Liu, “Are Street Trees Friendly to Biodiversity?” *Landscape and Urban Planning*, (Feb, 2022).

and insects

- **Regents Road, north and south of Rose Canyon.** Use native street trees (Coast Live Oaks), and landscaping in medians and parkway to connect Marian Bear Park to Rose Canyon, Doyle Park, UCSD, and Campus Point Open Space.
- **Gullstrand Street,** Kantor to Rock Valley Ct. Connect San Clemente Canyon with Rose Canyon via University Gardens Park and University Village Park.
- **Judicial Drive,** Nobel Dr to Eastgate Mall. Connect Rose Canyon with Roselle Canyon/Sorrento Valley.
- **Towne Centre Drive,** Nobel Dr to the north end. Connect Rose Canyon with Roselle Cyn/Sorrento Valley.
- **Gilman Drive,** I-5 to UCSD. Connect Rose Canyon with UCSD
- **Torrey Pines Road,** TPSR to Genesee Ave. Connect UCSD to TPSR
- **Torrey Pines Mesa area,** Prioritize native trees and landscaping for all streets and public ROW.

c. Identify the following street segments as: Native Tree Accent Gateways

- **Regents Road/Hwy 52,** (sycamores and coast live oaks)
- **Genesee Ave /Hwy 52,** (sycamores and coast live oaks)
- **Torrey Pines Road/Genesee –** (Torrey Pines)
- **Miramar Road/Eastgate Mall** (CLO, Toyon, Ceanothus, Rhus)

- p. 200-202, Table 4 3: Street Tree Matrix:

- Please add native trees as primary selections – not merely options:

The matrix includes just **ONE** native tree (Western Sycamore, *Platanus racemosa*).

- Add Coast Live Oak, Torrey Pine, Blue Elderberry, Fremont Cottonwood, and Arroyo Willow, other CA species. Consider Toyon, Lemonade Berry, and other trees. Consult California Native Plant Society for additional recommendations.

- Please add Torrey Pine to Table 3: Street Tree Matrix, “Existing Trees” for North Torrey Pines Road. It is currently a primary street tree on North Torrey Pines Road.

- Please remove invasive trees from **Table 3 - Street Tree Matrix:**

I.e., Remove Mexican Fan Palm (*Washingtonia robusta*) **on Eastgate Mall**

D. The UCPG supports stronger MHPA adjacency policies throughout the Plan.

The Draft-UCP projects a large amount of development near and adjacent to MHPA, including habitat for rare species and threatened species listed under the Endangered Species Act.

Recommendations:

Please incorporate UCPG recommendation to support consistent language referencing MHPA (its value, locations, guidelines protecting it, esp. where they may interact with stated policies).

- More consistently **Add language** acknowledging and requiring projects, including parks, to follow MHPA land use adjacency guidelines.

-Add policy to 4.2, p 181:

“Adjacent to MHPA and in the coastal zone, prioritize scenic overlooks and overlook parks over trails in order to provide access to nature balanced with protection of habitat and biodiversity.”

- Please incorporate UCPG recommendation to:

- Avoid new sports lighting in parks adjacent to MHPA/ MSCP lands...
(See parks recommendations, Section H below)

E. Protect Watersheds:

Thank you for incorporating UCPG recommendations to strengthen language recognizing and protecting watersheds:

The Plan needs language throughout to **recognize and protect the two three coastal watersheds** (Rose Creek, **Mission Bay, La Jolla**, and Los Peñasquitos watershed) **and three creeks** (Carroll Creek, Rose Creek, and San Clemente Creek) that drain from the UC Plan Area.

The Plan should recognize and apply the understanding that clean water in Mission Bay, Los Peñasquitos Lagoon, and Torrey Pines State Beach begins in University City.

Recommendations:

Thank you for incorporating UCPG recommendations to incorporate new language
- p. 75, column 2, paragraph 1

“Through landscape and street design strategies, stormwater facilities will help prevent flooding and urban runoff, **reduce erosion in canyons and riparian areas**, while enhancing water quality **in coastal watersheds, bays and beaches** (see Figure 13).”

Please Update/Correct language on watersheds, p 139:

*The University Community Planning Area **is wholly within the Penasquitos watershed management area**, and three tributaries of this watershed including Rose Creek, Carrol Creek, and San Clemente Creek convey **rainfall and stormwater runoff** through the University Community before ultimately draining into Mission Bay **and Los Peñasquitos Lagoon**. The community possesses a*

~~varied and largely undeveloped~~ topography, which provides the opportunity to develop an outstanding open space system.¹⁶

F. Riparian Protection and Restoration:

Please incorporate UCPG recommendation for stronger language supporting riparian protection:

- The Plan must include language throughout about **riparian protection and restoration**.

Recommendations:

- Add policy to specify **development setbacks from Riparian areas**. **Recommend a setback of 100,'** which appears mid-range in a variety of published California plans.

(See policy 4.2M below)

Thank you for incorporating UCPG recommendation to protect riparian areas by deleting Policy 5.13 J: It is infeasible and unnecessary.

F. Protect, Manage, Restore Wildlife Corridors

Thank you for incorporating UCPG recommendations to identify and support wildlife corridors in the University Community.

- The Plan should clearly **identify wildlife corridors** and include language about **protecting, managing, and restoring them**.

The University Community sits at the juncture of important MSCP-identified wildlife corridors that connect core habitat lands on MSCA-Miramar and Mission Trails Regional Park with coastal canyons – San Clemente/Rose – and the Los Peñasquitos watershed.

Recommendations:

Thank you for incorporating UCPG recommendation to strengthen Policies 4.2 L, p 178, and Policy 5.6 E, p 179 on protection and enhancement of wildlife corridors:

“Preserve identified wildlife corridors **and prevent habitat fragmentation** by requiring conformance with the MSCP guidelines such as **restricted development**, buffers, landscaping, and barriers. **Seek opportunities to enhance wildlife corridors through crossing structures, wildlife friendly fencing, land acquisition and other best practices.**”

¹⁶ For accuracy: UC is in the Peñasquitos Watershed *Management Area* (an administrative area), but it drains into three watersheds (natural hydrological areas) – Mission Bay, La Jolla, and Los Peñasquitos.

See <https://projectcleanwater.org/watersheds/mission-bay-la-jolla-wma/>

Add policy 5.13 F.1. p. 180

“Protect and enhance wildlife corridors to assure safe, functional wildlife connections between MCAS Miramar and Rose Canyon/Rose Creek Watershed and Sorrento Valley/Carroll Creek/Los Peñasquitos Watersheds.”

Correct Figure 29, p 143.

Move arrow depicting north-south wildlife corridor to the east side of I-805, including corridor through Soledad Canyon (route of the railroad).

G. Community Gardens:

Thank you for incorporating UCPG recommendation to include community gardens as an amenity option in urban public space requirements (see Table 2, SDR A.1, p. 188.

- The UCPG recommends the Plan include space in University City for **community gardens**.

H. Canyon Adjacent Development/Context-Sensitive Design Near Open Space

Add policies to address edge effects related to Canyon Adjacent Development, including lighting, bird strikes and bird safe glass, noise and other human impacts. Use native landscaping, protect sensitive habitat, address adjacency threats to MHPA/MSCP, and support biodiversity.

Clarify definition of “canyon” and “canyon edge.”

Balance public access to open space, where appropriate, with protection of sensitive natural resources.

The UCPG strongly supported this concept in the Discussion Draft as a bold step with potential to protect open space and to integrate canyon adjacent development safely and sustainably in the future.

The UCPG recommended specific revisions to clarify and strengthen this policy. These focused on the lack of consistency in the concept description and definition, lack of clarity regarding where and how it would apply, and concerns with mitigating edge effects on open space canyons, and meeting guidelines for environmentally sensitive lands and MHPA.

Thank you for incorporating several of these recommendations.

Unfortunately, the revised Draft-UCP remains inconsistent and unclear. Revisions have multiplied rather than resolving these problems.

- “Canyon edges” remain poorly and inconsistently defined.
- Different parts of the D-UCP suggest radically different limits and locations where the concept may apply.

- Changes to SDR C.2, in particular, restrict its application to approximately 2 properties and under 200 feet of property line in the UC Plan Area.
- Concerns with edge effects are unresolved.

The UCPG urges the city to restore the best features of the original concept as proposed in the Discussion Draft while **making revisions to meet the goals outlined on p 56**: to improve urban design and support open space as a community resource by *“designing site improvements to minimize the impact of development to open space and to steep hillside areas.”* (p 56)

The D-UCP addresses the concept of “Canyon Adjacent Development” in three places:

- Chapter 3, Urban Design text (“Context-Sensitive Design near Open Space,” p 56)
- Chapter 9, Implementation (“Canyon Adjacent Development,” Policies 2.9 A-E, p 169)
- Chapter 9, Implementation, (CPIOZ, Fig 35, p 186 and SDR C.2, “Building Transition – Open Space,” p 195),

The introduction to the concept (p 56) is expansive, referring to major canyon systems throughout the University Community and “Development” in the most general terms.

By contrast, **Fig 11**, which accompanies the text **appears to refer to the SDR C.2, which refers only to a handful of properties**. These inconsistencies must be ironed out in the Final-UCP.

Recommendations:

The following are UCPG recommendations related to

- the text introducing Context-Sensitive Design near Open Space (p 56);
- Canyon Adjacent Development, Policies 2.9 A-E, (p169); and
- Supplemental Development Regulation C.2 (p 195).

a) Context-Sensitive Design near Open Space, Chapter 3, Urban Design, p 56

Thank you for incorporating UCPG recommendation to include language on shielded lighting and minimizing bird strikes in the introduction to Context-Sensitive Design (p 56).

- Please incorporate UCPG recommendation to balance public access to open space, where appropriate, with protection of sensitive natural resources in conformity with MHPA Land Use Adjacency Guidelines.¹⁷

- Please correct awkward text re “reflective glazing.”

Edit p 56: Context-Sensitive Design Near Open Space, p 56, para. 2:

Development is best when it is designed to recognize the value of open space in supporting habitat and wildlife and serving as a community resource. This can be accomplished by designing site improvements to minimize the impact of

¹⁷ Note, most canyon edge development the University Community identified in Fig 35 adjoins MHPA lands.

development to open space and to steep hillside areas. The Community Plan envisions development adjacent to and/or face canyon open space areas with buildings that locates the tallest portion of buildings furthest from the canyon rim, incorporates a setback from the canyon edges, and steps back upper story levels as illustrated in Figure 11. Building facades with varied design features can help to minimize the potential ~~te~~ for bird strikes. Avoidance of reflective glazing and outdoor lighting that is shielded, directed downward, and faced away from canyon edges can help to reduce reflective glazing that produces glare and light onto the canyon. Where appropriate, Development with paseos, paths, terraces along the canyon edge has the opportunity to provide balance public access and views points to open space with protection of sensitive natural resources.

- Please incorporate UCPG recommendations to include this guidance at the Policy Level.

- Please incorporate UCPG recommendation to clarify the application of Context-Sensitive/Canyon Adjacent Development in this section.

Clarify definition of “canyon” and “canyon edge” for the purposes of this Regulation, pp 56, 169, SDR C.2, 195.

- Please state explicitly that Context Sensitive Development as a feature of Urban Design applies to “canyon edges” throughout the plan, as described in text and Fig 11 on p 56 and in the Urban Design diagrams on pp 79, 83, and 99.

- p. 195, please refer specifically to “Canyon Edge Setback” identified in figures on pp 79, 83, 99. (and Planned Land Uses on p 33).

- Be sure to show canyon/open space edge setback line on map p 87.

b) Canyon Adjacent Development, Policies 2.9 A-E, p 169

- Please incorporate UCPG recommendations to reinforce Urban Design guidance at the Policy level.

b) - Modify/Add to Policies under 2.9 p. 169,

- 2.9B, p 174. Strengthen policy outdoor lighting - to specify fully shaded lighting turned away from open space, following best practice for ESL and MSCP:

2.9 B. “Outdoor lighting near or adjacent to the MHPA or canyon edge should be designed to eliminate light impacts on the MHPA or canyon. All outdoor light fixtures should have hoods that extend below the level of the lighting element to avoid intrusion into MHPA.”

Please incorporate UCPG recommendation to balance access to open space with protection of sensitive resources.

- Modify 2.9 C and D, p 169.

Most of the “canyon adjacent development” in the North Torrey Pines and Campus Point/Towne Centre areas adjoins MHPA lands.

Policy Language should balance responsible access with protection of wildlife and other sensitive resources. Specify type and location of appropriate activities on the mesa top at the canyon edge – which will depend on whether the adjacent canyonlands are in the MHPA or not. Clarify that trail access into canyons should take place at approved trailheads only.

Currently Policy 2.9 C appears to promote illegal trail construction on/to city owned open space lands in contradiction with city policy and D-UCP trails plan (p 130-31).

Modify policy 2.9 C. Replace with:

“For MHPA adjacent development and other sensitive habitat, signs should notify people that access is prohibited and where official public access is available.”

Thank you for incorporating UCPG recommendations to address MHPA guidelines for light and noise.

E.g: 2.9 D. :

“For MHPA adjacent development, common amenities that involve outdoor lighting and potential noise should be located away from the canyon or other MHPA edge and on the other side of buildings from the canyon or other MHPA edge.”

Please incorporate UCPG recommendation to address balance between access and resource protection and more fully incorporate MHPA guidelines:

2.9 D2, Add new policy:

“Balance responsible access with habitat protection. Canyon development adjoining MHPA lands shall follow city LUAG to minimize edge effects due to noise, lighting, and impacts of humans and domestic animals, including use of buffers, fencing, and signage.”

Thank you for incorporating UCPG recommendation for a policy on bird strikes:

-e.g., 2.9 E.:

“Design buildings adjacent to open space and MHPA areas to eliminate bird strikes.”

Please incorporate UCPG recommendation for a policy on native landscaping:

- 2.9 F. Add Policy on Native landscaping

“Prioritize use of native landscaping to maximize biological value and minimize habitat impacts of canyon adjacent development. Avoid planting species on the California Invasive Plant Council’s list of invasive plants for Southern California.”

c) CPIOZ – Supplemental Development Regulation C.2:

Thank you for responding in part to UCPG recommendation to more clearly define the limits and application of Canyon Edge/Open Space in SDR C.2.

The D-UCP clarifies that SDR C.2 applies to:

“Development with a residential use abutting open space zoned properties” beginning at the *“property line that abuts open space zoned property”* (SDR C.2. p 195)

Unfortunately, this definition radically limits the application of the policy.

* **There appear to be just two properties in the plan area that satisfy these conditions (cor. Genesee Ave and Eastgate Mall, see below)**

* A closer look at the property lines, zoning boundaries and actual canyon edges suggests that **not more than 150-200 linear feet of property line might be affected by the new SDR C.2.**

* **Based on SDR C.2, the redrawn CPIOZ for “Canyon-Adjacent Supplemental Development Regulations,” described in Figure 35 is not accurate.**¹⁸

Staff explained to UCPG on Apr 9, 2024, that **SDR 21/C.2** was changed to satisfy the **objections of ONE property owner** who was described as objecting because of a narrow property.

In responding to this concern, **staff have redefined the “building abutting open space” regulation to apply ALMOST ONLY to that property.**

This sets planning on its head. **It is not necessary to abandon the SDR for every canyon adjacent property to satisfy the concerns of one owner.** Instead, the original language of SDR-21 included precisely this type of exception for properties less than 300’ in depth. If necessary, it could be adjusted further to ensure that one owner was not unfairly affected.

A further disadvantage of the revised SDR is that it removes important features to reduce bird strikes and minimize edge effects on adjoining open space areas. These include original

¹⁸ There are no residential zoned properties in the North Torrey Pines area west of I-5. The few parcels zoned for potential mixed use on Campus Point Drive and Towne Centre Drive do not adjoin open space zoned property. The region mapped at the SW corner of Nobel Drive and Genesee Ave adjoins Decoro Street rather than open space. The only parcels to which SDR C.2 appears to apply are at the corner of Genesee and Eastgate Mall.

provision C to orient buildings with the short end facing canyon edge and articulate building facades, features that support bird safe design.

Recommendations:

- Please replace SDR C.2 (D-UCP p 195) with SDR-21 a-d “Building Design Abutting Open Space” (Discussion Draft, p 201) see below.
 - Please revise SDR C.2 following UCPG recommendations:
 - Please restore application of SDR C.2 to: “Development on sites directly abutting an open space area designated in this community plan.”
 - Please define base for setback zones at the canyon edge – as defined by Planned Land Uses (see Figure 33)
 - Please clarify that SDR C.2 applies to “Development” in general (in conformity with CPIOZ area in Fig 35, p 186.
 - Please restore explanatory section introducing SDR C.2.
“Canyon-Adjacent Development The purpose and intent of these supplemental development regulations are to provide design regulations to lessen the effect of buildings developed adjacent to open space areas designated in this community plan.”
(See Discussion Draft, SDR 21, p 201)
 - Please incorporate UCPG recommendations to strengthen adjacency guidelines of former SDR 21 (Discussion Draft):
 - Consider 35’ setback, in conformity with MHPA Brush Management Guidelines
- “SDR C.2 Building Design abutting Open Space:**
Development on sites directly abutting an open space area designated in this community plan shall conform with the following requirements:
- a) *For a premises greater than 300-feet in depth from the street, provide a 35- foot building setback from the open space area.*
 - b) *Provide a 15-foot upper story stepbacks at least 50 feet above the ground level for the portion of the building fronting the open space area.*
 - c) *Orient the short ends of buildings toward the open space areas or break down the length of façades facing the open space areas with articulation in the form of one 4-foot offset in the building plane for every 50 feet of façade length.*
 - d) Design buildings to eliminate bird strikes and intrusion of light and glare into adjacent canyons. The use of highly reflective and mirrored glazing is not permitted fronting open space areas.

Based on the definition selected in SDR C.2, Figure 35 is no longer accurate. “Canyon Adjacent Supplemental Development Regulations” do not apply to the region mapped.

The only parcels to which SDR C.2 appears to apply are at the corner of Genesee and Eastgate Mall.



J. Integrate/Strengthen Language RE Environmental Protection in Parks and Recreation

Thank you for incorporating UCPG recommendation to support restoration:

- E.g. Parks and Recreation Goal 6, p. 121:

“Protect, preserve **and restore** natural areas and sensitive biological resources.”

Please incorporate UCPG recommendation to:

- Modify language, Parks and Recreation Goal 7, p 121

“Promote sustainability by utilizing “green technology” and other sustainable practices, such as “green streets” that double as pedestrian amenities, stormwater infrastructure, **and ecological enhancements**.¹⁹

Thank you for incorporating UCPG recommendation:

¹⁹ See E. Akins, “Green Streets as Habitats for Biodiversity,” in *Nature Based Strategies for Urban and Building Sustainability* (Heineman, 2018), 251-60.

- Add language, p. 122, par 1 - Introduction to Parks and Recreation:

“The community’s open space lands also form a critical part of the city’s Multiple Habitat Planning Area, including protected habitat and wildlife corridors for sensitive species.”

Please incorporate UCPG recommendation to emphasize primary role of open space parks typology – “to protect habitat” with compatible passive recreation:²⁰

- Modify language, p. 124 – paragraph 4,

“This open space is intended to preserve and protect native plants and animals, while providing for compatible **passive recreation** and enjoyment.”

Thank you for incorporating UCPG recommendation to update map and key, Fig. 26 (now Fig 29) to clearly identify designated and dedicated open space.

- Correct language in Figure 29, University Community Open Space, p 143.

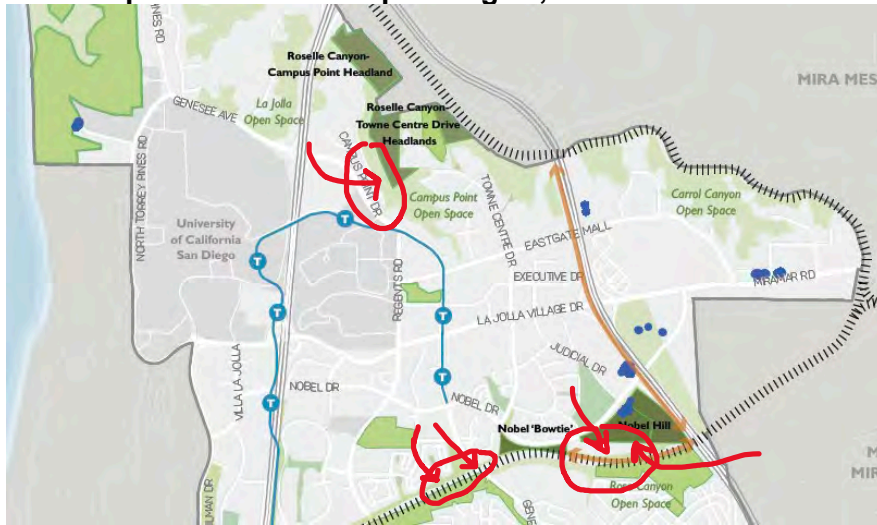
Clarify use of “designated” and “dedicated” open space – it is confusing.

Please complete UCPG recommendation to fully correct Fig 29:

- Update Fig 29 to include ALL dedicated open space in UC.
- Currently, three noticeable parcels are missing.
- Please update map to include the following dedicated open space parcels:
 - Campus Point Open Space (west slopes of Roselle Canyon)
 - Lucera finger canyons (east Rose Canyon)
 - Monarch property (east Rose Canyon/Nobel Hill)
- The same error applies to Figures 2, 3, 4, 5, 6, 13, 18, 20, 22, 23, 24, 26
- Update base maps throughout D-UCP to accurately reflect existing dedicated open space.

²⁰ See *Parks Master Plan*, Park and Recreation Facility Typologies: “Open Space,” 21 and 32.

Please update the base map for Fig 29, et al.



K. 4.2 Trails, Overlooks and Pocket Parks, p 184-178

Please incorporate UCPG recommendation to
Add-revise Policy 4.2 A1, p 178: Priority for Overlooks adjacent to MHPA²¹

- revision for consistency with UCPG recommendation for new policy 4.2 A1 below

“Adjacent to open space areas in the MHPA and coastal zone, prioritize scenic overlooks and overlook parks over trails and trailheads to provide access to nature balanced with protection of habitat and biodiversity.”

IX. POLICY RECOMMENDATIONS –

Parks and Recreation – Open Space and Conservation:

RE: Table 1: Plan Policies, 4.0 Parks and Recreation Policies, p 176-78

4.1 F. Please incorporate UCPG recommendation to update policy 4.1 F to clarify that recreation needs will be met in conformance with the Parks Master Plan standard:

4.1 F. Preserve, expand and enhance existing recreation centers and aquatic facilities to increase their life span, meet current and future recreation needs (in conformance with the Parks Master Plan), or expand their uses and sustainability

4.1 F 1. Please incorporate UCPG recommendation to add a new policy.

²¹ This policy is a win-win that balances recreational goals with legal imperatives, such as protection of sensitive habitat, MSCP and coastal guidelines, etc. Recreational value points represent functionally equivalent recreational experiences. Scenic overlooks within a ½ mile walk of residential neighborhoods or mixed-use areas are equal to similarly situated trailheads – 7 points each. (see PMP, Appendix D, p 20).

4.1 F 1. Assure public access to recreation and aquatic center facilities in Weiss Eastgate Park.

4.1 J. Thank you for incorporating UCPG recommendation:

I.e.,

4.1 J. Separate the two ideas conflated in 4.1 J.

4.1 J1. Promote open space conservation and restoration of natural lands.

4.1 J2. Provide open space linkages where appropriate, including trailheads for bike and pedestrian access with appropriate, visible, and clearly marked entrances.

4.1 M. Thank you for incorporating UCPG recommendation to support nature-based stormwater solutions and urban greening:

I.e., **4.1 M.** Promote the greening of streets using vegetated swales, rain gardens, permeable pavements, and other alternative compliance stormwater design features as well as through investments in a robust urban forest. Protect water quality in coastal watersheds by minimizing storm flow leaving developed areas.

4.1 O. Thank you for incorporating UCPG recommendation to support use of native vegetation:

I.e., **4.1 O.** Coordinate with Caltrans to plant trees and native shrubs in landscape areas within freeway rights-of-way to improve air quality and provide visual relief.

4.1 S. Thank you for incorporating UCPG recommendation to protect coastal watersheds as well as open space from stormwater runoff:

I.e., **4.1 S.** Maintain natural drainage systems and minimize the use of impervious surfaces to protect open spaces and coastal watersheds. Concentrations of runoff should be adequately controlled through pervious areas, vegetated swales, and retention basins to prevent downstream erosion.

4.1 U. Thank you for incorporating UCPG recommendation to enhance biodiversity through native landscaping:

I.e., **4.1 U.** Emphasize native landscaping and design features that enhance biodiversity.

4.2 Trails, Overlooks and Trailhead Pocket Parks

4.2 A 1. Please Add New policy.

4.2A1. “Adjacent to open space areas in the MHPA and coastal zone, prioritize scenic overlooks and overlook parks over trails and trailheads to provide access to nature balanced with protection of habitat and biodiversity.”

4.2 B. Thank you for incorporating UCPG recommendation to meet MSCP Land Use Adjacency Guidelines in 4.2 K (below). That change is unnecessary here.

Please incorporate UCPG recommendation to modify awkward language (“cultural habitats”)

I.e., 4.2 B. Preserve and protect city-owned open space canyons and hillsides by providing overlooks, kiosks, interpretive signage, and wayfinding elements to educate users on the sensitive natural habitats and unique biologic, *cultural*, and scenic qualities of these areas. Note: Features shall be in conformance with existing MSCP and MHPA guidelines.

4.2 C. Thank you for incorporating the spirit of UCPG recommendation to highlight appropriate trails planning process.

I.e., 4.2 C. Connect adjacent communities to trails and trail-adjacent parks by *improving existing trails or providing new ones, where appropriate and in conformance with Parks Master Plan and all applicable limitations, such MSCP consistency findings, ESL regulations, Natural Resource Management Plans.*

4.2 D. Thank you for incorporating UCPG recommendation to restore native vegetation in open space areas.

Please incorporate UCPG recommendation to remove the qualification “where possible”.²²

I.e., 4.2 D. Retain **and restore** native vegetation in open space areas.

4.2 F. Thank you for incorporating UCPG recommendation to clarify policy on vernal pools.

I.e., 4.2F. Preserve and manage vernal pools in accordance with the Vernal Pool Habitat Conservation Plan. *Seek opportunities to restore vernal pools where appropriate, including working cooperatively with property owners.*

4.2 G. Thank you for incorporating UCPG recommendation to reference NRMPs:

I.e., 4.2 G. Implement applicable requirements of the Environmentally Sensitive Lands regulations, Biology Guidelines, *Natural Resource Management Plans*, and MSCP Subarea Plan for preservation, mitigation, acquisition, restoration, and management and monitoring of biological resources.

4.2 J. Thank you for incorporating UCPG recommendation to support nature-based solutions and green infrastructure in storm water infrastructure.

²² Primary purpose of open space parks is to “protect habitat” (i.e. native vegetation and wildlife). See *Parks Master Plan*, Parks and Recreation Facilities Typologies, p 21, also p 32.

I.e., **4.2 J.** Repair and retrofit storm drain discharge systems to prevent erosion and improve water quality by adequately controlling flow and providing filtration. Use green infrastructure in developed areas to reduce flows into the storm water system. Storm drain outfalls should limit the use of concrete in favor of more natural, vegetated designs, including streambed bioengineering.

4.2 K. Thank you for incorporating UCPG recommendation to reference MHPA Adjacency Guidelines to protect sensitive habitat.

I.e., **4.2 K.** Ensure “buffer zones” sufficient to protect environmentally sensitive habitat areas for new development are determined through the criteria contained within the Environmentally Sensitive Lands regulations, and MHPA Land Use Adjacency Guidelines.

4.2 L. Thank you for incorporating UCPG recommendation to strengthen policy on wildlife corridors.

I.e., **4.2 L.** Preserve identified wildlife corridors and prevent habitat fragmentation by requiring conformance with MSCP guidelines such as restricted development, buffers, landscaping, and barriers. Seek opportunities to enhance wildlife corridors through man made crossing structures, wildlife friendly fencing, land acquisition, and other best practices.

4.2 M. Please incorporate UCPG recommendation to

Add a policy - 4.2 M- to protect sensitive riparian areas with specific policy, including potential setbacks. Recommend 100’.²³

Or... consider specific setback policy in 5.10B (below)

Table 1, Conservation and Open Space Policies, Sections 5.6-16, p 179-81

5.6 Biological Resources

5.6 A. Please support UCPG recommendation to preserve native vegetation and revegetate disturbed areas using native species by removing qualifier, “where feasible.”

Edit typo, “vegetated.”

5.6 A. Retain native vegetation 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.

²³ This change supports Guiding Principle 6, “Sustainable Community,” (“watershed protection”) p 13 and Open Space and Conservation Goal 2 (“preservation... of wetland resources”) p 135.

5.6 D. Thank you for incorporating spirit of UCPG recommendation to preserve wildlife corridors and reduce habitat fragmentation including support for best practices.

5.6 D. Preserve identified wildlife corridors and prevent habitat fragmentation by requiring conformance with MSCP guidelines such as restricted development, buffers, landscaping, and barriers. Seek opportunities to enhance wildlife corridors through crossing structures, wildlife friendly fencing, land acquisition and other best practices.

5.12 Coastal Resources,

5.12 A. Thank you for incorporating UCPG recommendation to protect species and wildlife corridors.

I.e., **5.12 A.** Ensure buffer zones sufficient to protect environmentally sensitive habitat areas, special status species and wildlife corridors from new development as determined by criteria contained within Environmentally Sensitive Habitat Areas (EHSA).

5.13 Area Specific Conservation and Open Space Policies

5.13 A. Thank you for incorporating UCPG recommendation to identify Roselle Cyn among protected open space areas.

I.e., **5.13 A.** Preserve the open space areas of Torrey Pines Mesa and coastal area, Sorrento Valley, Roselle and Soledad Canyon hillsides and canyons, Rose Canyon, San Clemente Canyon and areas most severely impacted by aircraft overflights.

5.13 B. Thank you for incorporating UCPG recommendation to support coastal and canyon viewsheds in Sorrento Valley and Roselle Cyn.

Please edit for clarity – Roselle Canyon is the canyon area between Campus Point and Towne Centre Drives.

Language, “within scenic overlooks,” is unclear. Is the policy designed to protect viewsheds or to promote development of scenic overlooks?

5.13 B. Preserve the scenic qualities of the surrounding coastal and canyon viewshed areas within scenic overlooks in Rose Canyon, San Clemente Canyon/Marian Bear Memorial Park, Sorrento Valley, and Roselle Canyon and the canyon area between Campus Point Drive and Towne Centre Drive.

5.13 B1. Please incorporate UCPG recommendation to Add a policy on Ocean scenic views:

5.13 B1. Preserve the scenic value of ocean views from public areas and street rights of way.

5.13 C. Thank you for incorporating UCPG recommendation to reference adopted General Development Plan for TPC Park.

I.e., 5.13 C. Develop the Torrey Pines City Park in accordance with the Torrey Pines City Park General Development Plan to enhance unique recreational opportunities, such as beach access and gliding activities, while preserving existing biological and archaeological resources and topographic features.

5.13 E and F.

Please incorporate UCPG recommendation to clarify policy language and support protection of MSCP and other ESL lands in Soledad Canyon.

Use of a floating prepositional phrase makes **policies** unclear. Note: Most of Soledad Canyon slopes are already protected by MHPA guidelines.

Consider adding phrase “in conformance with existing MSCP and MHPA guidelines.”

Modify 5.13 E. Avoid disturbance of the *hillsides* in Soledad Canyon Open Space in conformance with existing MSCP and MHPA guidelines and adjoining MHPA areas. Outside of MHPA, mitigate hillside disturbance with contour grading and revegetation with native species.

Modify 5.13 F. Preserve steep hillsides facing the canyons in Soledad Canyon Open Space in conformance with existing MSCP and MHPA guidelines by establishing conservation easements and dedications in conjunction with new development.

5.13 F 1. Please incorporate UCPG recommendation to Add policy 5.13 F.1 to provide “area specific” application supporting general wildlife corridor policies, 4.2 L, 5.6 E, and 5.12 A.

5.13 F.1. Protect and enhance the wildlife corridor in Soledad Canyon Open Space area to assure safe wildlife connection between MCAS Miramar, Rose Creek and Carroll Creek/Peñasquitos Watersheds.

5.13 ##. Please incorporate UCPG recommendation to Add a general policy to require local habitat mitigation.²⁴

5.13 ##. Perform required habitat mitigation for projects in the University Community within the UC Plan Area, with a preference for mitigation within the same watershed.

5.13 I. Thank you for incorporating UCPG recommendation to protect watershed habitats.

I.e., 5.13 H. Protect and restore Rose Canyon ecosystems and watershed habitats.

5.13 I. Please incorporate UCPG recommendation to DELETE and REPLACE language.

Language is unclear and suggests opening Rose Canyon Open Space Park for “major grading and construction” and uses other than passive recreation. This is inappropriate for MHPA and open space parks and counter to consistent community feedback.

²⁴ This supports the consistent view and recommendation of UCPG offered in re. specific projects for many years.

5.13 I. Protect and restore Rose Canyon Open Space Park for education, research, stewardship, and passive recreation.

5.13 J. Thank you for incorporating UCPG recommendation to delete policy.

I.e., Delete Policy 5.13 J: This is infeasible and unnecessary. RR is in the riparian area. Nearby bridge on Genesee Avenue is an appropriate connection.

5.13 J 2 Please incorporate UCPG recommendation to Add new policy 5.13 J2 to pursue direct means of connectivity between East UC and UCHS/Genesee Ave.

5.13 J2. Seek an easement from San Diego Unified to permit public access through University City High School between Robbins Street and Genesee Avenue.

5.13 K. Please incorporate UCPG recommendation to Delete Policy 5.13 K. Policy is unsafe and lacks a specified use. Human access in RR ROW is proscribed except with a flagman. **Providing public access to MCAS Miramar (the lands east of I-805) is counter to Department of Defense policy.**

5.13 M. Please incorporate UCPG recommendation to reference the *fourth* branch of San Clemente Canyon (the open space canyon that connects Standley Park with Marian Bear Park).

5.13 M. “Preserve the **four** branches of San Clemente Canyon which extend northward into South University City as open space by retaining existing open space dedications and easements. These areas include 19.47 acres between Stadium Street and Tulane Street, approximately xx acres extending from Standley Community Park through the SR-52 undercrossing to Marian Bear Park; approximately three acres west of Kantor Street and 15.47 acres east of Gullstrand Street. “

5.13 M 1. Please incorporate UCPG recommendation to Pursue re-use of Town Park Villas golf course as community park

Add policy 5.13 M1 “Pursue acquisition or joint use agreement for former Town Park Villas golf course as a community park.”

5.13 P. Thank you for incorporating UCPG recommendation to support Gilman Drive open space corridor and completion of the Coastal Rail Trail.

I.e., 5.13 P. Enhance the visual quality and continuity of the Gilman Drive open space corridor through completion of the Coastal Rail Trail and landscaping and site design on private properties abutting the street and adjacent to the canyon.

5.14 Sustainability

5.14 C. Please incorporate UCPG recommendation supporting policy on green building and electric buildings.

5.14 C. Utilize sustainable design that reduces emissions, pollution, and dependency on non-renewable energy sources, makes efficient use of local resources, and incorporates best practices in green building and sustainable landscaping, water use, and storm-water management. Prioritize building all-electric buildings and Net Zero construction.

5.15 Energy Conservation:

5.15 D. Thank you for incorporating UCPG recommendation to support charging stations.

I.e., 5.15 D. 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 bicycles, and other incentives.

5.16 Water Conservation:

5.16 B. Thank you for incorporating UCPG recommendation to support native landscaping.

I.e., 5.16 B. Utilize native, drought-tolerant plants and efficient watering systems as part of landscaping plans. In addition, as health laws allow. “Gray Water” or water reuse systems should be explored for application within the community.

X. Implementation

The UCPG has serious concerns over the lack of a clear plan for Implementation in the Draft-UCP, and specifically the provision and financing of infrastructure and public facilities.

Recommendations:

- The UCPG recommends that the **Final UCP** provide a clearer, more transparent, and more robust explanation of how infrastructure and public facilities will be provided and paid for in support of projected growth.
- This should include a **clear explanation of how parks and bike infrastructure will be paid for**, how infrastructure at large will be paid for, and how land for parks will be acquired.
- The UCPG recommends that **the city study funding and implementation strategies** for infrastructure similar to the Keyser Marston analysis of affordable housing.
- This study should evaluate **supplemental strategies to provide infrastructure**, including: the potential for **Supplemental Development Impact fees** (a “Future Opportunities Fund” for parks and other infrastructure), **enhanced SDR’s** for parks, bike infrastructure, or other needed public facilities, Maintenance Assessment Districts,

Community Parking Districts, as well as **other potential land value capture tools** to provide infrastructure.

Alternative Views: Support supplemental development fees or FBAs. However, the idea of capturing a portion of land value increase for city/government is of great concern. Will it be applied equitably across development types and sizes? E.g., Will condominiums and single-family houses be assessed for increases in value because their community got bigger/stronger?

Alternative Views: Greater density of development may be a means of raising revenue for infrastructure. A study by Urban 3 suggests that higher density housing raises more tax revenue than single family housing. Bringing more taxpayers to the community through higher density where it makes sense (such as near the Trolley) will bring more revenue to support infrastructure. We should support higher densities to support higher tax revenues.

¹ See San Diego Municipal Code, chapter 13, Table 132-15D, Noise Compatibility Criteria for MCAS Miramar, Brown Field Municipal Airport, Montgomery-Gibbs Executive Airport, and NOLF Imperial Beach Airport Influence Area.

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.***

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.***

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.***

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>

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.

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.***

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.

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.

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.***

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.

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.

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.

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.

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.***

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.***

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.***

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,

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***

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.

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.

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.

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.”

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.

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

-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).***

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.***

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.***

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.***

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.

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.

<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)

See response to 3.2.1.4 on deficits in housing plan.

P 139. 3.5.3.1

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.***

P 139. 3.5.3.1

See response to 3.2.1.4

P 140. 3.5.3.1 (affordable homes requirement)

See 3.2.1.4

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.

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.***

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.***

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

whole (not merely block by block). ***The DEIR should analyze the environmental effects of development without associated infrastructure in a worst-case scenario.***