

Community Planners Committee

Blueprint SD Responses

Revised 4-22-24

Contents

Executive Summary..... 2

Land Use and Community Planning Element..... 6

Mobility Element..... 13

Urban Design Element 19

Economic Prosperity Element..... 27

Public Facilities, Services and Safety Element..... 29

Recreation Element..... 31

Conservation Element..... 32

Noise Element..... 36

Glossary..... 37

Executive Summary

This document provides the responses of the Community Planners Committee to Blueprint SD, which is an update to San Diego's General Plan. This section summarizes the responses to each of the elements in Blueprint SD, followed by sections that detail each element.

Land Use and Community Planning Element

Proper planning starts with transparent and realistic estimates of San Diego's future population growth and housing needs. The most recent and authoritative forecast (SANDAG Series 15) projects that the City of San Diego will increase in population by only 65,345 residents between 2022 and 2050. Despite these projections, which reflect statewide, national, and global trends, San Diego continues to plan for unlimited future growth based on outdated data.

Allowed density must be appropriately scoped to the expected buildout of communities. Unnecessary overzoning drives up land prices and rents. As summarized by Patrick Condon, author of *Sick City*, "No amount of opening zoning or allowing for development will cause prices to go down. We've seen no evidence of that at all."

Realistic estimates of future housing allow planners to properly define the future shape of the City, including where to concentrate development, and what the height and density of neighborhoods should be.

Blueprint SD's stated goal of "Mixed-use villages located throughout the City that are connected by high quality transit" is outdated with regard to advances in personal mobility options and the anticipated future availability of micromobility and eventually autonomous vehicles, which de-prioritize fixed-route connectivity between villages and instead allow each village to be considered on its own local merits. Further, transition to electric vehicles will take place much more quickly than build out of fixed route transportation networks.

Blueprint SD identifies City of Villages as taking advantage of natural environment and job centers. This is not supported by reliable data. For example, Mission Valley is a huge physical impediment to mobility and access to employment centers in the northern half of the city. Further, San Diego's distributed job centers and overall low population density make it unrealistic to create an effective transit network that can replace point-to-point commutes for most San Diegans.

Overly large Sustainable Development Areas (SDAs) push development away from village centers. Development should be concentrated along transit corridors to create destinations that are walkable, livable spaces, with commercial, entertainment, and residential opportunities.

Development should be prioritized towards existing transit, not future transit (as far out as 2050) that with expected funding constraints may never be built.

Much of San Diego's planning overemphasizes transit access to downtown. Current planning needs to reflect that over time development has spread out, based on automobile suburbs and freeway access to widely distributed (polycentric) job centers. The Village Propensity Map reflects these outdated assumptions of transit and economic opportunity.

Mobility Element

Transit usage depends on high population density to support the concentration of activities at transit destinations that make transit usage convenient and efficient. Because the population of San Diego is so spread out, there is no amount of service that will turn most of San Diego's drivers into riders. San Diego's transit-oriented development plans can only succeed by concentrating development around high quality transit lines, particularly adjacent to trolley lines.

Automobile suburbs – most of San Diego – will remain automobile suburbs, particularly if new development is randomly spread around the city instead of intentionally concentrated near high-quality transit that has convenient and competitive access to job centers.

The Village Propensity Map for south of I-8 communities is based on long outdated transit patterns that took residents in the 1930s and 1940s to the primary job centers of downtown and Midway. Further, the model used to create the map presumes that everyone that lives near transit will take transit. The model then simulates that behavior without accounting for how residents will be motivated to give up automobiles and instead use a transit system that is largely rigid, impractical, inconvenient transit. The rolling hills and interconnected canyons which are characteristic of San Diego makes transportation via the automobile a “must” for the vast majority of San Diego families and the City's aging population.

Urban Design Element

A thoughtful, comprehensive, and self-adapting Urban Design element is necessary to clearly define spatial relationships between buildings and surrounding land uses. It is critical to guide future growth that is not only compatible with its surrounding buildings and the public realm, but complements the implementation of the desired densities identified in Blueprint SD.

Bonus density incentives, particularly Complete Communities Housing Solutions, override deliberate planning without considerations of the local conditions of the project. To mitigate these effects and set proper expectations for both developers and residents, San Diego should consider form-based codes that ensure good outcomes, including angle planes (relative both to neighboring buildings and street widths, with 45 degrees being the preferred angle), setbacks, objective design standards, floor area ratios (FARs), and other public-facing aspects of the development.

Historic preservation should be rightfully considered as form-based code that naturally provides compatibility with neighboring buildings. Historic preservation is also a key method for achieving the City of Villages' place-making goals. Other benefits are that it reduces construction waste (25% of San Diego's landfill) and supports higher paying construction jobs.

The City has been moving towards allowing as many projects as possible to be processed ministerially. Ministerial projects have no requirement for public notice, no public hearings, no right of appeal, and no requirement to follow Community Plans. Further, ministerial approvals give Development Services full authority to interpret ambiguous land development codes without public or Council input. Blueprint SD should include policies to require discretionary processing for projects that exceed certain density or size thresholds.

Economic Prosperity Element

Blueprint SD correctly identifies that economic growth and opportunity is unevenly distributed across San Diego, but presents no concrete, actionable proposals for how to address this. There needs to be a plan for economic development in south of I-8 communities.

The areas south of I-8, and other low resource areas, need to become economically balanced with the rest of the city. Development in these areas needs to focus on building moderate and market rate housing and employment areas to draw up the average incomes in the areas. Concentration on improvements in education is also needed in these areas.

Low income housing added to these areas will compound inequity problems, including low economic opportunity, low education, lack of recreation opportunities, lack of grocery stores, pharmacies, healthcare facilities.

For the envisioned balanced villages, development in the high resource areas needs to meet the city's target of a minimum of 10% onsite inclusionary housing, so people with low incomes are able to live near where they work, get better educations and have amenities available in close proximity to their homes.

Public Facilities, Services and Safety Element

The City should re-commit to providing adequate public facilities concurrent with development. Given that San Diego has reduced or eliminated fees on much of its development, it is unclear where the city will get funding for these public facilities.

San Diego should not be promoting development in high fire hazard zones, as it does with the Bonus Accessory Dwelling Unit program and Complete Communities Housing Solutions.

When community plan updates occur, include an analysis of Land Value Capture, as a way to provide revenue for needed public facilities and community benefits.

Recreation Element

The lower fees in the Parks Master Plan mean that there is less funding for parks overall. Almost every community in San Diego is park-deficient and there isn't a clear plan to catch up. Recent community plan updates can't even meet the much lower bar set by the Parks Master Plan and its controversial points system. Clearly, we need new strategies for reaching our park goals.

The City should continue to prioritize converting surplus city-owned land in park-deficient communities into parks. Otherwise, because the City has eliminated its Planned District Ordinances (PDOs) that required developers to provide onsite outdoor space, the only choice the city has is to purchase land from private owners at prices inflated by the City's own actions.

Conservation Element

The vast majority of San Diego's residents rely on automobiles for daily activities. To change transportation choices, San Diego needs to intentionally focus density onto commercial and transit corridors rather than spreading it into San Diego's existing automobile-dependent suburbs.

One-quarter of all landfill in San Diego is construction waste. San Diego should be reducing this waste through adaptive reuse.

Heat island effects are increased by infill development that clear-cuts urban canopy. We should be planting more trees and not removing the ones we have.

San Diego's conservation efforts are undermined by land use policies, including Complete Communities Housing Solutions, Bonus ADUs, and SB 9, that are highly preferential to dense development along canyon and mesa rims in Very High Fire Hazard Severity Zones.

San Diego is being overconfident about its water-sufficiency. San Diego needs a contingency plan whereby if external water supplies are reduced or disrupted, San Diego can rely on reservoirs, Pure Water recycling, and desalinization. As was demonstrated by the recent flooding, as we lose permeable surfaces to infill development, we will experience more runoff flooding homes and going into sewers rather than being absorbed into the ground.

Noise Element

In order to reduce noise along transit and mixed-use corridors, design elements should include provisions for noise abatement, including adequate angle planes and setbacks to disperse ground noises.

Glossary

Given their relevance to the Land Use, Mobility, and Economic Prosperity Elements of Blueprint SD, the assumptions of Climate Equity Index (<https://www.sandiego.gov/climateequity>) should be reexamined to justify whether the Climate Equity Index is being properly calculated and truly assesses the circumstances of San Diego neighborhoods. This is particularly true with regard to the overweighting of archaic transit routes in south of I-8 communities, which do not take residents to high-quality job centers.

Regarding the definition of "Structurally Excluded Community," a key structure of exclusion in San Diego is the overextension of Sustainable Development Areas (SDAs) and Transit Priority Areas (TPAs) as applied to the south of I-8 communities that constitute the areas of greatest needs. This results from the unwarranted extent of the SDA (up to 1 mile from transit), inclusion of future transit stops instead of limiting to existing transit, and failure to recognize that the transit routes in these areas are vestiges of the mid-1900s when downtown was the major job center for the city, and therefore do not meet the outcome-based standards of high-quality transit.

Land Use and Community Planning Element

Review the current City Planning draft element [here](#).

SUMMARY RESPONSE

Proper planning needs to start with transparent and realistic estimates of San Diego's future population growth and housing needs. The most recent and authoritative forecast (SANDAG Series 15) projects that the City of San Diego will increase in population by only 65,345 (4.8%) residents between 2022 and 2050. Despite these projections, which reflect statewide, national, and global trends, San Diego continues to plan for unlimited future growth based on outdated data. In particular, the Draft Blueprint San Diego relies on 2019 Series 14 forecast projections, and the Series 15 forecast cited above is substantially less than the previous projection.

Allowed density must be appropriately scoped to the expected buildout of communities. Unnecessary overzoning drives up land prices and rents. As summarized by Patrick Condon, author of *Sick City*, "No amount of opening zoning or allowing for development will cause prices to go down. We've seen no evidence of that at all."

Realistic estimates of future housing allow planners to properly define the future shape of the City, including where to concentrate development, and what the height and density of neighborhoods should be.

Blueprint SD's stated goal of "Mixed-use villages located throughout the City that are connected by high quality transit" is outdated with regard to advances in personal mobility options and the anticipated future availability of micromobility and eventually autonomous vehicles, which de-prioritize fixed-route connectivity between villages and instead allow each village to be considered on its own local merits. Further, transition to electric vehicles will take place much more quickly than build out of fixed route transportation networks.

Blueprint SD identifies City of Villages as taking advantage of natural environment and job centers. This is not supported by reliable data. For example, Mission Valley is a huge physical impediment to mobility and access to employment centers in the northern half of the city. Further, San Diego's distributed job centers and overall low population density make it unrealistic to create an effective transit network that can replace point-to-point commutes for most San Diegans.

Overly large Sustainable Development Areas (SDAs) pushed development away from village centers. Instead, development should be concentrated to create destinations along transit corridors that are walkable, livable spaces, with commercial, entertainment, and residential opportunities.

Development should be prioritized towards existing transit, not future transit (as far out as 2050) that with expected funding constraints may never be built. Dispersion of development (via Sustainable Development Areas that define transit-oriented development as any part of the city that is within an unrealistic one-mile walking distance to transit lines) undermines the City's Climate Action Plan.

Much of San Diego's planning overemphasizes transit access to downtown. Current planning needs to reflect that over time development has spread out, based on automobile suburbs and freeway access to

widely distributed (polycentric) job centers. The Village Propensity Map reflects these outdated assumptions of transit and economic opportunity.

Coupling overly dense zoning with the removal of parking produces a spike and sprawl pattern of development whereby scattered highrises are surrounded by zones of exclusion between projects, which must be far enough away to similarly absorb on-street parking. Finally, disconnected development hinders the creation of coherent commercial districts that would promote walkability.

San Diego's zoned housing capacity is dwarfed by its bonus incentives in commercial/multi-family and single-family zones. Because these bonus programs override community plans, the resulting developments create infill sprawl by pushing development away from transit and separating activities.

The excessive zoning overrides in Complete Communities Housing Solutions also confound the community plan update process because CCHS targets lower density zones that are intended for transitions between dense transit-oriented development and lower-density residential.

The misconstruction of the SDA drives two negative outcomes: first, turning single-family neighborhoods into de facto multi-family zones via Bonus ADUs and the proposed SB 10 implementation allows opportunistic investors to crowd out would-be homeowners; and second, diffusing development across an overly broad SDA inhibits the creation of neighborhood-centering density that is essential to the success of City of Villages, both for neighborhood economic development and for transit efficiency and connectivity.

DETAILED COMMENTS

p. LU-6 – LU-8 Tables LU-1 – LU-3 (revised)

Calling out the acreage for residential misleads that these areas should be prioritized for development. Given that we are only adding 200,000 people between now and 2050, we only need to put these people on 10,000 acres to be above the critical density threshold for transit adoption. Note that Table LU-3 identifies 3,600 acres of vacant land, some of which could be used to meet housing needs without landfilling existing structures.

p. LU-8 Goals

Added goals are good, but the carryover goal of "Mixed-use villages located throughout the City that are connected by high quality transit" is outdated with regard to expected adoption of electric and autonomous vehicles, which de-prioritize fixed-route connectivity between villages and instead allow each village to be considered on its own local merits.

Further, transition to electric vehicles will take place much more quickly than build out of fixed route transportation networks.

p. LU-8 A. City of Villages Strategy

The goal of “Mixed-use villages located throughout the city that are connected by high-quality transit” should be based on Proximity/Time to the nearest major employment center should be a component of the definition of high-quality transit.

Discussion (added) [NOTE: citations from the Blueprint SD draft are highlighted in blue throughout this annotated critique of the plan.]

The city strives to be a leader in sustainability and proactively address the challenges presented by climate change. Much of the city is shaped by homes located far away from places of work, school, and other daily needs. This pattern has resulted in significant traffic congestion and harmful pollutants, or greenhouse gas emissions, that worsen our environment and air quality. The limited availability of homes to serve the needs of the city’s diverse population has further worsened emissions by creating long distances and lengthy travel times to daily destinations. Due to the limited availability of developable vacant land, infill and redevelopment must play an increasing role in providing homes and jobs to support the city’s future growth.

Identifies City of Villages as taking advantage of natural environment and job centers, but Mission Valley is a huge impediment to mobility and economic opportunity. Further, San Diego’s polycentric job centers and overall low population density make it unrealistic to create an effective transit network that can replace point-to-point commutes for most San Diegans.

Overly large Sustainable Development Areas (SDAs) mean that development is pushed away from village center. The plan needs to focus more on walkability rather than adding more ways to get somewhere else.

Much of San Diego’s planning is stuck in a 1940s mindset that prioritizes transit access to downtown rather than recognizing that San Diego’s post-WW II development was based on automobile suburbs and freeway access to widely distributed (polycentric) job centers.

This shift in mobility was accompanied by a shift in housing and employment to the north of Mission Valley.

p. LU-8 Village Types

Blueprint SD proposes a revised set of Village Types:

Downtown (p. LU-11) – continues to be overweighted in San Diego’s planning, especially as the imagined economic and cultural center of San Diego.

Subregional Employment Areas (p. LU-11) – Mid-city is not a regional employment area, yet is mistakenly accentuated in the propensity map because of vestigial transit to employment that no longer exists downtown.

Urban Village Centers (p. LU-12) – Despite being centrally located via freeway and trolley access, Mission Valley remains underzoned, including CCHS FAR allowance.

Community and Neighborhood Village Centers (p. LU-13) – These should be central element of CPUs instead of the afterthought that they have been, particularly as CPUs move to underserved communities that could substantially benefit from revitalization. CPUs lack any substantial consideration of economic development and prosperity, small business or otherwise.

Transit Corridors (p. LU-14) – This added definition states that:

[Transit Corridors - The city contains a significant number of linear commercial areas that are lively and vital, pedestrian-friendly, and home to a rich variety of small businesses, restaurants, and homes. They are located along streets and major roads and are served by higher speed and more frequent transit service. These Transit Corridors provide valuable new home opportunities with fewer impacts to the regional freeway system because of their available transit service.](#)

The propensity map contradicts the statement that “These Transit Corridors provide valuable new home opportunities with fewer impacts to the regional freeway system” particularly as it relates to the overweighting of Mid-City. Housing in Mid-City lacks viable high-volume public transportation to take residents across Mission Valley to employment centers in Kearney Mesa, University/Sorrento Mesa, Rancho Bernardo, or elsewhere. The transit system in Mid-City is designed to take residents downtown, and that’s it.

San Diego should focus intensity on its transit corridors by shrinking SDAs to walkable distances to existing transit. Development should create destination nodes within corridors that are more walkable, livable spaces, with commercial, entertainment, and residential opportunities.

Figure LU-1 Village Propensity Map (p. LU-17)

The Village Propensity model has a number of flaws in its application to Mid-City, including:

- The east-west transit lines on El Cajon Boulevard and University Avenue are oriented to the mid-1900s, when Downtown was the primary employment center. This transit does not effectively get residents to employment, shopping, recreation, and other areas north of I-8.
- Not only does it fail to consider the profound topographic barrier of Mission Valley, it also fails to understand how the topography of Mid-City itself inhibits walkable village centers.
- The Economic Development Element does not propose any meaningful economic development for Mid-City, which will perpetuate its circumstance as a commuter suburb of San Diego, with detrimental effects to air quality and VMT.
- The 2050 regional plan is unrealistic in its projections for San Diego’s population growth and available funding for a major buildout of the transportation system.

San Diego would do better to concentrate future development around existing transit, especially existing trolley lines. In other areas it makes sense to create community centers that provide local, walkable destinations for residents. In this regard, the plan should distinguish planning for different mobility modes instead of citing the all-inclusive language of “convenient and affordable opportunities to walk/roll, bike and ride transit.” Each of these modes serves a different need of residents, and effective planning needs to account for when these needs conflict and require compromises.

There are several patterns that emerge from the Village Propensity Map:

- Downtown –while its importance as a job center has waned with passing decades, this has been counter-balanced by the transformation of downtown into a major entertainment and residential center.
- Tech/Life Sciences job centers – the biggest locus is UTC (which also captures UCSD), and also extends less intensely across Mira Mesa Blvd., with an uptick in intensity around the I-15 junction.
- Tourism/Lifestyle – commercial and multi-family corridors from I-5 to the ocean in Pacific Beach and the Midway district through Ocean Beach
- Barrio Logan – combination of direct access to downtown employment and local industrial uses, which provide higher paying jobs but with environmental concerns.
- Mid-City – this is based on “high-quality” transit; however, most of the transit routes are vestiges of the mid-1900s when downtown San Diego was still the dominant job center in San Diego. As job patterns have changed, mid-city and southeast San Diego have been left behind, making these opportunity deserts.

Policies (p. LU-18) ADDED

LU-A.1. Designate a hierarchy of village sites for citywide implementation that promotes a sustainable land use pattern and progress towards climate goals and greenhouse gas emission reductions identified in the Climate Action Plan.

c. Designate Urban Village Centers that cluster more intensive employment, residential, and regional and subregional commercial uses in order to maximize walkability, support transit, and promote the vitality of broader Subregional Employment Areas and the city.

This hierarchy needs to emphasize creating compact development near viable transit that provides access to high-quality job centers. It is unrealistic to plan to densify the entire city.

p. LU-19 ADDED

LU-A.7. Consider higher densities/intensities in village areas to support the production of new homes that are affordable to people of all incomes.

Density must be appropriately scoped to the expected buildout of the community. Overzoning unnecessarily drives up land prices and hence resulting rents. Coupling overzoning with unrealistic removing of parking requirements creates a highrise surrounded by a zone of exclusion to the next project, which must be far enough away to similarly absorb on-street parking. Finally, disconnected development hinders the creation of coherent commercial districts that would promote walkability.

p. LU-20

LU-A.8 ADDED

d. Evaluate the quality of existing public facilities and the potential to expand these facilities to support future growth.

e. Engage public agencies for facility planning efforts (refer to Public Facilities, Services and Safety Element).

Current policies that minimize or eliminate development fees ensure that there will be insufficient revenue to meet these goals.

LU-A.11. Robust policies for historic preservation and adaptive reuse are necessary to maintain or enhance Main Street character.

Previous LU-A.11 DELETED

~~LU A.11. Design and evaluate mixed-use village projects based on the design goals and policies contained in the Urban Design Element.~~

Objective design standards should be considered a critical part of San Diego's planning rather than an inconvenience to developers that should be gotten rid of.

LU-21 B. General Plan Land Use Categories (AMENDED)

Goals

- Land use categories and designations consistent with City of Villages strategy.
- Land use categories and designations that ~~remain consistent with~~ provide consistency between the General Plan ~~Land Use Categories as~~, community plans ~~are updated and/or amended~~, and the City's climate goals set forth in the Climate Action Plan.

San Diego's zoned housing capacity is dwarfed by its bonus incentives in commercial/multi-family and single-family zones. Because these bonus programs override community plans, the resulting developments create infill sprawl by pushing development away from transit and separating activities.

p. LU-22 Policies

Rather than relying on densities (du/acre), the city should define buildings by height limits, angle planes, floor area ratios, setbacks, and other form-based codes. This would give developers the flexibility to meet local community needs consistent with the scale of the surrounding buildings.

p. LU-46 Land Use Plan Amendment Policies

Add policy that Community Plan Updates (CPUs) should be zoned to no more than a 2x ratio of target density. Successful Transit Oriented Development (TOD) requires horizontal development along transit corridors, not isolated residential towers that can't provide enough ground floor retail and other activities to meet residents' daily needs.

Given that Blueprint SD introduces new extremely high density zones (218 du/acre and 290 du/acre), it is important that these only be deployed where they match the expectations for future growth.

p. LU-58

strengthen language to Affirmatively Further Fair Housing by adding underlined language to the second paragraph:

"An important program that supports the development of affordable housing across the city is the Inclusionary Housing Ordinance (adopted in 2003 and amended in 2022). The Inclusionary Housing Ordinance requires all new residential developments of five units or more within the Coastal Overlay Zone and ten units or more outside of the Coastal Overlay Zone to provide affordable housing through a variety of methods. The required affordable homes are either provided on the same site as the market-rate units, on a different site within the same community planning area, or through developer payment of in-lieu fees which are deposited into the Affordable Housing Trust Fund. Affordable developments derived from developer payment of in-lieu fees must be built only in tracts identified as high resource or highest resource areas for the year in which they are approved by the city in accordance with the California Tax Credit Allocation Committee and the California Department of Housing and Community Development (CTCAC/HCD) Opportunity Map ensuring the city meets AFFH goals. No affordable developments derived from payment of in-lieu fees deposited into the Affordable Housing Trust Fund may be used to construct any new affordable units in low resource, moderate resource, or high poverty & segregated areas as defined by the CTCAC/HCD Opportunity Map."

Note the following reflection from Dr. Matthew Desmond, from his 2023 book, *Poverty, By America*: "By deconcentrating poverty in schools and communities, integration blunts its sting. Simply moving poor families to high-opportunity neighborhoods, without doing anything to increase their incomes, improves their lives tremendously. (pp. 161)."

Accordingly, San Diego should remain committed to making communities more inclusive, including building new income-restricted projects in high and highest resource areas.

Mobility Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

Transit usage depends on high population density to support the concentration of activities at transit destinations that make transit usage convenient and efficient. Because the population of San Diego is so spread out, there is no amount of service that will turn most of San Diego’s drivers into riders. San Diego’s transit-oriented development plans can only succeed by concentrating development around high quality transit lines, particularly adjacent to trolley lines.

Automobile suburbs – most of San Diego – will remain automobile suburbs, particularly if new development is randomly spread around the city instead of intentionally concentrated near high-quality transit that has convenient and competitive access to job centers.

The Village Propensity Map for south of I-8 communities is based on long outdated transit patterns that took residents in the 1930s and 1940s to the primary job centers of downtown and Midway. Further, the model used to create the map presumes that everyone that lives near transit will take transit. The model then simulates that behavior without accounting for how residents will be motivated to give up automobiles and instead use a transit system that is largely rigid, impractical, inconvenient transit. The rolling hills and interconnected canyons which are characteristic of San Diego makes transportation via the automobile a “must” for the vast majority of San Diego families and the City’s aging population.

DETAILED COMMENTS

p. ME-3 (amended):

[The Mobility Element contains policies that will help walking/rolling, bicycling, and shared mobility devices...](#)

The association of “rolling” with “walking” assumes that these are equivalent needs and forms of mobility. In particular, this mis-association fails to account for inclines, extended stairways, and conditions or absences of sidewalks.

p. ME-3 (added):

[To attain equity, the City acknowledges the need to engage communities of concern and understand where disparities exist and identify ways to address those disparities based on access to opportunity during the planning process. The confluence of transportation and land use polices can be used as a tool to address historic inequities in San Diego by prioritizing access to social and economic opportunities, such as jobs, affordable homes, healthy food, education, healthcare, and recreation, particularly in areas with the greatest needs. With the highest need to equalize the playing field and connect people to more resources through mobility, the transportation system should also include multi-modal options that are safe, affordable, reliant, enjoyable and easy to use.](#)

The starting point needs to be an analysis of the current transit system, including the development of transparent metrics for transit efficacy, which is particularly important because the Planning Department's own data clearly demonstrates that the areas with the greatest "transit richness" are also the areas of least economic and social opportunity. This is an artifact of transit routes in the areas of greatest needs being historically structured around downtown San Diego as the primary job center for San Diego.

The Climate Equity Index (see Glossary) includes a factor for proximity to transit but does not record average commute times for residents using transit and the quality of jobs that those commutes provide.

Further, Blueprint SD focuses on getting residents to job rich areas rather than presenting ideas for how to improve employment opportunities in areas of the greatest need. The city needs to do a lot more community outreach and economic analysis to enhance the Economic Development Element of Blueprint SD.

p. ME-5 Mobility system concept from the Kearny Mesa Community Plan

What street is this being applied to? It would require a massively wide street to provide all of the mobility and public space amenities depicted. We need realistic strategies for our actual streets, including deciding on which amenities should be given priority to others based on local community needs.

p. ME-8 Figure ME-1B Transit Land Use Connections with Village Propensity

To make this an effective planning tool, there needs to be an overlay of travel patterns during the day (flows to and from job centers in the morning and evening, shopping and entertainment destinations after hours).

This map fails as a planning tool in two ways:

1. It shows high in the mid-city area (University Avenue and El Cajon Boulevard). This is interpreted as this area being a prime target for housing development. However, this area has a high concentration of poverty and low economic opportunities. Transit in mid-city is a vestige of the early to mid 1900s, when San Diego's primary job center was downtown and buses and trolleys took people to where those jobs were.
2. The map shows low density in the geographic center of the City (Kearney Mesa, Clairemont Mesa, and Mira Mesa), which are areas near high-quality job centers.

In short, the Village Propensity map proposes pushing more housing into areas with low economic opportunity away from job centers, while avoiding the most job-rich areas of the city. As demonstrated by this map, San Diego's transit and development planning remains stuck in nostalgia for the "streetcar suburbs" of the 1930s instead of recognizing the automobile-driven northward shift of the city.

p. ME-9 Relationship Between Land Use and Transportation Planning

San Diego's infill planning policies fail to appreciate that randomly adding density to suburban sprawl perpetuates suburban sprawl. We would need roughly 5 times San Diego's current population density to produce the levels of transit usage that are imagined in San Diego's Climate Action Plan. Accepting the reality that San Diego is only projected to grow 10% or less, we need to identify a limited number of specific locations or transit corridors that make sense to densify, instead of relying on overly expansive Sustainable Development Areas (SDAs) to justify upzoning almost all of our commercial and multi-family areas and over half of our single-family neighborhoods. Given that transit adoption is driven by population density, especially at the destination end of the trip, the smaller our transit-oriented development footprint is, the more likely it is to succeed.

p. ME-9 Prioritizing Sustainable Modes (added):

Shifting from a car-centric transportation system begins with establishing a roadway mobility priority system (also referred to as mobility loading prioritization). This system prioritizes the safety of the most vulnerable users because they are most at risk. People walking/rolling are the top priority on every street, followed by people who ride a bike and use micromobility, then transit riders. The priority system concludes with people using shared, commercial, and personal electric or alternative fuel vehicles (both for personal trips or for the delivery of goods). As these priority modes have historically encountered underinvestment, rebalancing the City's transportation network to better allocate roadway space, amenities, and connections for these modes will address the needs of their users and make them a more convenient choice for how people move around the City.

Looking at the Climate Action Plan (CAP), even the most optimistic scenario is that at least half of all trips across the city will be diverted from automobiles.

This means that any meaningful gains in GHG reduction will come from transition to low-emission or fully electric vehicles.

p. ME-10 adds language that:

Previous land use decisions emphasized suburban development resulting in longer commutes between homes and jobs. Creating a sustainable framework for growth to support current and future San Diegans requires close coordination between land use changes and transportation planning.

The City of Villages strategy calls for increasing homes and jobs in village areas that are connected to the regional transit system and future transit investments. Homes and jobs adjacent to high-frequency transit helps make transit convenient for more people and allows for a more cost-effective expansion of transit services. Transit-oriented development involves more than just building homes near transit; it is also a mix of land uses that provide opportunities for people to live near their jobs, and helps support the use of neighborhood shops and services. Convenient access to places and resources

should also be complemented with walkable/rollable and bikeable public spaces that reduce the need to drive and are supported by a balanced transportation system. Such a growth strategy provides a sustainable framework that enables San Diegans to accomplish everyday tasks locally and more efficiently further improving the quality of life in the City.

The Village Propensity Map makes a false association between jobs and transit. Regardless, the reality is that cars will become less polluting. Point-to-point travel will continue to be vastly more time-efficient for most San Diegans. San Diego might consider how to replicate this with autonomous vehicles and on-demand micro-transit solutions, but large-capacity fixed route systems are unlikely to achieve the goals that proponents have set for them.

The implication that people are going to move every time they change jobs is not realistic. However, housing should be located in areas that have efficient access to job-rich areas, either by transit or by reduced driving distances.

Transit-oriented development needs to be in close proximity to transit. Best practices are within 1/4 mile of bus stops and 1/2 of rail. Given the limited number of additional future residents, the smaller the identified footprint of future transit-oriented development, the more likely it is to succeed. To this end, San Diego should not only reduce the distance to transit (1 mile) of the Sustainable Development Areas (SDAs) to 1/2 mile walking distance, but it should also restrict the SDA map to existing and not unfunded future transit stops.

By zoning for scattered highrises. San Diego is failing to produce the density of commercial activity that is necessary to “accomplish everyday tasks locally.”

The Transit/Land Use Connections Transit Map (Figure ME-1B)

p. ME-11 Relationship with Other Plans and Programs

Given that San Diego’s population projections continued to be revised downward, and there is insufficient identified funding for a massive expansion to San Diego’s transportation, priority should be given to existing transit. In particular, San Diego’s Sustainable Development Area and Transit Priority Area maps should be based on the Regional Transportation Improvement Program (RTIP) and not the current reliance on the Regional Transportation Plan (RTP). We shouldn’t be basing land use decisions on a 2050 transit network wishlist.

Further, the one-mile walking distance for the Sustainable Development Area (SDA) is inconsistent with federal funding guidelines for transit-oriented development funding (1/4 to 1/2 mile walking distance).

Further comments on Village Propensity Map

San Diego’s planning is based on a failure to understand that our residential footprint is largely automobile suburbs. It will be impossible to substantially alter this citywide. Instead, we need to identify a limited number of specific locations or transit corridors that make sense to densify, instead of relying on overly expansive Sustainable Development Areas (SDAs) to justify upzoning almost all of our

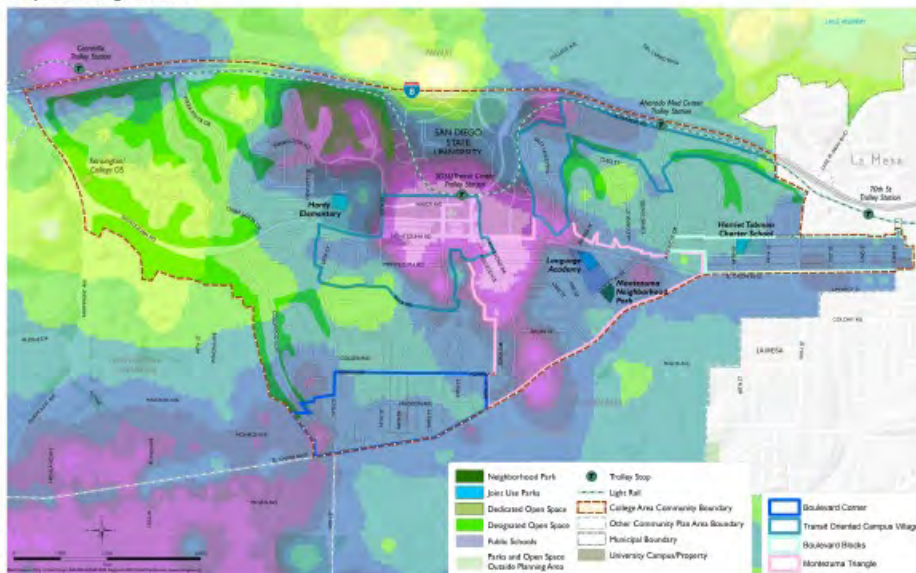
commercial and multi-family areas and over half of our single-family neighborhoods. Given that transit adoption is driven by population density, especially at the destination end of the trip, the smaller our transit-oriented development footprint, the more likely it is to succeed.

The underlying modeling technology of San Diego’s transit propensity maps is in flux. Blueprint SD is based on the SANDAG Activity-Based Model (ABM) specification¹. Specifically, Blueprint SD relies on SANDAG’s ABM2+ model, which is based on the CT-RAMP (Coordinated Travel Regional Activity-Based Modeling Platform) family of Activity-Based Models. SANDAG is replacing CT-RAMP models with a newer modeling capability call ActivitySim, and Blueprint SD will also need to be updated to utilize the newer and presumably higher fidelity simulations made possible by ActivitySim.

Further, it is important to understand that these Activity-Based Models rely heavily on the assumptions of household composition, community demographics, economic choices, and available modes of transit. The models are particularly sensitive to planned transit, and San Diego’s experience dictates that our near-term transit planning (RTIP) often takes many more years to be built, and our long-term transit plans (RTP) change every few years and in many cases never materialize.

Finally, it is worth asking whether SANDAG’s current ABM approach is the best way to assess transit opportunities. Current ABM models rely heavily on Census data, surveys, and other demographic studies to set up the conditions of the simulation. Rather than ask people how they use transit, a much better approach would be for their cellular devices to simply tell us. Because it wouldn’t rely on broad categorizations of individuals, trips, and destinations, the results would be intrinsically more accurate and less subject to skewed assumptions. As an example, the Blueprint SD map of the college area most likely reflects three different types of transit modalities: students going to and from SDSU, commuters using the trolley, and local trips on El Cajon Boulevard. Unfortunately, the heat map fails to elucidate these differences, resulting in a proposed infill development pattern that prioritizes student housing throughout the College Area over other residential and commercial needs of the community.

Blueprint San Diego Scenario



Ref 1: SANDAG Travel Demand Model Documentation:

https://www.sdforward.com/pdfs/RP_final/AppendixT-SANDAGTravelDemandModelDocumentation.pdf

ME-14 A. Walkable Communities

Recognizes that the appropriate extent of walkability is 1/2 mile, not the unrealistic and excessive standard of 1 mile that has been adopted by San Diego for the SDA. Less is more.

In addition to the stated attributes, it is important that sidewalks provide a continuous walking path.

p. ME-15 ff Policies

Need tree-lined sidewalks that are wide enough to support the local pedestrian density.

In general sidewalks are given a limited amount of attention relative to other forms of mobility.

p. ME-19 Added

ME-A.10. Create walkable destinations equitably across the City by increasing opportunities for placemaking and community gathering spaces, facilitating outdoor dining, and allowing for the creation of more designated space for active transportation.

Form-based code, including preserving historic community centers, is key to place-making.

ME-A.10 How does the city intend to balance outdoor dining while maintaining adequate sidewalk width for the expected pedestrian traffic?

p. ME-29 Bicycle Trail on Map ME-2

Remove the trail from this map that shows a "Proposed Bikeway Facility" connecting Regents Road from the north and south sides over (or through) Rose Canyon. The City deleted the Regents Road extension across Rose Canyon in 2016, removing the project from the University Community Plan. Hence, a bikeway along this non-existent road is not feasible and should be deleted from Figure ME-2.

p. ME-30 Bicycling Policies

Bike lanes should be located off main streets, where feasible and sensible. This should be done to improve safety, without compromising convenient access to destinations. This should also be considered to reduce conflicts between cars, bikes, and people crossing the bike lane to enter parklets (restaurant seating).

Urban Design Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

A thoughtful, comprehensive, and self-adapting Urban Design element is necessary to clearly define spatial relationships between buildings and surrounding land uses. It is critical to guide future growth that is not only compatible with its surrounding buildings and the public realm, but complements the implementation of the desired densities identified in Blueprint SD.

Bonus density incentives, particularly Complete Communities Housing Solutions, override deliberate planning without considerations of the local conditions of the project. To mitigate these effects and set proper expectations for both developers and residents, San Diego should consider form-based codes that ensure good outcomes, including angle planes (relative both to neighboring buildings and street widths, with 45 degrees being the preferred angle), setbacks, objective design standards, floor area ratios (FARs), and other public-facing aspects of the development.

Angle planes and upper story setbacks are particularly important because the Land Use Element introduces extremely high density zones (218 du/acre and 290 du/acre). Angle planes ensure that projects built in these zones are appropriate in height to their surroundings. Angle planes should not only be relative to other buildings, but also the street widths. (A typical guideline is one-to-one, so that a 50 ft wide street would have a height limit of 50 feet.) This prevents streets from becoming tunnels as they are built out. These restrictions should be applied to projects built under base density and bonus density programs, especially Complete Communities Housing Solutions, which has Floor Area Ratio (FAR) allowances that vastly exceed base densities in areas where these projects are being built.

Historic preservation should be rightfully considered as form-based code that naturally provides compatibility with neighboring buildings. Historic preservation is also a key method for achieving the City of Villages' place-making goals. Other benefits are that it reduces construction waste (25% of San Diego's landfill) and supports higher paying construction jobs.

The City has been moving towards allowing as many projects as possible to be processed ministerially. Ministerial projects have no requirement for public notice, no public hearings, no right of appeal, and no requirement to follow Community Plans. Further, ministerial approvals give Development Services full authority to interpret ambiguous land development codes without public or Council input. Blueprint SD should include policies to require discretionary processing for projects that exceed certain density or size thresholds.

DETAILED COMMENTS

p. UD-4 (added):

[While certain aspects of design may be subjective, there are design principles that can be implemented to promote a positive identity across San Diego's various communities. To effectively implement a citywide urban design strategy requires the establishment of objective urban design guidance. Objective design criteria are measurable, verifiable,](#)

[and involve no personal or subjective judgment by public officials and/or decision-makers. The Urban Design Element provides high-level guidance to establish an overall urban design strategy.](#)

Previous drafts included the concluding phrase “which is intended to be implemented through objective design criteria in community plans, zoning regulations, and other related efforts.” The elimination of this phrase backs away from the commitment to good design in community planning.

Objective design standards are critically important in a permitting regime where the majority of projects are ministerial. Unfortunately, past code changes and Development Services permitting practices have eschewed objective design standards and fundamental principles of form-based code. Adherence to these principles is necessary to create expectations of infill projects for both developers and affected nearby residents. City planning should be creating the molds into which developers pour their projects, not deregulating San Diego’s land use and letting developers build whatever they want, wherever they want.

p. UD-4 – UD-5:

- (amended) [Direct growth into transit-oriented mixed-use and commercial areas where a high level of activity already exists or can potentially be realized; and](#)
- (added) [A sense of place, where community members can enjoy time outside their homes and jobs with each other.](#)
- (removed) ~~[Preserve stable residential neighborhoods.](#)~~

The amendments to prioritize transit/commercial corridors and the enhancement of public spaces are key priorities.

While the reference to stable neighborhoods has been removed, likely due to it being potentially misconstrued as preventing development in single-family neighborhoods, it is nonetheless critical that there be expectations of development of matching scale and conformance to objective design standards to ensure the compatibility of infill housing with their surrounding buildings. Rigorous code enforcement is equally critical in this regard, as lax enforcement has had a corrosive effect on public trust, with a resulting overall negative effect on housing production consistent with this proposed Urban Design Element.

p. UD-5 – UD-6:

[The Urban Design Element addresses urban form and design through policies aimed at respecting our natural environment, preserving open space systems and targeting new growth into compact villages. Urban form and how it functions becomes increasingly important as changes in density and intensity occur over time, as San Diego evolves. The urban design principles established in this element are intended to help achieve an identity for the City as a whole, while encompassing its physical, social and cultural](#)

diversity. A higher overall quality of urban design is another fundamental goal. Urban design applies at multiple levels from citywide to community to neighborhood and ultimately to individual projects.

Urban design is a process to foster quality in the built and natural environment as the City changes.

Urban Design Element policies help support and implement land use and transportation decisions, encourage economic revitalization, and improve the quality of life in San Diego. Ultimately, the General Plan's Urban Design Element influences the implementation of all elements of the General Plan and community plans as it establishes goals and policies for the pattern and scale of development and the character of the built environment. The urban design policies will be implemented through objective design criteria, including area-specific community plan recommendations.

These are principles that should have broad agreement across residents and developers; however, the reality is that to date San Diego has fallen far short of these goals in pursuing housing unit counts at the expense of other public priorities.

p. UD-6:

Goals

- A built environment that respects San Diego's natural environment and climate.
- An improved quality of life through safe and enjoyable neighborhoods and public spaces.
- A pattern and scale of development that provides visual diversity, choice of lifestyle, opportunities for social interaction, and that respects and enhances community character and context.
- A City with distinctive districts, communities, neighborhoods, and village centers where people gather and interact outside of their homes and jobs.
- Maintenance of historic resources that serve as landmarks and contribute to the City's identity.
- Utilization of landscape as an important aesthetic and unifying element throughout the City.

Again, these are widely accepted goals, but the city has not been adhering to them. The key requirement is that ongoing development is consistent with the scale and design of surrounding buildings, that standards for future development are objective and provide clear expectations for developers and community residents, and that increased density due to infill development brings benefits to communities that outweigh potential negative side effects.

See below for notes on historic resources.

p. UD-7-UD-8

The reference to the Urban Design policies being “intended to influence project design, and to be used in the development review process” was removed. Striking this language implies that San Diego is not committed to Urban Design.

p. UD-10 Sustainable Development (amended)

Sidewalks and street canopy are a key element of walkable neighborhoods, but aren’t mentioned here. Form-based code is not just about the relationship of buildings to each other, but how buildings integrate with and enhance the public sphere.

p. UD-11 Building Design

What’s missing here are guidelines about scale and transition. Angle planes are critical – to reduce the feeling of urban canyons and to ensure air circulation, heights of buildings should be in proportion to street widths, and there should be guidelines for transitions between zones, potentially including provisions for adaptive height limits as areas evolve over time.

p. UD-14 Historic Character (Policy UD-A.7)

Part of what makes neighborhoods distinctive and welcoming is preservation and enhancement of their historic context. Other cities in Southern California have recognized this by developing adaptive reuse policies. See for example:

Los Angeles

https://planning.lacity.org/odocument/d39bf248-681f-4a63-aaf3-7829d25f273c/Citywide_ARO_Draft_Ordinance_Strikeout_May_2023.pdf

Long Beach

https://www.longbeach.gov/globalassets/lbds/media-library/documents/publications/lbds-publications/341586_adaptive-reuse-standards_lr_r3

Santa Ana

<http://www.sohosandiego.org/enews/images/0522santaanaadaptivereuseordandmap.pdf>

Adaptive reuse, which can be applied to both designated and non-designated historic resources, enhances historic resources, decreases landfill, and, as naturally occurring affordable housing, provides more affordable housing, as can be seen from a comparison of rents and condominiums in downtown Los Angeles, which has relied extensively on adaptive reuse, and downtown San Diego, which consists of mostly new high-rise construction.

Creating an adaptive reuse policy provides a framework in which preservationists and developers can work together, setting clear common expectations that avoid litigation and keep projects on schedule.

Beyond historic designation, objective design standards are critical to maintaining coherent neighborhoods as they go through redevelopment. These can be created in collaboration between community planning groups and the Planning Department. More rigorous standards might be produced by historic districts, while still allowing for change over time.

p. UD-12 Landscape

Where possible, community plans should broaden sidewalks to allow planting of shade trees, which will create more inviting, walkable streets, reduce heat island effects, and absorb runoff.

p. UD-14 Streets

Consideration should be given in community plans to reconfigure commercial side streets to increase outdoor public spaces, such as for dining. This would help to create a neighborhood core and generate economic activity as a destination. If complete removal of automobiles is not possible, public space could be recovered by turning two-way streets into one-way streets.

p. UD-15 Structured Parking

Even as parking is being separated from other uses, particularly housing, it is going to take decades to create neighborhoods that are less automobile dependent. Parking structures provide a transitional parking solution that can be combined with adjacent uses, such as rooftop solar generation, electric charging stations, secure delivery lockers for online shopping, storage, and other uses that might not otherwise be available to a renter.

p. UD-17 Surface Parking (Policy UD-A.12)

The introductory sentence should acknowledge that an oversupply of parking is critical for certain community assets, such as supermarkets and drug stores.

Outside of these necessary uses, surface parking should be discouraged in the highest zoned areas, particularly along transit and commercial corridors. Various mechanisms have been proposed to spur redevelopment of vacant lots, surface parking, and other underutilized parcels, including vacancy taxes, land taxes, split roll taxes, and fees on unused floor area ratio (FAR). The city of San Diego should be

exploring these options as an alternative to upzoning, which tends to increase property values and resulting housing costs.

p. UD-19 Mixed-Use Villages and Commercial Areas:

The City of Villages strategy identifies a village as a mixed-use center of a community where residential, commercial, employment, and civic uses are present. The intent is that a high quality of urban design will achieve the maximum possible integration of uses and activities connected to the surrounding community fabric and the transit system. Villages will be compact and walkable, with inviting streets and public spaces for community events. Villages will serve as focal points for public gatherings as a result of their outstanding public spaces. In addition to compact residences and retail establishments, villages will contain public spaces that include plazas, public art, cultural amenities, transit centers, enhanced streetscapes, urban trailheads, parks and pocket parks. Publicly-oriented buildings including civic buildings and monuments, public facilities and services, and social services will also contribute to villages as activity centers.

The City of Villages is intended to realize the mutual community benefits of adding density. When done well, increasing density will have broad popular support within a community. If done without regard to the urban design guidelines in the City of Villages, added density will be divisive because negative consequences (infrastructure, noise, parking, heat islands, and traffic) will not be mitigated by positive alternatives (walkability, street canopy, community).

Methodologies to implement City of Villages in a community plan update include:

- Consider reconfiguring side streets to create quieter, human scale public spaces, such as outdoor dining and pocket parks.
- Consider converting larger (big box) shopping centers into community plazas, which are lacking throughout San Diego today outside of shopping malls.
- Develop anti-displacement measures for small businesses, which give neighborhoods their character and are most vulnerable to temporary closure or relocation of their businesses and challenges to get business loans to restart their businesses once redevelopment is completed.
- Define meeting places for local residents, thereby strengthening the community fabric, including joining communities across major thoroughfares.
- Create attractive and novel destinations and experiences for outside visitors, thereby driving economic development.

p. UD-24:

Where feasible, use small buildings in key locations to create a human scale environment in large retail centers. Incorporate separate individual main entrances directly leading to the outside from individual stores.

Adaptive reuse could play a key role in creating the human scale environment to connect the public realm to new developments.

p. UD-27 Distinctive and Inclusive Neighborhoods and Residential Design

Discussion

In conjunction with the General Urban Design Goals identified in the previous section, the following policies are intended to provide further guidance for ~~maintaining our distinctive neighborhoods and~~ achieving high-quality residential design. As the City grows, new development, whether it is in the form of infill, redevelopment, or first-time development, is critical to meeting the needs for the people that live in these homes. ~~Consciously designed projects~~New development. ~~The design and quality of infill housing is critical to ensuring that new housing fits into our existing neighborhoods. Preserving neighborhood character does not mean maintaining the status quo. Sometimes change is welcome, as private and public investment can contribute to the beauty, vitality, and functionality of a neighborhood. However, new development, whether it is in the form of infill, redevelopment, or first-time development, All projects~~Development should contribute to the ~~creation and preservation of neighborhood character and~~ creation of a sense of place aligned with the City's overall Urban Design Strategy and promote a positive and inclusive community identity.

San Diego's distinctive neighborhoods are a great asset to the City. Some neighborhoods date back to the early days of San Diego's history and a few are still emerging, but each has elements that set it apart from the others and establish its identity. Many of San Diego's neighborhoods are the product of small incremental parcelizations and development over a long period of time. Neighborhood character is defined in part by certain physical qualities that repeat throughout neighborhoods, such as landscape and massing of buildings, colors, and materials. The character of a neighborhood or community is also defined by factors including topography and natural features, street layout and streetscape, and landmarks and civic land uses.

Residential housing types include ~~conventional~~ single-home family detached homes and multiple family home development, including , small-lot single-family homes, rowhomes, townhouseshomes, duplex and triplex dwellingshomes, and a wide variety of apartment and condominium unitshomes. While densities, unit mix, and design parameters will vary based on individual community plans recommendations, there are overall policies that are applicable citywide.

The residential design policies are intended to foster the development of high quality housing homes that meet the needs of San Diego's populations and that becomes an integrated part of the larger inclusive neighborhood and community. ~~The distinctive neighborhoods policies strive to preserve the desirable distinctive qualities of existing neighborhoods while~~ These policies strive to encourage encouraging a coherent image of the City as a whole. These policies are intended to be implemented through objective design criteria as a part of community plans, zoning regulations, and other related efforts. ~~It is intended that these general policies be supplemented with site-specific guidance in community plans.~~

Policies

Residential Design

UD-C.1. Recognize that the quality of a neighborhood is linked to the overall quality of the built environment. Projects should not be viewed singularly, but viewed as part of the larger neighborhood or community plan area in which they are located for design continuity and compatibility.

[previous (a) deleted]

- a. Design new construction to respect the pedestrian orientation of neighborhoods.
- b. Provide innovative designs for a variety of housing types to meet the needs of the population.
- c. Consider appropriate transitions between newer and older development. Take into consideration factors such as building bulk and mass, existing points of ingress/egress, and the potential for shadow casting.

UD-C.2. Achieve a mix of housing types within single developments (see also Land Use and Community Planning Element, ~~Section H~~, and Housing Element).

- a. Incorporate a variety of homeunit types in ~~multifamily~~ multi-home projects.
- b. Incorporate a variety of ~~single-family~~ housing types in single-home developmentfamily projects/ subdivisions that enhance the existing community.
- c. Provide transitions of scale between higher-density and lower-density development based on lot size, physical constraints, and other site conditions ~~and lower-density neighborhoods.~~
- d. Identify sites for revitalization and additional housing opportunities in neighborhoods.

Subdivisions

UD-C.3. Design subdivisions to respect the existing lot pattern established within neighborhoods to maintain community character.

- a. Create lot divisions that respect the existing pattern of development for neighborhood continuity and compatibility.
- b. Design lot divisions to have a portion of each created lot in areas of less than 25 percent gradient.

There is a lot to process in these changes, but the overall implication is that infill housing should not be constrained by neighborhood character. In the end, this attitude is short-sided and counterproductive.

Insertion of Policy UD-C.c (shadow casting) is welcome, especially since it does not appear to currently factor into permitting decisions, particularly for Complete Communities Housing Solutions projects, which vastly exceed the height restrictions of existing zoning.

Economic Prosperity Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

Blueprint SD correctly identifies that economic growth and opportunity is unevenly distributed across San Diego, but presents no concrete, actionable proposals for how to address this. There needs to be a plan for economic development in south of I-8 communities.

The areas south of I-8, and other low resource areas, need to become economically balanced with the rest of the city. Development in these areas needs to focus on building moderate and market rate housing and employment areas to draw up the average incomes in the areas. Concentration on improvements in education is also needed in these areas.

Low income housing added to these areas will compound inequity problems, including low economic opportunity, low education, lack of recreation opportunities, lack of grocery stores, pharmacies, healthcare facilities.

For the envisioned balanced villages, development in the high resource areas needs to meet the city's target of a minimum of 10% onsite inclusionary housing, so people with low incomes are able to live near where they work, get better educations and have amenities available in close proximity to their homes.

DETAILED COMMENTS

p. EP-5:

Despite the economic growth that has occurred over the last several years, economic prosperity has not been evenly distributed in San Diego. National and local economic trends are potentially creating a skewed economy (fewer middle-income jobs, more high-quality professional jobs, and many low-wage services jobs), exacerbating income, social, and spatial disparities.

It is unclear how Blueprint SD is going to address this issue, given that most of San Diego's high paying jobs in tech and life sciences are in the northern part of the city, and south of I-8 communities, particularly in Council districts 4, 8, and 9, do not have effective non-automotive transportation to job-rich areas. The mass transit lines in these districts were designed when downtown San Diego was the dominant job center, and San Diego's topography and overall low population density have precluded the evolution of modern efficient transit.

To remedy this situation, San Diego needs economic development targeted to these neighborhoods. Part of this can be triggered by community-centering mixed-use development, but there is also a need for high value products and services, either through clean additive manufacturing (3D printing), green technology, fashion and design, media, electrical vehicle conversion, upcycling, and similar businesses. Further, encouraging the development of co-working spaces would increase employment in areas with

the greatest needs, reduce traffic congestion, and allow for a flexible, hybrid compromise between working remotely and working at a corporate headquarters.

p. EP-40:

The continuing growth of the production-sharing industry in Tijuana plays an important role in the region. San Diego-based companies offer critical support in terms of administration, logistics, transportation, research and development, shared manufacturing, warehousing, and distribution. However, the industry is under competitive pressure from other offshore production centers where the cost of labor is comparatively cheaper. To counter this effect, Baja California is developing other sectors such as the automobile, pharmaceutical, and technology industries, and defense work where proximity to the market is a significant factor.

The Port of San Diego represents the economic ideal of industrial diversification as an economic motivator for the entire region. The San Diego region operates cargo facilities that support trade and manufacturing, as well as non-manufacturing activities, such as maritime commerce, goods movement, retail, boat charters, marina services, bay cruises, sport and commercial fishing, yacht sales, lodging, and the military. The waterfront supports a significant amount of both civilian and military workers. Based on the economic importance of the waterfront to the San Diego region, preserving and protecting San Diego's waterfront business activities is critical in providing a diverse workforce and regional economic vitality.

While transborder trade and production sharing has potential to address the need for diversification of economic opportunity in areas of greatest need, we should also look for economic development strategies that can be implemented within the City of San Diego and don't depend on cross border trade. Future-oriented businesses, such as were mentioned in the previous comment, would bring resiliency, creativity, and innovation to areas of greatest needs.

p. EP-45 Economic Reporting EP-L.1 – EP-L.5

Economic reporting and updated policy-making should specifically track and develop policies for economic development in areas of greatest needs.

Public Facilities, Services and Safety Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

The City should re-commit to providing adequate public facilities concurrent with development. Given that San Diego has reduced or eliminated fees on much of its development, it is unclear where the city will get funding for these public facilities.

San Diego should not be promoting development in high fire hazard zones, as it does with the Bonus Accessory Dwelling Unit program, Complete Communities Housing Solutions, and other programs based on Sustainable Development Areas (SDAs), which do not exclude Very High Fire Hazard Severity Zones from high-density development.

When community plan updates occur, include an analysis of Land Value Capture, as a way to provide revenue for needed public facilities and community benefits.

DETAILED COMMENTS

p. PF-4

The terms “urbanized,” “planned urbanizing,” and “future urbanizing” obscure the fact that most of the so-called urbanized areas are persistently suburbanized areas, and, because of the limited future growth in the city’s population (roughly 200,000 new residents between now and 2050), San Diego will only be able to reach true urbanized densities (20 people or more per acre) in selected and intentional target areas.

p. PF-7 Infrastructure and Public Spaces Policies

Add the following policy:

"When community plan updates occur, include an analysis of Land Value Capture, as a way to provide revenue for needed public facilities and community benefits."

Funding is essential to development and the additional infrastructure and public facilities that will be needed.

The policies in the proposed Blueprint project would allow significantly more housing units, commercial development, and public investments. The City should utilize Land Value Capture (LVC) tools to ensure that increases in property value resulting from land use changes are shared with the public.

This important and much needed revenue source would greatly contribute to ensuring well-functioning communities with affordable housing for all income levels, public infrastructure, safe mobility options for walking, biking and transit, open space, and excellent parks and recreation facilities.

D. Fire-Rescue

p. PF-19:

The topography and terrain throughout the City present considerable demands on fire-rescue services under various conditions and can also affect response times. Future infill development in very high fire hazard severity zones will place an increasing demand on the capabilities of fire-rescue resources to deliver an acceptable level of emergency service.

p. PF-21

The very high fire hazard severity zones are located throughout the City. Inclusion within these zones is based on five factors: density of vegetation; slope severity; five minute fire department response time; road class/proximity, and proximity to fire hydrants and CAL FIRE's vegetation cover and fire behavior/fuel spread model. Based on these factors, the zone encompasses a large portion of the City including most land use designations, major freeways and roads, various structures and major utilities and essential public facilities.

As noted above, much of the city lies within Very High Fire Hazard Severity Zones, and San Diego has elected not to prohibit new dense development in these zones. As a compromise, the city should at least consider reducing allowed densities in Very High Fire Hazard Severity Zones, particularly adjacent to open space areas.

p. PF-54 Policies

Consider libraries as a ground floor use of mixed use-development. This could potentially open up public land for parks, for example.

Recreation Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

The lower fees in the Parks Master Plan mean that there are fewer park funds overall. Almost every community in San Diego is park-deficient, and there isn't a clear plan to catch up. Recent community plan updates can't even meet the much lower bar set by the Parks Master Plan and its controversial points system. Clearly, we need new strategies for reaching our park goals.

The City should continue to prioritize converting surplus city-owned land in park-deficient communities into parks. Otherwise, because the City has eliminated its Planned District Ordinances (PDOs) that required developers to provide onsite outdoor space, the only choice the city has is to purchase land from private owners at prices inflated by the City's own actions.

Conservation Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

The vast majority of San Diego's residents rely on automobiles for daily activities. To change transportation choices, San Diego needs to intentionally focus density onto commercial and transit corridors rather than spreading it into San Diego's existing automobile-dependent suburbs.

One-quarter of all landfill in San Diego is construction waste. San Diego should be reducing this waste through adaptive reuse.

Heat island effects are increased by infill development that clear-cuts urban canopy. We should be planting more trees and not removing the ones we have.

San Diego's conservation efforts are undermined by land use policies, including Complete Communities Housing Solutions, Bonus ADUs, and SB 9, that are highly preferential to dense development along canyon and mesa rims in Very High Fire Hazard Severity Zones.

San Diego is being overconfident about its water-sufficiency. San Diego needs a contingency plan whereby if external water supplies are reduced or disrupted, San Diego can rely on reservoirs, Pure Water recycling, and desalinization. As was demonstrated by the recent flooding, as we lose permeable surfaces to infill development, we will experience more runoff flooding homes and going into sewers rather than being absorbed into the ground.

DETAILED COMMENTS

p. CE-9:

The City of Villages strategy focuses the City's growth into compact, mixed-use centers of various scales that are linked to the regional transit system, and preserves open space lands. This strategy creates opportunities for more convenient travel by transit, bicycles and foot, which will help reduce local contributions to greenhouse gas emissions that might otherwise occur by reducing the length and number of auto trips. Since the City of Villages strategy seeks to accommodate most of the City's growth needs through infill and redevelopment, it provides an alternative to lower density, auto-oriented development in the outlying areas of the City and region. Close coordination of land use and transportation planning are fundamental for establishing an urban form that integrates principles of sustainability.

This statement obscures the fact that purported urban infill is actually development in what were previously outlying areas of the City and which retain their original automobile dependency. To change transit choices, San Diego needs to intentionally focus density onto commercial and transit corridors rather than spreading it into San Diego's infill suburbs.

p. CE-10:

Buildings account for nearly half of the total energy used in the United States and represent a significant portion of the nation's consumption of energy and raw materials, and waste output.

Roughly one-quarter of all landfill in San Diego is construction waste. San Diego should be reducing this waste through adaptive reuse.

p. CE-11:

The design of commercial and residential developments is a significant factor in creating what is known as an "Urban Heat Island Effect." Heat islands form as cities replace natural land cover with dark-colored impermeable pavement for roads and parking lots; construct buildings that block natural cooling from wind; and otherwise collect and retain heat so much that a city can be up to ten degrees warmer than nearby open spaces.

Heat island effects are increased by infill development that clear-cuts urban canopy. We should be planting more trees, not ripping out the ones we have.

p. CE-14:

Develop policies that encourage and incentivize developers, homeowner associations, and other organizations to preserve, maintain and plant trees.

This statement is in contradiction to San Diego's ADU bonus density program and the proposed SB 10 implementation, which encourage clear-cutting properties to construct as many units as will fit on the lot.

p. CE-B.1:

Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.

This statement is contradicted by land use policies that are highly preferential to dense development along canyon and mesa rims in Very High Fire Hazard Severity Zones, including bonus ADUs, SB 9, and the proposed SB 10 implementation.

p. CE-25:

Increasing global temperatures are accelerating rates of sea level rise. In the 20th century, sea levels rose 0.71 feet in San Diego. By 2025, sea levels in San Diego may rise between 1.2 to 2.8 feet and by 3.6 to 10.2 feet by 2100 (California Coastal Commission, 2018). This range of sea level projections demonstrates the increasing uncertainty associated with estimating sea level rise in the long term, especially after 2050. Overall, coastal storms are projected to occur more frequently in the future, which will further exacerbate flooding and erosion along the coast.

Sea level rise is especially an important concern for the proposed redevelopment of the Midway area, yet it was ignored during the consideration of raising the height limit.

p. CE-30 D. Water Resources Management discussion

The City has no direct control over the imported water supply, but is a member agency of the San Diego County Water Authority (SDCWA), which is responsible for securing the region's imported water supply. Additional dedicated water supplies and increased water-use efficiency programs are needed for the region to support growth projections and industry needs. In response to imported water supply uncertainties, the City prepared a Long-Range Water Resources Plan, which defines a flexible 30-year strategy and includes evaluation tools for continued water resources planning.

In addition, the City is leading on a phased, multi-year program that will provide nearly half of San Diego's water supply locally by the end of 2035, through the Pure Water San Diego program. The Pure Water San Diego Program will use proven water purification technology to clean recycled water to produce safe, high-quality drinking water. Pure Water San Diego offers a cost-effective investment for San Diego's water needs and will provide a reliable, sustainable water supply.

San Diego needs a contingency plan whereby none of its water supply is imported, that is, access to external sources is completely cut off, and all water comes from Pure Water recycling or desalinization.

p. CE 31-32 Policies

Add an item (o.) to the effect of: "Develop plans for runoff collection into existing parkways, yards, and other potential mechanisms for groundwater replenishment."

As we lose permeable surfaces to infill development, we will experience more runoff going into sewers rather than the ground.

p. CE-36 Urban Runoff Management discussion

Open space areas and permeable surfaces are important to ensuring water quality. When storm water (or other urban water runoff) passes over these areas and surfaces, some of it is absorbed into the ground and cleansed by natural filtration processes.

Again, paving over residential neighborhoods reduces permeable surfaces and associated water absorption. We need to develop compensatory strategies for localized retention of rainwater, such as by diverting runoff into parkways.

p. CE-40 Urban Runoff Management policies:

Increase permeable areas for new trees and restore spaces that have been paved, focused in areas with the greatest needs.

Again, paving over residential neighborhoods reduces permeable surfaces and associated water absorption. San Diego needs to treat backyards and parkways as urban forest management rather than targets for massive densification.

p. CE-52 Urban Forestry policies

CE-J.a Identify City lands and spaces that need trees and identify ways to increase permeable areas for new trees, focused in areas with the greatest needs.

If it follows the pattern of ADU development, SB 10 is most likely to target areas with the greatest needs, with projects that remove permeable surfaces and urban canopy.

CE-J.3. Develop community plan street tree master plans during community plan updates in an effort to create a comprehensive citywide urban forest master plan (added – “see Conservation Element Policy CE-J.1”).

Noise Element

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

In order to reduce noise along transit and mixed-use corridors, design elements should include provisions for noise abatement, including adequate angle planes and setbacks to disperse ground noises.

DETAILED COMMENTS

p. NE-5 Table NE-1

Add the following to the list of noise sources.

- Helicopter
- Electric generator, including food truck
- Electric vehicle (car) at 25 feet at 65 mph

p. NE-9 Policies (Noise and Land Use)

Add a land use policy for angle planes and setbacks of high-density zones to disperse ground noise. Straight vertical walls reflect noise into offices and residents, as well as onto pedestrians and other people outdoors, creating an unhealthy environment.

p. NE-12 Motor Vehicle Traffic Noise

Noise can have a significant impact on quality of life. In addition to purely residential neighborhoods, consideration should be given to noise abatement on commercial and transit corridors, particularly areas where it is planned to add mixed-use, transit-oriented development. Consideration should also be given to how transition to electric vehicles will make street quieter.

p. NE-13 Policies (Motor Vehicle Traffic Noise)

NE-B.10: This policy should also include design standards for angle planes and upper story setbacks to mitigate environmental noise impact on residents.

p. NE-18] Policies (Helicopter Operations)

There is fudging of helicopter flight operations at the edge of influence zones.

p. NE-20 Policies (Commercial and Mixed-Use Activity Noise)

As recommended previously, add a policy for land use development using angle planes and upper story setbacks in order to dissipate and mitigate ground level noise.

Add a policy to encourage use of electric powered (vs. gas) generators, including for food trucks.

p. NE-23 Reducing the Source Noise

Add replacement of gas-powered vehicles, generators, and other gas-powered equipment with electric-powered alternatives as a means of reducing source noise.

p. NE-24 Interrupting/Separating the Noise Path

Add angle planes and upper-story setbacks in building design as a means of dissipating noise.

Glossary

Review the current City Planning draft element [here](#).

SUMMMARY RESPONSE

Given their relevance to the Land Use, Mobility, and Economic Prosperity Elements of Blueprint SD, the assumptions of Climate Equity Index (<https://www.sandiego.gov/climateequity>) should be reexamined to justify whether the Climate Equity Index is being properly calculated and truly assesses the circumstances of San Diego neighborhoods. This is particularly true with regard to the overweighting of archaic transit routes in south of I-8 communities, which do not take residents to high-quality job centers.

Regarding the definition of “Structurally Excluded Community,” a key structure of exclusion in San Diego is the overextension of Sustainable Development Areas (SDAs) and Transit Priority Areas (TPAs) as applied to the south of I-8 communities that constitute the areas of greatest needs. This results from the unwarranted extent of the SDA (up to 1 mile from transit), inclusion of future transit stops instead of limiting to existing transit, and failure to recognize that the transit routes in these areas are vestiges of the mid-1900s when downtown was the major job center for the city, and therefore do not meet the outcome-based standards of high-quality.

DETAILED COMMENTS

p. GL-7 (added) [Climate Equity Index](#)

[A tool to measure the level of access to opportunity residents have within a census tract and assess the degree of potential impact from climate change to these areas.](#)

Given their relevance to the Land Use, Mobility, and Economic Prosperity Elements of Blueprint SD, there are several components of the Climate Equity Index (<https://www.sandiego.gov/climateequity>) that warrant refinement:

Environmental Indicators

Fire Risk should include enhanced risk due to overlap of Sustainable Development Areas with very high fire hazard severity zones. San Diego has deemed that these zones should not be excluded from densification, but that does not mean that the risk from densification should not be accounted for.

Housing Indicators

Overcrowdedness does not specifically account for the number of bedrooms in a housing unit or the ages of the occupants (e.g., adults vs. children). Adjusting for the number of bedrooms would better measure the deficiency of 2 and 3 bedroom units, which are a critical target of the Housing Action Package 2.0 and other San Diego housing incentive programs.

p. GL-7 (added) Communities of Concern

A census tract that has been identified as having very low or low access to opportunity as identified in the San Diego Climate Equity Index.

Recommend reexamining the Climate Equity Index as detailed above.

p. GL-12 (removed) ~~Facilities Benefit Assessment (FBA)~~

~~Provides 100 percent of funds for public facilities projects which service a designated area of benefit and are identified in a Public Facilities Financing Plan (PFFP). The dollar amount of the assessment is based upon the cost of each public facility equitably distributed over a designated area of benefit in the community planning area. Liens are recorded with the County Assessor's Office.~~

Replaced by DIFs.

p. GL-20 (added) Multiple-Use Commercial Land Use

Provides for employment, shopping, services, recreation, and lodging needs of the residents of and visitors to San Diego. Recognizes the benefit of providing more than one use in the same location to reduce dependency on the automobile and encourages the provision of housing for all citizens of San Diego. Allows multiple uses in a mixed-use site plan or building that is commercially focused. Residential density ranges and allowed uses are further refined through community plans. This category of land use includes:

Neighborhood Commercial - Provides local convenience shopping, civic uses, and services serving an approximate three mile radius. Housing may be allowed within a mixed-use setting.

Community Commercial - Provides for shopping areas with retail, service, civic, and office uses for the community at large within three to six miles. It can also be applied to Transit Corridors where multifamily residential uses could be added to enhance the viability of existing commercial uses.

Regional Commercial - Serves the region, within five to 25-plus miles, with a wide variety of uses, including commercial service, civic, retail, office, and limited industrial uses. Residential uses may occur as part of a mixed-use (commercial/residential) project.

It is important that walkable mixed-use communities require horizontal development. Allowing too much density on a single parcel may result in the unintended consequence of isolated, automobile-dependent, premium rent residential towers.

p. GL-22 (added) Multiple-Use Residential Land Use

Accommodates a variety of housing types, encourages the provision of housing for all citizens of San Diego, and recognizes the benefit of providing more than one use in the same location to reduce dependency on the automobile and provide for a walkable pedestrian-oriented setting. Allows multiple uses in a mixed-use site plan or building that is residentially focused. Residential density ranges and allowed uses are further refined through community plans. This category of land use includes:

Multi-Family Residential (details omitted)

Community Commercial (details omitted)

Downtown (details omitted)

It takes more than words to achieve these goals, and it is not clear how Blueprint SD will achieve them.

p. GL-31 (added) Residential Land Use

Accommodates a variety of housing types, including both single-family and multi-family, at various specified densities throughout the City and encourages the provision of housing for all citizens of San Diego. Residential land use can be residential-only or accommodate multiple uses in a mixed-use site plan or building (see "Mixed-Use" and "Multiple-Use Residential Land Use" for further information). Residential density ranges and allowed uses are further refined through community plans.

Note that zoning overrides such as Complete Communities Housing Solutions and the Bonus ADU program, override zoning by an extreme amount, confounding the community plan update process.

p. GL-35 (added) Structurally Excluded Community

A shift from labeling a community as underserved to structurally excluded places the focus on systems intentionally created to exclude, marginalize and oppress instead of the individuals or people living in their communities. The term structurally excluded community takes into consideration how racial disparities are often connected to place and are rooted in historic racialized policies and practices that created and maintain unfair racial outcomes. A structurally excluded community takes into consideration how systems interact with racial and ethnic differences to design disparities and shape racial biases which impact access to health, education, economic capital, social position, safety and opportunity.

A key structure of exclusion in San Diego is the overextension of Sustainable Development Areas (SDAs) and Transit Priority Areas (TPAs) as applied to the south of I-8 communities that constitute the areas of greatest needs. This results from the unwarranted extent of the SDA (up to 1 mile from transit), inclusion of future transit stops instead of limiting to existing transit, and failure to recognize that the transit routes in these areas are vestiges of the mid-1900s when

downtown was the major job center for the city, and therefore do not meet the outcome-based standards of high-quality.

The misconstruction of the SDA drives two negative outcomes: first, turning single-family neighborhoods into de facto multi-family zones via Bonus ADUs and the proposed SB 10 implementation allows opportunistic investors to crowd out would-be homeowners; and second, diffusing development across an overly broad SDA inhibits the creation of neighborhood-centering density that is essential to the success of City of Villages, both for neighborhood economic development and for transit efficiency and connectivity.

COMMUNITY PLANNERS COMMITTEE

San Diego, California

Top Ten Revisions to the Proposed “Blueprint SD” Project

The Community Planners Committee (CPC) held several hearings on the “Blueprint SD” project during 2023 - 2024 and created the CPC Blueprint Ad Hoc Subcommittee.

The recommendations are found in the report, “Community Planners Committee Blueprint SD Responses”. That document consists of detailed comments on each element of the Blueprint SD project, and an Executive Summary.

This document, the “Top Ten” is a companion to the complete report. The ten items selected are the most important of the needed additions to the proposed Blueprint SD project.

The Top Ten

1. At the time of Community Plan Updates, the latest population forecasts shall be obtained, and the community plan development capacity, existing and proposed, reconciled with the forecasts.
2. Urban design guidelines must include provisions which ensure that the unique attributes of the communities will be retained and enhanced.
3. Implementation provisions shall ensure that projects with a major impact on a community will trigger a discretionary review. This trigger may be based on height, number of housing units, size of non-residential building space, or size of the site.
4. Community Plan Updates are intended to result in adequate housing sites, and projects which are suitable in density, height, and form. To prevent overriding the new community plans, the Complete Communities: Housing Solutions ordinance shall be suspended in communities that complete a Community Plan Update after the adoption of Complete Communities: Housing Solutions.
5. In low-resource communities, policies shall include incentives for moderate income and market rate housing with opportunities for employment and provide for full-service retail outlets that brings low-resource communities within a reasonable standard deviation to match the median resources and income of the city.
6. Community Plan Updates and infrastructure plans shall ensure that public facilities will be provided concurrent with development.
7. Parks and recreation planning is based on a community’s population. Therefore, the amount of authorized development and the projected buildout population must be proportional to the parks and recreation facilities which can feasibly be provided.
8. Develop incentives for adaptive reuse, to conserve embedded energy and limit the burdening of landfills with construction debris.
9. Improve protections for mature trees, to preserve the tree canopy. This will help to sequester carbon and reduce urban heat-island impacts.

COMMUNITY PLANNERS COMMITTEE

San Diego, California

10. When community plan updates occur, include an analysis of Land Value Capture to provide revenue for needed public facilities and community benefits.



Peninsula Community Planning Board
1220 Rosecrans Street PMB 549
San Diego, CA 92106
pcpsd@gmail.com

Date: May 30, 2024

TO: BlueprintSD@sandiego.gov

Subject: 2024 General Plan Amendment Comments

Dear Chairperson Moden, Planning Commissioners, and Planning Department Staff:

The City of San Diego released the update to the General Plan, BluePrint SD, on March 15, 2024 along with the associated Programmatic Environmental Impact Report (PEIR) for Public Review. Community comments were due within a short 45-day review period, April 29, 2024. BluePrint SD proposes to make substantial changes to current zoning and maximum densities that increase densities throughout the City with New York style densities of up to 290 plus units per acre along with increased densities in existing single-family neighborhoods. As stated in the PEIR, increased densities will result in significant unmitigated environmental impacts. Identified impacts include insufficient public services, recreational facilities, and infrastructure which will have a detrimental impact to the quality of life to San Diegoan's.

The Peninsula Community Planning Board (PCPB) opposes the adoption of BluePrint SD and requests that the City of San Diego extend the comment period, provide projected numbers as to how the zoning and density changes will affect the number of units built in Point Loma and their impact on parking and infrastructure compared to the existing general plan, and provide a public outreach program which reflects the proposed vast changes in land use and character of Point Loma. The vague maps in Blueprint San Diego do not provide this information that is necessary for adequate public input.

Following are PCPB comments to the General Plan update and PEIR:

General

BluePrint SD updates the General Plan Village Propensity Map which identifies new and enlarged Village Areas with increased housing density and areas that convert low-density single-family housing to multi-housing use. As stated, this map forms the base for further updates to Community Plans. The Propensity map lacks specifics, does not define increased densities and the scale provides uncertainty to the parcels (areas) proposed for change. In addition, the maps do not provide projected housing numbers under the proposed amendments and current general plan to inform the public about the resulting changes to density, parking or infrastructure the amendments would create. The proposed changes could create densities that will resemble cities such as New York, San Francisco and Los Angeles. Many San Diegans do not wish San Diego to morph into the densities of these cities that the plan amendments could create.

The Environmental Document (Section 3.5.1.3) states that Community Plan Updates that are consistent with the Propensity Map and the City of Village Strategy would be evaluated consistent with the Proposed Programmatic Environmental Impact Report and proposed density and not require additional environmental review. **PCPB cannot support the adoption of the Proposed Propensity Map without**

greater detail and community input.

Increased Flooding

Blueprint SD will reduce greenspace area while increasing impervious surface areas resulting in increased surface runoff. The PEIR identifies that BluePrint SD... “would have the potential to exceed the capacity of existing or planned stormwater drainage facilities.” Due to the recent devastating flooding that affected our City, the PCPB requests that a comprehensive analysis be performed to identify the increased risk of flooding and analysis of the associated run-off with increase densities proposed under BluePrint SD.

Traffic Congestion and Incomplete Transportation system

BluePrint SD and the City of Villages Strategy is based on connectivity of the regional transit system, future transit investments, and implementation of SANDAG’s 2021 Regional Plan. There is a shortfall and gap of funding for the implementation of the \$170 billion 2021 Regional Transportation Plan. Increases in density are also proposed outside the conventional one-half mile commuter walking/rolling distance from transit. Studies and state standards have demonstrated the usage of public transportation drastically drops off beyond a one-half mile walking distance. The Blueprint San Diego Plan wants to designate land use density to support transit goals rather than plan transit to support existing and forecasted land use and density which is backwards planning. PCPB requests that BluePrint SD comply with recognized standards and update the General Plan to reflect the actual public transit system rather than speculating on future funding and a non-existing transit system.

Greenhouse Gas Emissions (GHG)

BluePrint SD states that “Fuel-powered vehicles are the largest source of greenhouse gas emissions and pollutants impacting our air quality. The Climate Action Plan sets a goal of net zero emissions and at least half of all trips across the City will need to shift to more sustainable, climate-friendly modes like walking/rolling, biking, or taking transit. **Also, the Mobility Plan and PEIR fail to incorporate the most recent state and federal mandates that all new passenger cars will be zero-emission vehicles by 2035. PCPB requests that the City update and revise to reflect that new standards and zero-emission vehicles by 2035.**

Local Peninsula Community Opposes BluePrint SD Density Increases BluePrint SD proposes to update the General Plan Village Propensity Map which identifies new and enlarged Village Areas with increased housing density. This map will form the base for further updates to Community Plans. As stated in the report and shown on the map, areas shown in purple and blue have the highest densities. The Propensity map does not define the increased density and the scale provides uncertainty to the areas proposed for density increases. PCPB cannot support the adoption of the Proposed Propensity Map without greater detail and community input.

The Village Propensity Map proposes to locate a high-density village in the Fleetridge /Wooded Area of Point Loma . This area is currently zoned single family -low density. The PCPB opposes a village strategy in this area, without community input and support. This area lacks adequate transportation, has the potential to hinder and block view corridors, and lacks the infrastructure to support high density.

Page LU-6 states that residential land use designations will increase to higher uses. The Village Propensity Map recommends a conversion of single-family zoning in the Roseville neighborhood and other single-family neighborhoods in the Point Loma Community. Clearly define the areas where single family residential land use designations are proposed for greater densities and seek community input.

Mobility Element

Bikeways. Large sections of roadways needed for Vehicle Traffic have been converted to bikeway use, and

in one case, just having one lane for traffic in both directions. Bikeways in urban areas are not used nearly as much as vehicles and are seldom used by Seniors when residents need to go shopping. Policy needs to be amended to specify that bikeways will not be designed that significantly and adversely affect vehicle traffic causing vehicle congestion. Also specify that any bikeway conversion leave at least two lanes for vehicle traffic (coming and going) and that roadways will not be diverted to bicycle use where there is little to no bicycle traffic.

Parking. The existing general plan allows developers to pay an in-lieu fee rather than provide parking for their developments. The proposed amendments also allow the city to charge a floating parking rate to limit demand. This would be another way for the city to generate more revenue and should not be allowed because it adversely affects lower income residents. Adequate parking is needed to support development to avoid traffic congestions that these policies do not promote and should be deleted as part of the general plan amendments.

. The letter was approved with a vote of 12-0.

Sincerely ,

A handwritten signature in blue ink, appearing to read 'Fred Kosmo, Jr.', with a long horizontal flourish extending to the right.

Frederick W. Kosmo, Jr.
PCPB-Chair

**Andrew Hollingworth CPA
1907 Capistrano Street
San Diego, CA 92106
amhollingworth@sbcglobal.net**

Date: May 30, 2024

TO: City of San Diego Planning Commission

RE: **Item #2 - Urge Planning Commission To Deny Blueprint San Diego Initiative**

Dear Chairperson Moden and Planning Commissioners:

I am a member of the Peninsula Community Planning Board (PCPB) writing on behalf of myself and not the PCPB. **I urge the Planning Commission to deny the Blueprint San Diego initiative as proposed by the Planning Department because of its substantial proposed increase in housing density, the lack of transparency and public input, and because it does not address the reasonable concerns and revision requests made by the Community Planners Committee (CPC) at their May 28, 2024 meeting.**

Housing Density Increase. Blueprint SD proposes to make substantial changes to current zoning and maximum densities that increase densities throughout San Diego with up to 290 plus units per acre along with increased densities in existing single-family neighborhoods. Increased densities will result in significant unmitigated environmental impacts such as insufficient public services, increased traffic, and inadequate recreational facilities and infrastructure which will have a detrimental impact on Point Loma.

Blueprint San Diego incorporates several vague maps showing proposed density changes but no projected numbers as to as to how the density changes will affect the number of units built in Point Loma and their impact on parking and infrastructure compared to the existing general plan. Also, the Environmental Impact Report was not available for public review as of Wednesday May 29, 2024 at 11:30 A.M. on the Planning Committees Agenda. **Blueprint San Diego is vague and aspirational but will form the standard upon which future community plan updates have to conform and therefore should be denied until the required data and transparency by the Planning Department is provided for community review and input.**

Lack of Transparency and Public Input. Contrary to the representations of the Planning Department, the members of the Peninsula Community Planning Board were not informed about Blueprint San Diego and had only a few days to review this large document before we had to craft a response. There was no presentation by the Planning Department to the PCPB about its provisions. Similarly, only two Community Planning Board of the Community Planners Group Committee meeting on May 28th, said they had seen a presentation by the Planning Department at their Planning Committees. Furthermore, the Environmental Impact report was not available for review as of Wednesday May 29, 2024 at 11:30 A.M. on the Planning Committee's agenda. Planning Department staff stated presentations were not necessary because Blueprint San Diego is merely an update to the General Plan rather than the defacto substantial policy change that it is. **This "force feeding" of the City Planning Department's position to the community should be denied until they can form a consensus regarding the future direction of San Diego development.**

Lack of Adequate Response to the Community Planners Committee concerns and recommended Top 10 Revisions to Blue Print San Diego. The Community Planners Group and the Peninsula Community Planners Board have crafted thoughtful and detail responses to Blueprint San Diego that have not been responded to by the Planning Department. The Community Planners Group wrote a 34-page response entitled “Blueprint San Diego Responses Revised 4-19-24” and “Top Ten Revisions to the Proposed “Blueprint San Diego Project”. The PCPB also wrote a three-page letter detailing their concerns.

The following two recommendations of the Community Planners Committee deserve a specific response:

1. At the time of the Community Plan Updates, the latest population forecasts shall be obtained, and the community plan development capacity, existing and proposed, reconciled with the forecasts.
6. Community Plan Updates and infrastructure plans shall ensure that public facilities will be provided concurrent with development.

The Planning Department did not provide a meaningful response to these and other concerns in their Report to the Planning Commission. Instead, they just reference other plans such as the Climate Action Plan, the Mobility Plan and yet-to-be-developed future community plans in their response. I therefore urge the Planning Commission to deny Blueprint San Diego until all the written concerns and recommendations have been meaningfully responded to.

In summary, Blueprint San Diego presents a vision for dense development without adequate infrastructure, parking and automobile transit that long-time residents do not want that will perpetuate the outflow of residents and depletion of the tax base that will reduce the quality of life and future funding for city services for all San Diegans.

Sincerely ,

Andrew Hollingworth

Andrew Hollingworth
Member, Peninsula Community Planning Board



Save Our Heritage Organisation

Protecting San Diego's architectural and cultural heritage since 1969

May 28, 2024

Planning Commission
1222 First Avenue
MS 501 San Diego, CA 92101

**RE: May 30, 2024 Item 4: Hillcrest Focused Plan Amendment
Chapter 5: LGBTQ+ Cultural and Chapter 11: Historic Preservation**

Dear Chairperson Modén, Vice-Chairperson Boomhower, Commission Members Miyahara, Mahzari, Otsuji and Malbrough,

Save Our Heritage Organisation (SOHO) appreciates the opportunity to offer feedback on the May 2024 - Hillcrest Focused Plan Amendment Draft.

Planning Issues

We do not believe that development by right of historic facades should be allowed without some further historic design review for contributors to the historic district. Each Historic site may have unique character defining elements and history, which may require different treatments to ensure adequate preservation of these features. Case in point, the bar known as No. 1, 5th at 3845 5th has a back courtyard that is a significant part of LGBTQ+ civil rights history. This courtyard is where many in the community gathered and organized in the early development of this district when it could be unsafe to be close to the street. This courtyard has been respected by the new development on the Pernicanos site that now surrounds it. This new development has windows that open upon this inner courtyard. Significant spaces such as these that also are opportunities for light, air and increased livability could be lost by only focusing on the facades with no further review.

This 10' street setback for towers on University is completely inadequate to respect the pedestrian oriented environment and significant buildings such as the National Register eligible bank building at the NE corner of 5th and University and the Deli building with the cast fruit freezes and corner tower at the SW Corner of 4th and University. This setback should be a minimum of 20'.

Setbacks for towers above 75 ft should be set back 50 feet from the Street. This is what is allowed along "J" street in the ballpark district downtown and it has maintained light and air and allowed a vibrant pedestrian orientated environment while accommodating dense towers appropriate to a modern downtown central business and residential district. J street is a wide street and 5th is narrow, so in this case it is even more important to have appropriate setbacks so as not to create an unfriendly dark canyon.

Historic Preservation and Cultural Heritage

1. **Integration of Historic Sites into the LGBTQ+ Cultural District:** It is essential that designated and potential historic LGBTQ+ sites are prominently integrated into the LGBTQ+ Cultural District. These sites are crucial for connecting the past, present, and future of the community, serving as anchors for cultural and interpretive elements.
2. **Chapter 5 and Chapter 11 Alignment:** While Chapter 11 addresses the identification of historic sites, Chapter 5 should also explicitly emphasize the importance of preserving these sites. Historic preservation must be a clear goal within the LGBTQ+ Cultural District framework.
3. **Adaptive Reuse of Historic Sites:** We support policies that facilitate the adaptive reuse of historically designated LGBTQ+ sites within the Cultural District. This approach helps link the community's history to its future development.

4. **Distinction Between Cultural and Historic Districts:** It is important to distinguish the complementary roles of cultural and historic districts. While cultural districts focus on place-making and supporting cultural legacies, historic districts protect areas with significant historical value. Both are necessary for a holistic approach to preserving and promoting LGBTQ+ heritage in Hillcrest.
5. **Recognition and Preservation Goals:** The Focused Plan Amendment should explicitly state the objectives of preserving designated historic LGBTQ+ sites and identifying potential historic sites. This will ensure that LGBTQ+ history and memory are continuously incorporated as the Cultural District evolves.
6. **Avoiding "Rainbow Washing":** Interpretive elements should go beyond mere symbolic gestures. The emphasis should be on preserving actual historic sites rather than relying solely on plaques and signage, ensuring a genuine representation of LGBTQ+ history.
7. **Comprehensive Historic Preservation Strategy:** A strong maintenance program for historic sites and interpretive elements is necessary to prevent deterioration. The plan should include clear timelines and financial backing to ensure effective implementation.
8. **Inclusion of All LGBTQ+ Communities:** The Cultural District should incorporate stories from diverse LGBTQ+ communities, including Trans, Black, BIPOC, API, and Indigenous groups, reflecting the rich tapestry of Hillcrest's history.
9. **Correction of Historical Records:** It is noted that the statement regarding the absence of resources from the 1970-present era on the City's Register is incorrect. For example, the Center/Gayzette/Albert Bell Building at 3780 Fifth Avenue is a designated resource.

Thank you for reviewing and considering our feedback. Preserving Hillcrest's LGBTQ+ history is essential for honoring its past, enriching its present, and shaping its future identity.

Sincerely,



Bruce Coons
Executive Director
Save Our Heritage Organisation (SOHO)



May 28, 2024

To: Planning Commissioners

Re: Suspension of Complete Communities Housing Solutions in Community Plan Updates

Dear Commissioners,

Neighbors For A Better San Diego strongly supports the recommendations of the University Community to suspend the use of Complete Communities Housing Solutions upon adoption of the University Community Plan Update.

Complete Communities Housing Solutions (CCHS) was adopted by San Diego in 2020 as an emergency housing measure with the goal of stimulating the production of market-rate housing (with some affordable housing). The City justified this by the aggressive housing targets in the 2021-2029 Regional Housing Needs Allocation (RHNA) cycle, and because San Diego was slow in updating community plans.

CCHS is a blunt instrument that optimizes the development of market-rate housing at the expense of affordable housing, climate action, and public amenities. Accordingly, as San Diego implements its community plan updates to meet current and future housing needs through zoned density.

The adoption of CCHS provides precedence and justification for this proposal. When CCHS was adopted, Mission Valley was assigned a much lower floor area ration (FAR) based on its recent community plan update. Other communities should be given the same leeway as Mission Valley to develop under their planned zoning.

We also recommend that the suspension of CCHS also be applied to the Hillcrest Focused Plan Amendment and all future plan updates.

I've attached a full analysis and rationale for this recommendation.

Respectfully,

Geoffrey Hueter

Chair, Neighbors For A Better San Diego

Let Community Plans Work by Suspending Complete Communities Housing Solutions in Community Plan Updates

SUMMARY

Complete Communities Housing Solutions (CCHS) is an emergency housing measure adopted by San Diego in 2020 with the goal of stimulating the production of market-rate housing (with some affordable housing). The City justified this by the aggressive housing targets in the 2021-2029 Regional Housing Needs Allocation (RHNA) cycle, and the lag in updating community plans.

While CCHS has been increasingly popular with developers, it has two major flaws that argue against preserving it as a long-term housing incentive:

Flaw #1: While the required number of affordable housing units is proportional to underlying zoning, the total allowed development is not, leading to a situation where developers target parcels with the lowest zoning, subverting affordable housing goals and pushing development away from high-density transit corridors.

Flaw #2: The allowed development is applied across broad areas instead of being concentrated on transit and commercial corridors.

Flaw #3: The poorly-written regulations defining the areas with the highest allowed development, based on proximity to UCSD and the UCSD Medical center, create pockets of extremely high density far away from the campus.

The development allowed under CCHS dwarfs what is intended under even the most aggressive alternatives proposed in either the University or Hillcrest plan updates. NFABSD has estimated that using CCHS, 241,000 homes could be added to Uptown and 215,000 units could be added to the University Community, four times the housing that is planned under current planning scenarios (53,000 for the Hillcrest FPA and 57,000 for the University CPU). And not only is the total allowed density significantly higher, but CCHS also overrides the planned transition zone regulations in the community plan, including regulations for transition planes, ground-level setbacks, upper-story setbacks, and other requirements.

Accordingly, we recommend that adoption of an updated community plan should suspend CCHS in that community through at least two RHNA cycles. This will allow enough time for the community plan update to meet the needs of the community in the way that it was intended by city planners and the community.

A significant amount of work goes into a community plan update. It makes no sense to have a program such as CCHS that undermines the best intentions of the plan.

Note that the legislative record for the adoption of CCHS provides precedence and justification for this proposal. When CCHS was adopted, Mission Valley was assigned a much lower FAR based on a recent CPU. Other communities should be given the same leeway as Mission Valley to develop under their planned zoning.

DETAILED ANALYSIS

The ways that CCHS confounds community planning best practices and produces sub-optimal results are detailed below.

Makes it impossible to zone for medium density housing. CCHS can be applied to any zone that supports multi-family housing at a density of at least 20 dwelling units per acre (du/acre). As an example, the University Community Plan Update proposes zoning the 8.5 acre parcel at 3358 Governor Drive (current Sprouts site) to 29 du/acre, which would allow 248 homes on the site. However, because of nonsensical CCHS overlays (1 mile as the crow flies from a university campus with a medical center), the site has an allowed floor area of 8.0 times the lot size, which for a generous average unit size of 700 sf equates to 3,189 units, or 375 du/acre. (See Attachment A.)

There is only one road that leads out of this area. From the standpoint of traffic capacity, road reconfiguration, and evacuation in the case of fire, it clearly makes a huge difference whether this site will have 248 added homes or 3,189 homes.

Can't plan transitions between high-density corridors and lower-density residential. Because lower-density transition zones require less affordable housing and hence offer a higher return on investment, developers will build high-rises on the parcels intended for transitional density and leave the corridors themselves in their current underutilized state (automobile-centric strip malls and drive-through restaurants).

Anti-climate. Because CCHS pushes development away from intended high-density transit corridors, transit adoption will be less than would otherwise be expected, undermining San Diego's Climate Action Plan.

Can't plan for infrastructure. Referring back to the example of the Sprouts parcel in the University Plan Update, whether there are 248 or 3,189 units on a site produces vastly different decisions about traffic, water, sewer, public spaces, etc.

Lower percentage of affordable housing. Affordable housing requirements for CCHS are applied to the base density, not the total project. As a result, developers have learned to target CCHS to parcels that barely exceed the 20 du/acre threshold. CCHS affordable housing percentages are trending towards low single digits as time goes on. (See Attachment B.) This neutralizes San Diego's inclusionary affordable housing ordinance (IAHO), which would otherwise require 10% affordable units.

It is worth noting that the Keyser Marston study of affordable housing in the University plan update completely ignored CCHS, which completely invalidates that study.

No money for infrastructure. CCHS waives DIFs on the majority of units, leaving little revenue for parks, infrastructure, and public improvements needed to support added housing.

Poorly configured FAR overlay. The 8.0 FAR allowances in the University and Uptown communities are based on a 1 mile radial (crow-flies) distance from a campus with a medical center. Not only is a "campus with a medical center" not clearly defined in the Municipal Code, but not using a walking distance standard means that the Sprouts site on Governor Drive (which is in the 8.0 FAR zone

because off-campus housing across Rose Canyon) is allowed higher density than the Von's site at the intersection of Genesee and Governor. Suspending CCHS eliminates this absurdity

Ignored in planning analysis. Because of all of the above challenges in accounting for CCHS in community plan updates, City planners elect to ignore its impact in their plans.

CCHS is not accounted for in the University or Hillcrest Community Plan Updates, the EIRs, or the Keyser-Marston study for the University Community Plan Update. This means that any analysis of the impacts of the Community Plan Updates, either total density or affordable housing, is woefully inadequate.

This is especially important with respect to affordable housing production because CCHS cannibalizes other affordable housing programs and replaces naturally occurring affordable housing with fewer deeded-affordable units.

CCHS is a blunt instrument intended as a temporary measure to spur housing production while the City works through its community plan updates. It optimizes development of market rate units, but at the cost of affordable housing, climate action, and public amenities.

Because CCHS incentives are anti-correlated with zoned density, the only way to manage CCHS in community plan updates is to suspend its use as part of the plan adoption. It can be reactivated if community needs aren't satisfied over the next full housing (RHNA) cycle.

Attachments

Attachment A. Sprouts Site CCHS Example

Attachment B. Declining Affordable Housing Percentages of CCHS Projects

Attachment A. Sprouts Site CCHS Example

Complete Communities Housing Solutions is an override of existing zoned housing capacity that allows a specified amount of high-density development independent of the underlying zoning. The amount of development is defined by Floor Area Ratio (FAR), which is the buildable area for the parcel. As can be seen on the map below, different parts of the University community have different FARs.

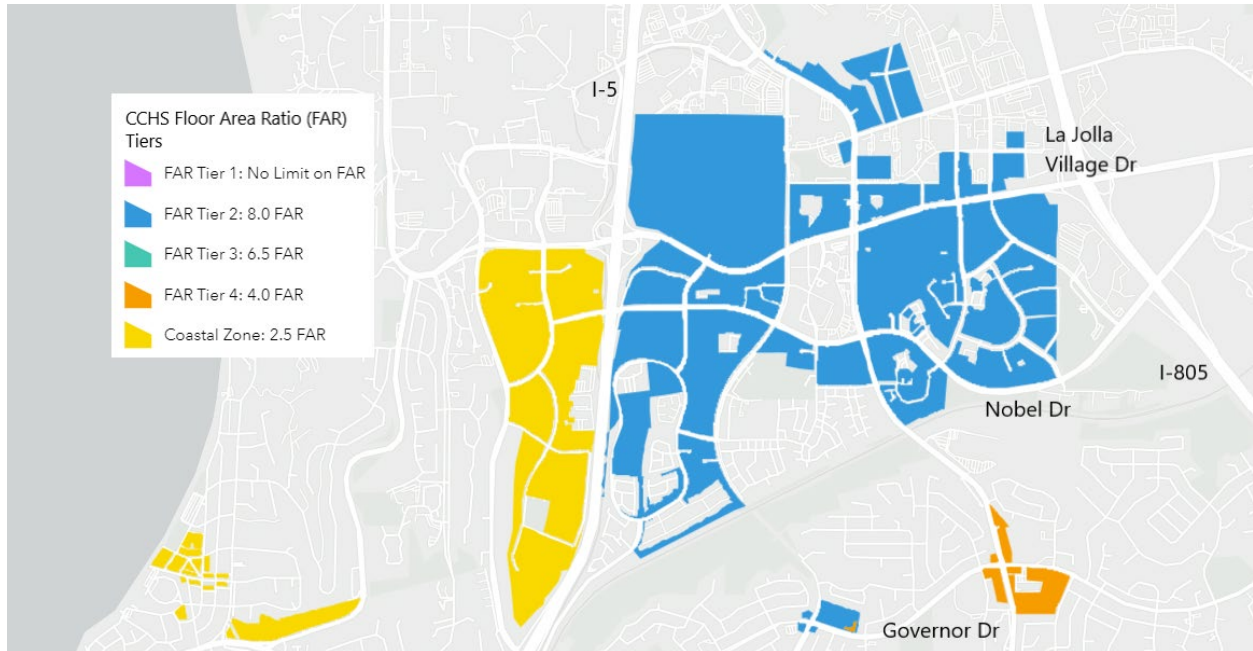


Figure A1-1. Complete Communities Floor Area Ratio Map for the University Community.

The CCHS FAR map highlights a key flaw of the CCHS code, namely that the areas within 1 mile radial (crow flies) distance of some designated part of UCSD are assigned a FAR of 8.0, including the site across Rose Canyon that is over two miles walking distance from the purported UCSD location, which is a student housing complex (La Jolla Del Sol), not an educational or medical facility. (See Figure A1-2 below.)

Conversely, the intersection of Governor and Genesee (Vons site), which is being planned for higher density than the Sprouts location, has a lower allowance (6.5 FAR) than the Sprouts location (8.0 FAR), even though it is located on a direct route to the UCSD campus.

Because the Sprouts site will most likely have a lower zoned density than the Vons site, while also having a greater allowance of market rate development, the less desirable location for high-density (Sprouts site) will be favored for development over the more sensible location (Vons).

This inconsistency can only be fixed by suspending CCHS in the University community.

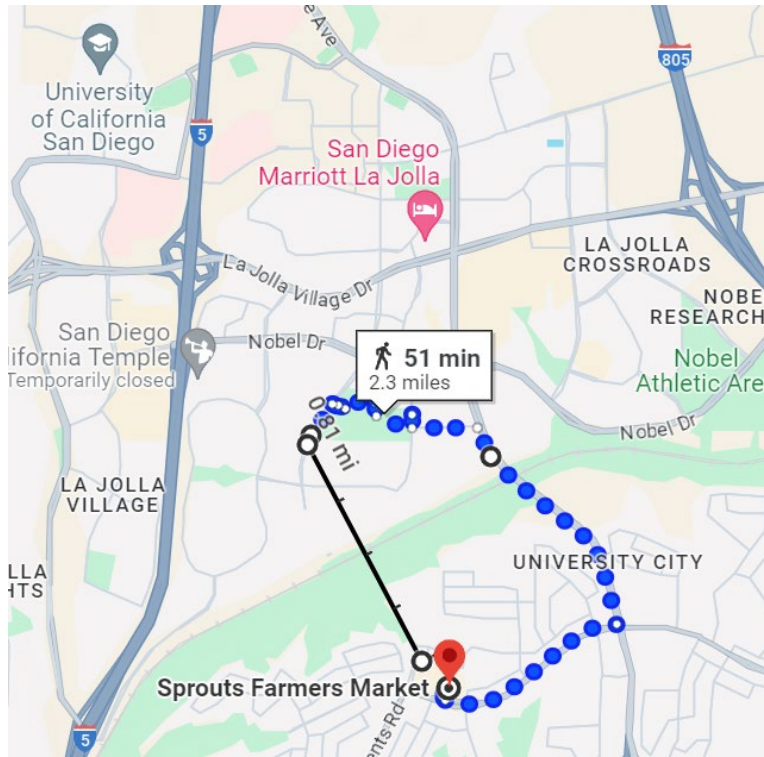


Figure A1-2. Application of CCHS Regulations to Sprouts Site

Calculation Details

Figure A1-3 details the calculation of the number of units that can be built on the site using Complete Communities Housing Solutions to override the underlying density.

Underlying Zoning	
Lot Size (acres)	8.54
Lot Size (sf)	372,000
Base Density (du/acre)	29
Base Units	248

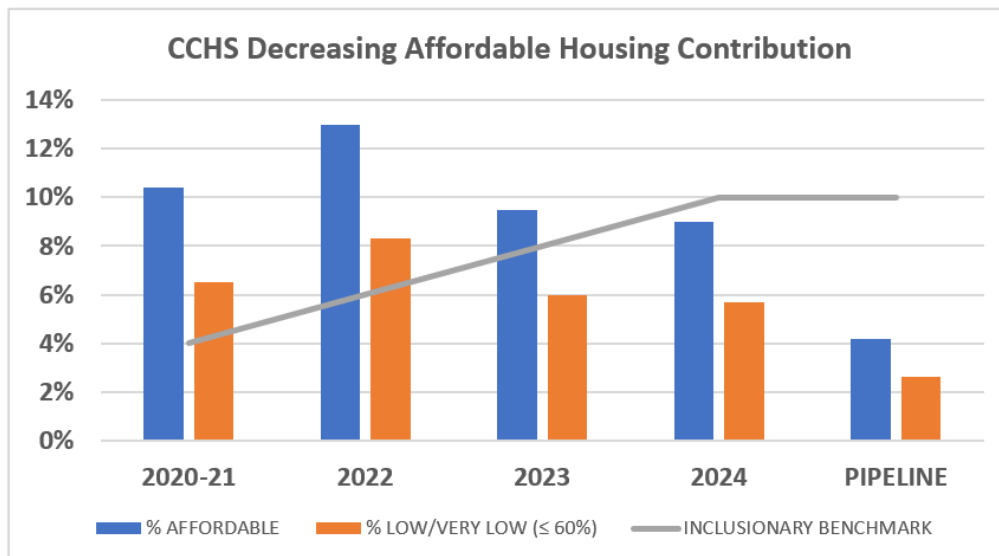
CCHS	
Affordability Requirement	40%
CCHS FAR	8
Buildable Area	2,976,000
Unit size	700
Common Space	25%
Number of Units	3,189
Lot coverage	50%
Building Height (stories)	16
Affordable Units	99
Net Affordable (% of all units)	3.1%

Figure A1-3. Estimation of CCHS Capacity for 3358 Governor Drive (Sprouts site)

Attachment B. Declining Affordable Housing Percentages of CCHS Projects

As market-rate housing developers figure out how to make Complete Communities Housing Solutions (CCHS) work for their greatest benefit, the percentage of affordable units in CCHS projects has steadily declined. The current pipeline of CCHS projects will produce less than 3% affordable units for low and very-low income residents, versus the 10% affordable units that would be required by San Diego's Inclusionary Affordable Housing Ordinance.

Because more than 80% of the land available for multi-family and mixed-use commercial development lies within San Diego's overly expansive Sustainable Development Areas, and allowed densities are many times higher than underlying zoning, it can be expected that CCHS will be the dominate mode of development. Therefore, the impacts of these projects should be fully considered in community plan updates (CPUs), or preferably, CCHS should be suspended upon adoption of a CPU, so that subsequent development in the community planning area will follow the intent of the CPU.





April 29, 2024

To: San Diego City Planning

Re: Blueprint SD PEIR Omits Impacts for Bonus Housing Programs

The Draft Program Environmental Impact Report (PEIR) for the Blueprint SD Initiative is deficient because it treats only zoned capacity for housing and does not also calculate the amount of housing that is allowed under various San Diego bonus programs. These programs can produce roughly ten times more housing than base zoning. Also, whereas planned zoning locates housing in dense clusters close to transit (City of Village), bonus housing programs, such as Complete Communities Housing Solutions and Bonus ADUs, provide the highest economic returns in lower density areas away from transit, thereby subverting San Diego's VMT reduction goals.

San Diego's projected housing need (Regional Housing Needs Assessment, or RHNA) for the 2021-2029 RHNA cycle is 108,036 homes. As part of its Housing Element, San Diego has calculated the capacity to build new housing under existing zoning. The resulting capacity, as of September 2021, is 174,673. This calculation, which is now several years old, has not been updated by the City based on recent Community Plan Updates (CPUs) to Kearney Mesa and Mira Mesa, nor does it reflect the increased zoned capacity in the pending University and Uptown CPUs. Combined, these CPUs may add the capacity for 100,000 to 200,000 more homes. As a result, San Diego would have the identified zoned capacity to build two to three times as many homes as are needed to meet its RNHA allocation. This exceeds the City's stated standard to provide two times overzoning (ratio of capacity to projected need), which means that further upzoning may drive up already high land prices without an appreciable increase in land turnover and housing development.

In addition to the zoned housing capacity, San Diego parcels are eligible for bonus development under the programs listed in Table 1. The applicable housing bonus program is determined by the underlying zoning (Commercial/Multi-Family or Single-Family) and whether the parcel is inside or outside of a Sustainable Development Area (SDA), which is based on various criteria, primarily whether the parcel is within 1 mile walking distance of a transit stop (existing or future).

Table 1. San Diego Bonus Housing Programs

	Commercial/Multi-Family	Single-Family
Inside SDA	Complete Communities Housing Solutions	Bonus ADU (unlimited)
	Density Bonus	
Outside SDA	Density Bonus	Bonus ADU (3 ADUs per parcel)

Complete Communities Housing Solutions (CCHS) – Allows for development up to a floor area ratio (FAR) limit. The FAR allowance varies in different parts of the city from 2.5 in the coastal zones to 8.0 in parts of the Uptown and University communities. In general, CCHS provides many times more housing (4 times or more) than the underlying zoning.

Density Bonus – Allows for 50-100% increase in density over underlying zoning. While Density Bonus could be utilized inside the SDA, the much greater density allowed by CCHS and substantially lower percentage of affordable units required makes it likely that the developer would elect to use CCHS.

Bonus ADU – State law allows for the addition of an Accessory Dwelling Unit (ADU) and a Junior Accessory Dwelling Unit (JADU) In addition to an existing single-family home and Junior Accessory Dwelling Unit (JADU) on any single-family zoned lot. San Diego allows 2 additional ADUs anywhere in San Diego, and an unlimited number of ADUs (up to the FAR of the parcel) inside the SDA. The Bonus ADU program has produced developments of 5 or more ADUs added to a single-family parcel.

Neighbors For A Better San Diego has estimated the potential (allowed) housing capacity of these programs by evaluating each parcel in San Diego. Using ArcGIS, the relevant attributes were extracted for each parcel, including zoned use, lot size (expressed in square feet or acreage), and whether or not the parcel is in the SDA. These values were used to calculate the capacity of the parcel to support additional housing units. The capacities of the individual parcels were summed up to estimate the total allowed capacity for San Diego. Parcels were also summed up by Community Planning Area for comparison with community plan update proposals. (Planned and unplanned densities for the proposed Uptown and University Community Plan Updates are compared below.)

These estimates, which include the increase of CCHS allowances in the recently enacted Housing Action Package 2.0, are summarized in Table 2.

The number of units that can be built on a parcel using CCHS and Bonus ADUs are both based on allowed floor area ratios for total development. Estimating the number of units that can be built on a parcel depends on assumptions of how large the units will be. The

CCHS calculations assumed an average unit size of 700 square feet (sf) and that 25% of the floor area of the structure would be allocated to common use (hallways, reception, etc.).

The estimate of the number of Bonus ADUs that can be built in San Diego was calculated using an average unit size of 450 sf, lot size of 9,500 sf, and existing house size of 1500 sf.

Table 2. San Diego Allowed Housing Capacity Estimate

Zone	Inside/Outside SDA	# Units
Commercial	Inside SDA (units)	1,257,318
	Outside SDA (units)	42,075
	Total Commercial Capacity (units)	1,299,393
Single Family	Inside SDA (units)	713,034
	Outside SDA (units)	302,109
	Total SF Capacity (units)	1,015,143
Total Estimated San Diego New Home Capacity	Total Housing Capacity (units)	2,314,536
	RHNA Goal (units)	108,036
	Over-Capacity (relative to RHNA)	21x

As can be seen from the table, San Diego's total allowed housing capacity under all housing programs (zoned + bonus) is estimated to be 2.3 million units. Noting again that San Diego's zoned capacity (Adequate Sites) is of the order of 200,000-300,000 new units, it can be seen that bonus density programs provide up to ten times the capacity for new housing as underlying zoning. This calls into question how the city can shape communities through community plan updates when the intended (planned) development is dwarfed by random bonus development.

As it relates to the Community Plan Updates in the PEIR, Uptown and University, the estimates for these communities, without any changes in the Community Plans, is 241,000 new units for Uptown and 215,000 new units for University, which vastly exceed the zoned allowed capacities anticipated for these communities. Uptown's currently adopted plan allows for 35,600 new units, with 17,000 more units being proposed as part of the pending Hillcrest Focused Plan Amendment. The total resulting zoned capacity, 52,600 new units, is only about a fourth of what could be built using Bonus programs (mostly CCHS).

Similarly, the University Community Planning Area has an adopted capacity of 28,000 new homes, with a proposal to add capacity for 29,000 additional units as part of the pending

University Community Plan Update proposed. Even after adoption of the plan with a capacity of 57,000 new homes, the bonus capacity would be three times the zoned capacity.

In addition to the lack of a complete analysis of the housing capacity of the bonus housing programs, the PEIR fails to analyze the impacts due to where these programs incentivize development. For example, Complete Communities Housing Solutions may be applied to parcels that exceed a threshold of 20 dwelling units per acre (du/acre). Because the total development is determined by the FAR allowance for the parcel and the number of affordable units is only calculated on the base density, developers seek out parcels that have the lowest underlying density, thereby minimizing the obligation to provide affordable housing. This perverse incentive confounds community planning, which typically provides the highest zoning on major commercial and transit corridors, where the added density would encourage viable walkable neighborhood commercial districts. These activity hubs would also provide destinations for transit riders and thereby increase transit adoption. However, under CCHS, the most attractive sites for projects are the intended transition zones between the high-density corridors and low-density (automobile-centric) residential areas. This increases distance to transit and de-centralizes the commercial core of the community. Increasing the distance to transit discourages transit usage for neighborhood residents, and the decentralizing of activity makes it less attractive as a transit destination. Together these conditions have a negative impact on VMT reduction efforts, and, therefore, the lack of a fulsome analysis of bonus programs in the PEIR likely overestimates the VMT reductions that will be realized by the plans, including casting doubt on the assumptions of the Village Propensity Map.

The Bonus ADU program has an even greater negative impact on VMT reduction because it is most attractive economically on parcels that are more than one-half mile from transit stops. This is a result of San Diego's parcels being larger (and hence supporting more ADUs) as the distance from transit corridors increases. These lots are more likely to be in high fire hazard zones. Numerous studies show that transit usage drops off substantially beyond one-half mile walking distance (one-quarter mile for bus service), yet Bonus ADU developments are most often located beyond one-half mile and hence reinforce automobile use for their residents.

It is important to emphasize that transit usage in San Diego is suppressed by the city's average population density (see Figure 1), and that no amount of transit buildout will make it viable and efficient for the vast majority of San Diegans to utilize fixed-route transit networks (bus and rail) for commuting to work or in other daily activities. With each successive decrease in the estimate of San Diego's population growth, it is clear that San Diego should be compressing the footprint of future development so that community

villages can achieve critical densities necessary to become viable neighborhood centers and transit destinations. This requires a horizontal form of development, not the scattered highrises produced under CCHS. This is particularly true when developments are built without parking, and without local amenities, so that a zone of exclusion is needed around the development to absorb the residents' automobiles.

Figure 1. Population Density Determines Transit Adoption



In conclusion, Neighbors For A Better San Diego recommends against acceptance of the Blueprint, University, and Uptown PEIR because the impacts of bonus development programs, resulting from the total capacity for new units and the dispersion of developments, have not been considered.

Respectfully,

Geoffrey Hueter, Ph.D.
 Chair, Neighbors For A Better San Diego

John Ziebarth
1435 Alexandria Drive
San Diego, CA 92107
April 19, 2023

City of San Diego Planning Department
9485 Aero Dr
San Diego, CA 92123

Re: Second Draft University City Community Plan Update Comments

Dear Planner:

Though the second draft of the University City Community Plan Update includes some positive refinements, it fails to address the two key issues raised in comments on the first draft. Those were 1. requirement in CPIOZ to create *urban public space* (i.e., public park space) on private property and 2. Requirement in CPIOZ for private property owners to maintain and be liable for these so-called “public park space” on private property.

The term *urban public space* does not exist in the San Diego Municipal Code, because it has never been required anywhere in the city before. None of the community plan updates over the last decade have required *urban public space*. When the CC-3-9 zone was developed to accommodate 109 du/ac in association with the North Park Community Plan, there was no requirement for *urban public space*. Neither the EMX nor RMX mixed use zones created a requirement for *urban public spaces*. What is unique about University City that this term should be created and required there? This is completely unprecedented in San Diego. Not only is it unprecedented in the City of San Diego, it is unprecedented in the country at the level that the Update prescribes. I have found only three cities in the country that have regulations for “privately owned public space.” New York City which provides incentives for office buildings by offering intensity bonus floor area if outdoor plazas and open space is created. San Francisco in their downtown area require 1 to 2 % of the net developable area be privately owned public space. And they exempt retail, institutional, and residential development from the requirement. The third city is Seattle which is identified as an inspiration example in the Update and is discussed below.

A. The Update page 66 identified Seattle South Lake Union District as an example of *urban public space*. Regulations were developed in South Lake Union to address the home of Amazon’s corporate headquarters with approximately 8 high-rise office buildings. The Seattle Municipal Code 23.48.250 requires **private open space** for the offices at a ratio of 2% of the office space (gross leasable area not the developable or gross floor area). The private open space is required when

1. *The project is on a lot located in an SM-SLU zone that has a height limit for **non-residential** uses that exceeds 100 feet; and*
2. *The project includes 85,000 or more square feet of gross floor area in office use.*



Seattle in this office district requires only 3,000 sf of off-site public open space with an easement or pay an in-lieu fee (such as an in-lieu park fee). This is all that is required for a public open space, even for a 300,000+ sf office building 12 stories high.



B. The Update page 69 identifies Houston Center as an example of *urban public space*. I could find no reference in the Houston Municipal Code to *urban public space* requirements nor easement requirements.



The Commons at Calabasas, CA



Americana @ Brand in Glendale, CA



Excelsior in Glendale, CA



Santana Row in San Jose, CA

C. If you look at life-style centers and mixed-use developments with their public gathering spaces such as have been developed by Caruso or Santana Row (see above), these are not required by zoning or community plans nor are public easements required.



University Town Center



4350 & 4370 La Jolla Village Drive

D. Neither gathering spaces at University Town Center nor across the street at 4350 and 4370 La Jolla Village Drive were required by code. Nor were public easements required.

Conclusion: There is no historical basis for on-site *urban public spaces* requirements as specified in the Update on private property nor *public easement* requirements for *urban public spaces* on private properties elsewhere in the municipal code, the city, or in other jurisdictions.

Examples of other developments raise the question whether there is a need for this additional layer of regulations. The city wants to encourage redevelopment. These overly specific development regulations associated with *urban public spaces* combined with the public easement requirement will be a strong discouragement to redevelopment. I strongly recommend eliminating the *urban public space* requirements and *public easement requirement* or model it more after the Seattle version for South Lake Union which was intended for major office development creating private open space (at much lower percentage) and easements for off-site public open space.

Recommendations:

1. Change the term from *urban public space* to *urban open space*. The city should not be requiring “public parks” on private land. But requiring “open space” in projects is a positive. Use refined SDRs to create open space in projects.
2. Delete the requirement for an easement. The illustrations above demonstrate that the easements are not necessary. Easements required in the first phase of a project could hamper redevelopment and implementation of the subsequent phases. It is extremely difficult to remove or change an easement.
3. The threshold for requiring open space is too low. Look at the threshold established in Seattle as an example. Currently, proposed thresholds can create an economic burden on smaller projects which disincentivizes redevelopment. As reflected in New York, San Francisco, and Seattle, exempt retail, institutional, and residential development areas from the requirements.
4. The percentage of premises or development area is too high. How many 1,250 sf plazas or 3,000 sf podiums or 3,000 sf urban greens would you need to satisfy a requirement for 30,000 sf or 50,000 sf of required *urban public space*? Imagine the amount of dedicated *urban public space* with public easements that would be required for University Town Center. They have already provided *urban open space without easements*. Look again at the requirement established for South Lake Union in Seattle and San Francisco which is 1 to 2%. The draft Update is 2 ½ times the requirement in Seattle, which was written to address one district which houses the Amazon corporate high-rise offices.

Respectfully,

John C Ziebarth

Role of the Public Realm: The community's development fabric is composed of two distinct, yet inter-related components: the "public" realm and the "private" realm. The "public realm" consists primarily of the publicly-owned street rights-of-way and other publicly accessible open spaces such as parks, squares, plazas, courtyards, and alleys. The "private realm" consists of privately-owned areas in large part developed with buildings and associated improvements, and is more limited in its accessibility to the public.

– San Diego, CA

Urban Design: Role of the Public Realm

https://www.sandiego.gov/sites/default/files/legacy/planning/community/profiles/uptown/pdf/4_3_streets_the_public_realm.pdf, accessed July 26, 2019.

If urban public spaces are going to be required as part of CPIOZ, then the following evaluation of the requirements should be taken into consideration:

A. Public Space

SDR-A.1. Required Public Spaces.

Public spaces shall be required with the following amenities, and in accordance with SDR-A.2:

1. Development on a premises equal to or greater than 400,000 square feet shall provide public spaces that include at least 6 amenities identified in Table 2.

Recommendation: Should include 4 amenities. Why the jump from 3 amenities to 6 amenities.

2. Development on a premises equal to or greater than 200,000 square feet, but less than 400,000 square feet shall provide public spaces that includes at least 3 amenities identified in Table 2.
3. Development on a premises equal to or greater than 100,000 square feet, but less than 200,000 square feet shall provide at least 2 amenities identified in Table 2.
4. Development on a premises equal to or greater than 25,000 square feet, but less than 100,000 square feet shall provide at least 1 of the amenities identified in Table 2.

Recommendation: Delete requirement for less than 100,000 square feet.

SDR-A.2

1. Public Space

Question: Why was *paseo* eliminated as an option for a public space?

Requirement:

a. plaza

i. Minimum area of 1,250 sf

ii. The minimum length and width shall be 20 feet; and

Question: Minimum required patio area required is 1,250 sf. If the minimum width and length is 20 feet by 20 feet, then could three plazas consisting of two 400 sf plazas and a 450-sf plaza satisfy the requirement? This is practical and could be supportable.

iii. Must be in front yard or street side yard (See Figure 36)

Question: Why does the plaza have to be in the front or street side yard? This was discussed and rejected as part of the development of EMX and RMX mixed-use zoning. Even building transparency

along the streets was replaced with building articulation. A good example of why this should be the case was Americana at Brand.



An internal horseshoe shaped private street is in the middle of the block with wonderful open space, but the street walls around the perimeter streets of the block are generally windowless walls that have been articulated. It is important to have an open space near building activities that will activate the plaza.



Colorado St. & Central Ave at Americana @ Brand w/ fake windows and doors for building articulation along the surrounding streets

b. podium

i. Minimum of 3,000 sf

iii. Pedestrian Access shall be provided from the ground level.

Question: Could this pedestrian access be internal to the structure and lockable after hours? Will a developer who creates a podium for the residents simply not use this as a public space because of the liability issue? Look at how the podiums in the CC-3-9 zones along El Cajon Blvd are utilized for private access.



Podium-El Cajon Blvd-CC-3-9 -no public access

c. platform

- ii. *At least one pedestrian connection shall be provided between an elevated light rail station and the adjacent development if the development is adjacent to the elevated light rail system.*

Response: This makes sense to have a pedestrian connection to an elevated light rail.

d. Promenade

Question: i. why does the promenade need to be along a street (especially a busy street?) Why can't a promenade be interior to the development with the development articulating and activating the promenade? Per SDR-A2 Promenade Illustrated on page 217 indicates that the promenade can include the public right of way. Yet, page 190 says that the 20' is measured from the parkway. Which is correct?

Question: What is the difference between Paseo and Promenade?

e. Urban Green

Question: Per Illustration page 218, the *urban green* area can include hardscape so that the surface of usable turf could be less than 30' in width and less than 3,000 sf. (Is that correct?)

- i. *3,000 sf? Yet minimum Multipurpose Turf Area in Table 2 is 10,000 sf*
- ii. *30' minimum length and width?*

2. *Adjacent Building Façade. A minimum of one building façade shall face the public space (agree that a building façade shall face space) with the following:*

- a. *A minimum of 60 percent of the street wall area on the ground floor shall be transparent, with clear glass visible for commercial or residential uses.*

Question 1: Why not use the same methodology for transparency as is currently in the municipal code? Since code for CC-3 zones and mixed-use zones already address building articulation this SDR is redundant and unnecessary.

Question 2: Why does the public space need to be between the street wall and the street? Especially for podiums, platforms, and promenades. Why can't these public spaces be internal to a center?

Comment: Central Ave and Colorado Street at Americana & Brand (shown above) would not meet this transparency requirement.

- c. *Upper stories of a building with a finish floor elevation of more than 25 feet above the public space may have balconies or building elements that*

project over the public space. Any upper-story projections shall be set back a minimum of 10 feet from the property line

Question: Why must the upper story projection be setback 10' if the building setback along the street is 0'?

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.*

Question: As pointed out in the executive summary above, neither Seattle Lake Union District nor Houston Center cited as examples in the Update require 5 percent to 15 percent urban public spaces. The Seattle Municipal Code 23.48.250 requires **private** open space for the offices at a ratio of 2% of the office space (gross leasable area). Residential does not have an open space requirement. San Francisco's downtown requires 1-2% and exempts retail, institutional, and residential from the requirement. Houston does not have an open space requirement. Further, any percentage should be based on net new developable building area. Basing it on gross is disincentive for redevelopment.

Below are several examples of the project impact to comply. What is the economic impact on a redevelopment to provide this large amount of *urban public space*? Is the impact such that it will discourage redevelopment.

Example A: 10 story steel building with 300,000 square feet on 60,000 square foot premises. Five percent of 300,000 square feet development would be 15,000 square feet while 5% of a 60,000-sf premise would be 3,000 square feet. Yet a 15% cap for *urban public space* would only require 9,000 sf.

Example B: 5 story wood frame building (an optimal economic construction type with of 250,000 square feet on 60,000 square foot premise would still require 15,000 square feet of public space while 5% of 60,000 sf premise would be 3,000 square feet. The building area is lowered based on the buildable premise area of 60,000 square feet must be reduced by 9,000 square feet of *urban public space*.

Example C: 2 story commercial story development with 60,000 square feet of development is required 3,000 square feet of *urban public space*. What is the economic impact on the lower-level development when the additional *urban public space* causes the construction of expensive parking structures? Does this create a disincentive to redevelop?

Example D: 10-acre premises 435,600 sf with 300,000 sf of residential and 100,000 sf of commercial for a total of 400,000 sf of development. Proposed CPIOZ would require 21,780 sf based on 5% of premises or 20,000 sf based on 5% of developable area. The 20,000 sf of *urban public space* would equate to sixteen

1,250 sf plazas or over six 3,000 sf urban green spaces to put the area into perspective. Is this a reasonable requirement?

Thus, the city is encouraging higher buildings which are more expensive to build. These regulations need some refinement when analyzing their impacts.

6. *Street Frontage. A minimum of 20 percent of the public space perimeter shall front a public right-of way or privately maintained street open to the public and shall not be obstructed by a structure.*

Question: Why does public urban space need to front a busy public street instead of being internal in the center with pedestrian connection to the public right of way? This was analyzed and rejected as part of the development of the mixed-use zoning regulations.

Examples of South Lake Union development in Seattle for the Amazon Complex of offices that illustrate street frontage issue:

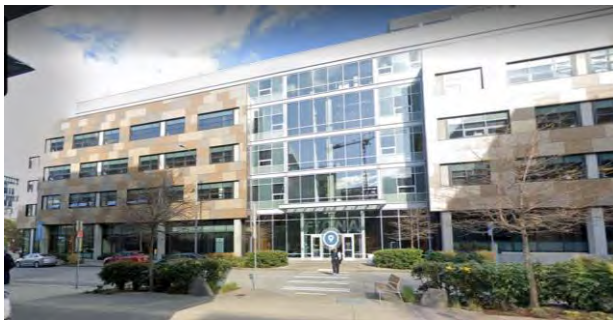
Amazon Fiona (500 Boren Ave N), Rufus (551 Terry Ave N) and Obidos (551 Boren Ave N) Complex was developed as a campus of 690,000 sf on 2.8 acres. First three photos show no public urban space along street frontage.



Amazon Rufus, corner of Republican & Terry, Seattle



Amazon Obidos, corner of Mercer &



Amazon Fiona on Boren Ave opposite Obidos



Plaza/ Paseo interconnecting Amazon Rufus, Obidos, and Fiona complex runs between Rufus and Obidos and not along street frontage. Connection to Fiona is mid-block with no traffic signal.

7. Public Access.

- a. *The applicant shall record a public recreation easement against all parcels comprising the premises of the development, to the satisfaction of the City Manager, for all portions of the public space not within the public right-of-way to allow for public access and use.*

Question: Do any of the plazas outside the office buildings downtown have public easements? The illustrations used in the community plan such as the Amazon building on Union Street in Seattle or the Houston Center for on-site public spaces. There are no public easements for these illustrated projects. Are there public easements for the current plazas for office buildings in University City or the University City Town Center? If not, then why are these easements necessary?

- b. *The public space shall be open and accessible to the public from at least 8:00 a.m. to 8:00 p.m. year-round or during hours of business operation.*
 - c. *A minimum of 1 wayfinding sign shall be provided per 200 feet of street frontage. The sign(s) shall be at least 2 square feet in size, shall be located along and legible from the public right-of-way, shall advise the public of the hours of public access, and shall direct the public to any public spaces not located adjacent to a public right-of-way.*
8. *Maintenance. Public spaces shall be maintained by the property owner.*

Comment: City requires the dedication of public easement (effectively creating a public park on private land) without assuming any maintenance or liability on the easement they require.

9. Landscaping.

a. *A minimum of one, 24-inch box canopy street tree is required for each 25 feet of street frontage;*

Comment: SDMC 142.0409(a)(1)(A) is based on an average of 30 feet on center for canopy trees. Why is 25' spacing selected? This SDR is redundant and unnecessary. Municipal Code already addresses it.

b. *A minimum of 20 percent of the public space area shall be comprised of landscaping;*

Question: How was 20% selected when illustrations in the plan like South Lake Union page 66 and 67 or illustration of the plazas on pages 68 and 69 shows some nice tree placements but not 20% of the plaza area?

c. *The public space shall include landscape designs that provide viewable surveillance, including visibility from the abutting building and parkway;*

Question: How is a podium or platform visible from the public right-of-way? Suggest inserting "or" in "abutting building and / **or** parkway."

d. *At least 30 percent of all paving within the public space shall be shaded by tree canopy. The shade coverage of a tree shall be determined by the expected canopy at 10-year maturity.*

Question: Is the city going to require a shade analysis exhibit as part of the building permit process? How does this apply to "promenades" or covered plazas such as in SDR-A1 which appears to be excluded from landscaping.

10. *Design.*

b. *Seating shall be provided at a minimum of at least one linear foot for every 100 square feet of public space;*

Question: Why is seating at this ratio required for an *urban green space*? Should seating requirements not depend on the type of space that is being created?

SDR-A.5 Public Space in Lieu Fee Option

Comment: *Urban public space* should be considered equivalent to public park space. Fiscal Year 2024 Planning Department Fee and Deposit Schedule already includes a Park DIF fee. It seems that the applicant is being asked by the city to provide an *urban public space* and pay a Park DIF or pay an in-lieu fee for the urban public space and pay a Park DIF. Seems like the city is requiring the Applicant to pay double which is unreasonable. There should be a credit towards the park fee or vice-a-versa.

B. *Pedestrian Connectivity*

SDR-B.1 Pedestrian Connectivity.

1. *Development located on a premises equal to or greater than 25,000 square feet shall provide at least one or more pedestrian features, which shall be satisfied through the provision the following:*

- a. *A paseo shall be continuous, clear of obstructions and shall have a minimum width of 20 feet. (See Figure 41)*

Question 1: Where is Figure 41? Last Figure I found was Figure 36.



Paseo from Girard to Prospect in La Jolla-12' wide

Question 2: Why 20' minimum width. The existing paseo from Girard to Prospect in La Jolla is only 12' wide. Previous comments on the last previous draft plan raised questions and provided illustrations regarding the width of paseos and pedestrian connections.

4. *For premises fronting more than 3 public or privately maintained streets, a pedestrian path shall connect to at least three streets. A paseo connecting at least two public or privately maintained streets shall satisfy this requirement.*

Question: ADA and the code require pedestrian connection from public right of way. Why are privately maintained streets included? Code already addresses pedestrian connections. Again redundant and unnecessary.

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.

Question: Is this 100,000 square feet of development area or premises?

Comment: This should be a combined minimum area of 30,000 square feet of gross floor area for food, beverage and/or grocery use. This could be difficult to achieve depending on market conditions. Grocery use is not always available. Restaurant uses typically occupy 10 to 20 percent of a shopping center.

E. *Street Trees SDR-E.1: Urban Parkway Street Trees. A minimum of one, 24-inch box canopy street tree is required for each 25 feet of street frontage within the furnishing zone of the urban parkway.*

Question: Why does the plan call for 25 feet on center when the SDMC 142.0409(a)(1)(A) is based on an average of 30 feet on center for canopy trees. It also excludes driveways from the calculation of the length of the property. Again, SDR is redundant and unnecessary.

One of the purposes of the 2000 Land Development Code was to eliminate these kinds of discrepancies. Community Plans are policy documents. If a regulation needs to be refined or updated it should be changed in the zoning regulations and evaluated on whether it should be changed city wide. The closer tree spacing causes a practical problem sometimes getting utilities onto a site due to utility separations and separations of utilities from landscaping

Final Question regarding implementation:

What is the urban public space requirement for partial or phased redevelopment of existing developments which will become previously conforming when the rezoning is done to implement this plan? How will this be implemented?

Urban public spaces should not be required nor public easements for them. The City should be looking at how to promote “urban outdoor space.” The required area as a percentage of the project should be reduced. The SDRs should be examined to see how they could be integrated into the zoning code and not as regulations in a policy document like a community plan update. If *urban public spaces* are required, then it is critical that the level of specificity and requirements are practical so that they do not discourage redevelopment.



May 29, 2024

Attn: Planning Commission of the City of San Diego

Re: May 30, 2024 Hearing
University Community Plan Update; Agenda Item #3; Comments in Opposition

Help Save UC is a volunteer community group participating in the University Community Plan Update process. This letter is to submit comments in opposition to Agenda Item #3 to be heard by the Planning Commission on May 30, 2024.

Vote “No” on University Community Plan Update

Help Save UC asks for the Planning Commission to vote “No” on the City of San Diego Planning Department’s request to recommend the University Community Plan Update for approval. Help Save UC understands the need for more housing, but does not support the Plan’s vision of scores of high rises throughout the community. On April 27, 2024, Help Save UC submitted written comments on the Plan Update. These comments are attached to this letter as Exhibit A. Help Save UC requests that the Planning Commission approve the proposed University Plan Update only if these comments are incorporated into the Plan.

Help Save UC Requests Modifications to Plan Update

Specifically, Help Save UC requests the following modifications:

1. For the commercial property called University Square on Governor Drive
 - a. The height limit should be reduced from 100 ft to 50 ft
 - b. The density should be limited to 54 du/acre
 - c. Rear and side setbacks should be increased from 20 ft to 30 ft

2. For the commercial property called UC Marketplace on Governor Drive
 - a. The height limit should be reduced from 100 ft to 40 ft
 - b. The density should be limited to 29 du/acre
 - c. Rear and side setbacks should be increased from 20 ft to 30 ft

3. For both locations:
 - a. A minimum of 80% of built, ground floor square footage must be community-serving retail
 - b. Onsite parking must be provided for both future residents and commercial users, including a minimum of one parking space per dwelling on site.

Exempt UC from Complete Communities

Additionally, Help Save UC requests that the Planning Commission only consider approving the Plan Update if the University Community area is exempted from the Complete Communities program. The City and community have spent years putting this Plan Update together. For the Plan to have any meaning or accuracy, densities should not be increased further by the Complete Communities program. With the Plan Update in place, which will increase housing by more than 75%, there is no need for this program.

Vote “No” on Draft Program EIR

With respect to the Draft Program Environmental Impact Report for the University Plan Update, Help Save UC requests that the Planning Commission vote “No” on the Planning Department’s request to recommend the Draft Program EIR for approval. On April 25, 2024, Help Save UC submitted written comments on the Draft Program EIR. These comments are attached to this letter as Exhibit B.

As discussed in these comments, the Draft EIR inadequately evaluated the environmental impact of adding 30,000 new housing units (more than doubling the community’s population) to the community. The City’s determination that the “high density” alternative is the preferred scenario violates CEQA because the City admits that the “high density” alternative is not feasible and contradicts the City’s own findings in Section 8.2.3 that the high density alternative would have greater impacts than the Project.

Finally, despite the City’s written promise in the April 2023 Plan Discussion Draft that the City would consider the lower density Community Preferred Plan Update Scenario in the environmental review process, the Draft EIR that the City asks the Planning Commission to approve does not include this scenario. The City has since verbally stated that it will include this scenario in the final EIR. This body should not approve this incomplete EIR when the Community Preferred Scenario, which proposes a slightly less dense alternative (adding approximately 22,000 new housing units) and will most

certainly have a lesser impact on the environment, has not yet been presented but will be evaluated in a future document.

For these reasons, and those detailed in the attached exhibits, Help Save UC requests that the Planning Commission only approve the Plan Update if a) the modest community requests in the attached comments are incorporated and b) the University area is exempted from the Complete Communities program. Help Save UC also requests that the Planning Commission not approve the Draft Program EIR, and wait until all alternatives are properly presented in the Final EIR.

Thank you for your consideration of this community input.

Sincerely,

Members of Help Save UC, including

Andrew Barton
Linda Beresford
Linda Bernstein
Paul Goldstein
Pablo Lanatta
Jennifer Martin-Roff
Nancy Powell
Thomas Pushpathadam
Suzy Shamsky

cc: Mayor Todd Gloria
Councilmember Joe LaCava
Councilmember Kent Lee
Coby Tomlins
Nathen Causman
Chris Nielsen
Andy Wiese

APPENDIX A



April 27, 2024

Dear Ms. Lukes,

Help Save UC is a volunteer community group participating in the University Community Plan Update process. This letter is our response to the March 2024 Second Draft of the University Community Plan. We have previously submitted detailed comments to the City of San Diego at several stages of the Plan Update process, including our May 4th, 2023 comment letter responding to the Community Discussion Draft (attached for reference). The University Community Plan Update Subcommittee and the University Community Planning Group (UCPG) adopted most of our recommendations in that May 4th, 2023 response, and they recommended that the City incorporate these recommendations into the Plan Update.

We have closely studied the March 2024 Second Draft. Most of the requests we made in our response to the Discussion Draft were not incorporated into the Second Draft. We feel strongly that these changes to the Second Draft must be made, and so we are reiterating changes we requested to the Discussion Draft.

The 2020 community survey presented a vision of the community that added moderate housing while preserving local retail, with buildings at community shopping centers of approximately 40 feet high. Since then, successive plan drafts have increased the proposed density and height limits. New density bonuses have gone even further, with impacts that aren't being measured, public input not needed, and contributions to impact fees reduced.

Help Save UC supports moderate growth, and our suggestions attempt to reduce the adverse impacts of redevelopment at our neighborhood retail centers. However, we are certain that the University community cannot handle the City's proposed plan, which will more than double the existing population with no additional parks, schools or any guarantee of transportation upgrades or increased emergency services.

The following are Help Save UC's comments on the March 2024 Second Draft of the University Community Plan Update.

LOT-SPECIFIC COMMENTS

We request that the following guidelines be applied to these specific commercial lots:

1. For **UC Marketplace**, aka “Sprouts Shopping Center” (located at the northeast corner of Regents Road and Governor Drive,):

- a. The maximum density must be no more than 29 dwelling units per acre (DU/AC).
- b. The parcel must have a 40-foot height limit (not 100’ as allowed by the proposed CC-3-8) due to its close proximity to one- and two-story houses.
- c. Rear and side setbacks abutting residential uses must be a minimum of 30 feet. SDR-C.1 setbacks must be revised from 20 to 30 feet.
- d. A minimum of 80% of built, ground floor square footage shall be community-serving retail. See revised SDR-H.1-2 below.

2. For **University Square**, aka “Vons Shopping Center” (located at the southeast corner of Genesee Avenue and Governor Drive):

- a. The maximum density must be no more than 54 DU/AC.
- b. The parcel must have a 50-foot height limit (not 100’ as allowed by the proposed CC-3-8 zoning) due to its close proximity to two-story apartments and one- and two-story houses nearby.
- c. Rear and side setbacks abutting residential uses must be a minimum of 30 feet. SDR-C.1 setbacks must be revised from 20 to 30 feet.
- d. A minimum of 80% of built, ground floor square footage shall be community serving retail. See revised SDR-H.1-2 below.

3. **Parking requirements** for UC Marketplace (Sprouts) and University Square (Vons):

- a. Onsite parking must be provided for both future residents and commercial users.
- b. The current number of commercial parking spots must be maintained at each center (as a minimum).
- c. A minimum of one parking space per dwelling unit must be required on site.

4. For the four commercial properties (gas stations) on the corners of Genesee Avenue and Governor Drive, along with the Chase Bank and Carl’s Jr. properties located on the south side of Governor Drive east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive (Outcast Grill and offices/retail):

- a. The maximum density must be no more than 29 DU/AC.
- b. Current height limits for these parcels must be retained; there should be no increase in height. These lots are in close proximity to one- and two-story residential structures.

- c. Rear and side setbacks abutting residential uses must be a minimum of 30 feet. SDR-C.1 setbacks must be revised from 20 to 30 feet.
- d. A minimum of 80% of built, ground floor square footage shall be community serving retail. See revised SDR-H.1-2 below.

Our preference for all of these commercial properties would be a land use designation that prioritizes retaining essential community-serving commercial use, with residential as the secondary use, and maintains the development regulations listed above. We note that both old and new land-use designations appear in the drafts, but they are only partially defined, making it difficult to translate our requests to specific Blueprint San Diego Land Use Categories (e.g., Community Commercial Low 4) or existing zones (e.g., CC-3-8). Given the drastic changes proposed here and throughout the City of San Diego, the City should develop new zoning designations as needed for specific areas to reflect these needs.

COMMUNITY PLAN IMPLEMENTATION OVERLAY ZONE SUPPLEMENTAL DEVELOPMENT REGULATIONS:

We request that the following changes be made to specific Supplemental Development Regulations (SDRs).

SDR-A.2 Required Public Spaces Regulations:

The SDRs as written allow for developments to include public space that is not truly public. These developer-provided spaces are particularly important to the community as the Parks Master Plan does not itself include adequate parks for the growth in population made possible by the Community Plan. We request changes as follows:

- a. SDR-A.2.3 should read “Size. A minimum of **10** percent of the premises or **10** 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 **25** percent of the premises.”
- b. SDR-A.2.7a should read: “The applicant shall record a public recreation easement against all parcels comprising the premises of the development, to the satisfaction of the City Manager, for all portions of the public space not within the public right-of-way to allow for public access and use. ***Fees or membership may not be required to access public spaces.***”
- c. SDR-A.2.7b should read: “The public space shall be open and accessible to the public from at least 7:00 a.m. to 9:00 p.m. year-round.”

- d. SDR-A.2.10c should read: “**100** percent of the public space shall be free of physical barriers or obstructions to ensure universal access;”
- e. SDR.A.5, which allows a public space in lieu payment, should be eliminated.

SDR-C1 Building Transition - Residential:

- a. SDR-C1.1 should read “A **45**-degree angle transition plane shall start at a point 30 feet above the finished grade;”
- b. SDR-C.1.2 should read “The building shall be setback **30** feet from the side or rear yard property line that abuts lower density residential zoned property;”

SDR-C2 Building Transition - Open Space:

- a. SDR-C2.1 should read “A **45**-degree angle transition plane shall start at a point 30 feet above the finished grade;”
- b. SDR-C2.2 should read “The building shall be setback **50** feet from the side or rear yard property line that abuts open space zoned property;”
- c. An SDR should be added, as in the previous draft, that reads: “Orient short axis of buildings towards open space.” (HSUC notes that this SDR was in a previous Plan Update but was deleted.)

SDR-H.1 Community Serving Retail (Smaller Sites) and SDR-H.2 Community Serving Retail (Larger Sites):

SDRs for small and large sites pertaining to retention of community-serving retail in properties designated as Community Village should be revised to state:

“Development on a property designated “Community Village” in the University Community Planning Area shall maintain a minimum of 80% of ground floor building area for post offices, pharmacies, community-serving retail, food, beverage, and grocery use.”

PLAN POLICIES:

It is unclear why this draft removes the stronger language needed to protect existing residents and the environment, and instead incorporates vague and discretionary language. This occurs throughout the Plan Policies and Help Save UC recommends that the City use stronger language.

We request that the following changes be made to the Table with Plan Policies.

Plan Policy 1.1 should add a Policy 1.1J that states, “Encourage affordable and inclusive housing options, especially on-site options, within mixed-use developments.”

Plan Policy 1.2B should be changed from, “Focus higher density housing opportunities near public transit, job centers, and within Sustainable Development Areas” to “Focus higher density housing opportunities near public transit, job centers, and within one-half-mile walking distance of existing major transit stops.”

Plan Policy 1.2H should be modified as follows (new language shown by underline): “Support the development of housing that is affordable to and meets the needs of the employees in the University Community to attract employees, support reduced commute times, increase active transportation, and minimize transportation costs, but ensure it is also protective of surrounding neighborhoods and incorporates on-site parking to minimize impacts on surrounding neighborhoods.”

Plan Policy 2.2 should add a **Policy 2.2J** that states, “All new residential projects must incorporate recreational outdoor space proportional to the size of the project as part of base zoning (not as part of a density bonus).”

Plan Policy 2.4C should be modified as follows (new language shown by underline): “~~Promote attenuating~~ Attenuate noise through the use of berms, planting, setbacks and architectural design rather than with conventional wall barriers for developments next to transit, trolley, highways or other potential noise-generating uses. Attenuate noise from new residential or commercial projects sited next to existing residential homes with setbacks, non-conventional uses as described in the prior sentence, and with conventional wall barriers if necessary.”

Similarly, **Plan Policy 2.4D** should be modified as follows (new language shown by underline): “~~Encourage~~ Require open spaces, such as pedestrian plazas, paseos, greenways and courtyards, that serve dual functions as valuable community space and buffers between different uses.”

Plan Policy 2.9 should add a **Policy 2.9F** that states, “Development adjacent to open spaces, MSCP, parks or canyons should be limited as native ecosystems are sensitive to light, noise pollution, and increased human traffic.”

Plan Policy 2.10 should add a **Policy 2.10F** that states, “Ensure that new projects sited next to existing residential uses provide sufficient parking to ensure no impacts to adjacent residential communities from new residents or commercial visitors.”

Plan Policy 2.11 should add a **Policy 2.11E** that states, “New projects should ensure that lighting does not impact adjacent residential uses and open spaces.”

Affordable & Inclusive Housing In All UC Design Districts

Plan Policy 2.19C, which states, “Encourage affordable and inclusive housing options within mixed-use developments” should be added to all areas of the Plan Update; that is, this policy, which currently only appears in the Plan Policies for the South University Neighborhood Design District, should also be added to the Plan Policies for the North Torrey Pines Design District, Campus Point & Towne Centre Design District, University Towne Centre Design District, Nobel/Campus Design District, and the Miramar Design District. It is shocking that the only Plan Policy specifically encouraging affordable and inclusive housing is located **only** in a District that is one of the farthest from significant transportation and has the lowest number of employment opportunities. It would certainly seem to make sense to add this Plan Policy to other Districts that have more significant transportation and employment opportunities, especially those near biotech firms whose representatives have verbally stated that they support housing for all.

GENERAL COMMENTS

- A. Help Save UC still believes that the total amount of increased density proposed (more than doubling the population in this one community) is unreasonable. The proposed density in the entire plan should be reduced, and housing units should be placed throughout the City of San Diego. University City is already the second densest community in the City of San Diego (second only to downtown) and the area’s infrastructure, park space, emergency services and other amenities cannot support two to three times as many people.
- B. It is difficult to understand what will be the true final impact of complete build-out given the City’s multiple “density bonus” programs, incorporation of Complete Communities, additional building options for Sustainable Development Areas, and/or ADUs. The City is adopting so many different building options, a person could not read this plan and have any idea of what this community could look like

in 30 years. Omitting the impact of these bonus programs from the plan and EIR is a mistake.

- C. Focusing on high density at all locations reduces the likelihood of development of two- and three-bedroom apartments, which are critically important to provide housing options for families. The City should specifically provide lower density levels at certain locations, such as the UC Marketplace and University Square, to facilitate this type of family housing.
- D. The latest draft of the plan transitions from existing zoning designations to new zoning uses that are partially described in the Blueprint SD draft. The new designations are incomplete, with restrictions like setbacks being worked out in the community plans. In our community commercial lots we are unable to recommend alternatives with lower densities when critical metrics like setbacks are undefined.
- E. The Plan provides very little additional park space. The amount of density proposed will overwhelm existing parks and will have a negative impact on our canyons and open spaces. The City is adopting a new points system which, to our knowledge, has never been used by any other governmental entity. The latest draft recognizes a parks deficit with the new point system but provides no direction to reduce it in this plan. Parks point totals for the community should match guidelines specified in the San Diego Parks Master Plan.
- F. The Plan is extremely reliant on the development of increased future transit by MTS, and the improvement of roads and other transit uses. However, the City has no guarantee that any of these accommodations will occur. This Plan allows for significant development, but no actual infrastructure support.

Thank you for your consideration of these comments. We sincerely hope to see that the City will consider public input and adjust the Draft Plan accordingly.

Sincerely,

Members of Help Save UC, including

Andrew Barton
Linda Beresford
Linda Bernstein
Paul Goldstein
Pablo Lanatta
Jennifer Martin-Roff
Nancy Powell
Thomas Pushpathadam
Suzy Shamsky

cc: Mayor Todd Gloria
Councilmember Joe LaCava
Councilmember Kent Lee
Coby Tomlins
Nathen Causman
Chris Nielsen
Andy Wiese

APPENDIX A

**HELP SAVE UC COMMENT LETTER
DATED MAY 4, 2023**



May 4, 2023

Dear Ms. Graham,

Help Save UC is a volunteer community group participating in the University Community Plan Update process. The following are Help Save UC's comments on the Community Discussion Draft for the University Community Plan Update. Please note that these comments are intended to apply to (i.e., to modify) both the City's preferred scenario and the Community Planning Group Subcommittee Input Scenario.

Please note: all page numbers referenced herein are for the print-ready PDF of the Community Discussion Draft.

Lot-Specific Comments

1. For UC Marketplace (located at the northeast corner of Regents Road and Governor Drive):
 - a. The maximum density should be reduced from 73 dwelling units/acre to the current base zone's density of 29 dwelling units/acre.
 - b. The parcel should have a 40-foot height limit (reduced from the 100 feet that was stated at a recent meeting but is not provided in the document).
 - c. Rear and side setbacks abutting residential uses should be a minimum of 30 feet. SDR-7 on page 198 should be modified to add this sentence.
 - d. Community/neighborhood retail services, including but not limited to supermarkets, post offices, etc., must be maintained. The language in Table 6: Plan Policies, #1.2A on p. 170 should be changed from "Redevelopment of existing neighborhood services should consider replacements with a similar or same use" to "Redevelopment of existing neighborhood services must include replacement with a similar or same use." Similarly, the language in Table 6: Plan Policies #2.19A should be changed from "Retain grocery stores on large sites where feasible" to "Grocery stores on large sites must be retained."
 - e. Policy language should be added to encourage new residential units to be focused on the west or south sides of the parcel along Regents Road or Governor Drive, away from existing homes.
 - f. Requested changes regarding parking requirements are discussed in #3 (below).

2. For University Square (located at the southeast corner of Genesee Avenue and Governor Drive):

- a. The maximum density should be reduced from 73 DU/AC to 54 DU/AC.
- b. The parcel should have a 50-foot height limit (reduced from the 100 feet that was stated at a recent meeting but is not provided in the document).
- c. Rear and side setbacks abutting residential uses should be a minimum of 30 feet. SDR-7 on page 198 should be modified to add this sentence.
- d. Community/neighborhood retail services, including but not limited to supermarkets, post offices, etc., must be maintained. The language in Table 6: Plan Policies, #1.2A on p. 170 should be changed from “Redevelopment of existing neighborhood services should consider replacements with a similar or same use” to “Redevelopment of existing neighborhood services must include replacement with a similar or same use.” Similarly, the language in Table 6: Plan Policies #2.19A should be changed from “Retain grocery stores on large sites where feasible” to “Grocery stores on large sites must be retained.”
- e. Requested changes regarding parking requirements are discussed in #3 (below).

3. Parking requirements for both UC Marketplace (Sprouts) and University Square (Vons) should include the following:

- a. Onsite parking for both future residents and commercial users must be provided.
- b. The current number of commercial parking spots at both centers (415 for University Square and 125 for UC Marketplace) must be maintained as a minimum.
- c. A minimum of one parking space per dwelling unit must be required on site.
- d. The language in Table 6: Plan Policies #2.19D should be changed from “Consider unbundled parking to offset development cost and encourage use of alternative transportation modes” to “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.”

4. For the four commercial properties on the corners of Genesee Avenue and Governor Drive, the Chase Bank, Carl’s Jr. properties located on the south side of Governor Drive east of University Square, and the commercial property on the northwest corner of Regents Road and Governor Drive, the Draft Plan should be modified as follows:

- a. The maximum density should be reduced from 73 DU/AC to 29 DU/AC.
- b. Current height limits for these parcels should be retained; there should be no increase in height.
- c. Rear and side setbacks abutting residential uses should be a minimum of 30 feet.
- d. The language in Table 6: Plan Policies #2.19D should be changed from “Consider unbundled parking to offset development cost and encourage use of alternative transportation modes” to “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.

Table 6 Plan Policies

5. Table 6: Plan Policies #1.1B should be changed from “Concentrate the development of higher density housing in University near public transit, job centers, and within Sustainable Development Areas” to “Concentrate the development of higher density housing in University to the areas within one-half mile walking distance of existing major transit stops.”
6. Table 6: Plan Policies #1.1C should be eliminated. Regulations allowing for ADUs currently exist. Given the overall amount of increased density and number of residents, this statement is unnecessary.
7. Table 6: Plan Policies Section 1.1 and Section 1.2 should add a letter G that states: “For existing shopping centers in all plan focus areas that provide community-serving retail such as grocery stores, pharmacies, post offices, restaurants and similar services, parcels will be zoned to require that community-serving retail remains, with housing added as a secondary use.”
8. Table 6: Plan Policies #1.7K should be modified as follows (new language shown by underline): “Encourage the development of housing that is affordable to and meets the diverse needs of the employees in University to attract employees, support reduced commute times, increase active transportation, and minimize transportation costs, but ensure it is also protective of surrounding neighborhoods and incorporates on-site parking to minimize impacts on surrounding neighborhoods.”
9. Table 6: Plan Policies #2.4C should be modified as follows (new language shown by underline): “Attenuate noise through the use of berms, planting, setbacks and architectural design rather than with conventional wall barriers for developments next to transit, trolley, highways or other potential noise-generating uses. Attenuate noise from new residential or commercial projects sited next to existing residential homes with setbacks, non-conventional uses as described in the prior sentence, and with conventional wall barriers if necessary.”
10. Table 6: Plan Policies #2.4D should be modified to read as, “Require open spaces, such as greenways and courtyards, to serve dual functions as valuable community space and buffers between different uses.”
11. Table 6: Plan Policies #2.9 should add a Policy #2.9E which says, “Development adjacent to open spaces, MSCP, parks or canyons should have limited development, as native ecosystems are sensitive to light and noise pollution and increased human traffic.”
12. Table 6: Plan Policies #2.11 should add a Policy #2.11E which says, “New projects should ensure that lighting does not impact adjacent residential uses.”

13. Table 6: Plan Policies #2.19B should be changed from, “Encourage moderate density mixed-use development opportunities and expand the mix of uses, while maintaining small business character and resident amenities,” to “Consider moderate density mixed-use development opportunities to expand the mix of uses, while ensuring protection of existing small businesses and resident amenities.”

14. Table 6: Plan Policies #3.9 should add a Policy 3.9G which says, “Ensure that new projects sited next to existing residential uses provide sufficient parking to ensure no impacts to adjacent residential communities from new residents or commercial visitors.”

15. Table 6: Plan Policies #4.1 should add a Policy 4.1V which says, “All new residential projects must incorporate recreational outdoor space proportional to the size of the project as part of base zoning (not as part of a density bonus).”

16. Table 4: Planned Roadway Classifications Modifications (p. 113) lists Governor Drive as an existing 4-Ln Major Arterial and states that its Planned Classification Designation is to be a 2-Ln Major Arterial. This road change should be removed, as a second lane is needed to support drop off and pick up activities from Spreckels Elementary, Standley Middle School and Curie Elementary. Furthermore, two lanes will not support the additional traffic likely to occur from doubling the population of the University City Community as proposed by this Plan.

Community Plan Implementation Overlay Zone

17. SDR-19 on pg. 200 should be changed so that sites designated as community commercial, community village, and neighborhood commercial that are 50,000 square feet or more shall maintain a minimum of 25 percent (instead of 10 percent) of the gross floor area for commercial services and retail sales uses. Sites designated as community commercial, community village, and neighborhood commercial with greater than 100,000 square feet shall maintain a minimum of 30,000 square feet (instead of 15,000) of gross floor area for food, beverages and groceries use.

18. SDR-20 Inclusionary Housing Requirement should be modified to require that at least 20% of the total dwelling units in a proposed residential or mixed-use development shall be set aside as affordable to be occupied by very-low-, low-, and moderate-income households. Furthermore, SDR-20 should be revised to state that off-site construction of affordable units or payment of in-lieu fees are not allowed as an alternative method of compliance; on-site construction of units must be required. The City has repeatedly stated that it desires to put housing in the University City area to leverage the new trolley and take advantage of public transportation. It is completely contrary to these goals to allow affordable units to be built off-site in another location. Table 6 #1.1D, 2.19C, and 1.7J-K should be rewritten to require affordable housing, not just to encourage it.

19. SDR-21(c) should be modified to require that all properties adjacent to open space adopt building transition standards as in SDR-7, i.e., a 45° angle above 30'. This change is necessary to reduce visual and environmental impacts on open spaces. Table 6 #2.9A should be changed to be consistent with the suggested changes to SDR-21 above.

20. SDR-24 should be modified to say that, "Freeway-adjacent parcels may only provide a 15-foot upper story setback starting at a height of 50 feet above ground level for the residential building."

21. The Plan should adopt a new zoning requirement for new projects adjacent to residential uses to minimize noise impacts by orienting businesses in the structures away from the existing residences.

General Comments

- A. Help Save UC still believes that the total amount of increased density proposed (to more than double the population in this one community) is unreasonable. The entire plan should incorporate reduced density, and housing units should be placed throughout the city of San Diego. University City is already the second densest community in the city of San Diego (second only to downtown) and the area simply cannot support two to three times as many people.
- B. The Plan provides very little additional park space. The amount of density proposed will overwhelm existing parks and will have a negative impact on our canyons and open spaces. The City is adopting a new points system which, to our knowledge, has never been used by any other governmental entity.
- C. The Plan is extremely reliant on the development of increased future transit by MTS, and the improvement of roads and other transit uses. However, the City has no guarantee that any of these accommodations will occur. This Plan allows for significant development, but no actual infrastructure support.
- D. The Plan itself is extremely difficult to understand and is not accessible to regular members of the public who are not planners or masters of the City's building code. The colors in Figure 3 are very difficult to differentiate. The photographs of different projects are not helpful because they don't identify the DU/acre represented in each project (for example, if an area is proposed to be designated 0-73 DU/acre, does the photograph represent a project at 45 DU/acre or 73 DU/acre?). Furthermore, the Plan does not clearly identify proposed height limits, setbacks or parking requirements, all of which are extremely important pieces to land use and development.
- E. Lastly, it is difficult to understand what will be the true final impact from complete build out given the City's multiple "density bonus" programs, incorporation of

Complete Communities, additional building options for Sustainable Development Areas, and/or ADUs. The City is adopting so many different building options, a person could not read this plan and have any idea of what this community could look like in 30 years.

Thank you for your consideration of these comments. We sincerely hope to see that the City will consider public input and adjust the Draft Plan accordingly.

Sincerely,

Members of Help Save UC, including:

Andrew Barton
Linda Beresford
Linda Bernstein
Pablo Lanatta
Jennifer Martin-Roff
Nancy Powell
Thomas Pushpathadam
Suzy Shamsky

cc: Chris Nielsen
Andy Wiese
Tait Galloway
Mayor Todd Gloria
Councilmember Kent Lee
Dustin Nguyen

APPENDIX B



April 25, 2024

To: planningceqa@sandiego.gov

Re: Comments on the Draft Program Environmental Impact Report for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update – Document issued March 14, 2024

To Whom It May Concern:

The undersigned individuals of the community group Help Save UC submit the following comments on the Draft Program Environmental Impact Report for Blueprint SD Initiative, Hillcrest Focused Plan Amendment to the Uptown Community Plan, and University Community Plan and Local Coastal Program Update Document (hereafter referred to as the “DPEIR”) issued on March 14, 2024 by the City of San Diego (hereafter referred to as the “City”).

1. Combining the Blueprint SD Initiative, Hillcrest Focused Plan Amendment and University Community Plan into one DPEIR was improper.

For reasons not explained in the DPEIR, three totally unrelated planning proposals/updates were combined into one DPEIR. The “Project” as defined in the DPEIR includes:

- A) Blueprint SD, which is a comprehensive amendment to the General Plan that affects the entire City;
- B) the Hillcrest Focused Plan Amendment, which is an amendment to redesignate approximately 380 acres of the Hillcrest and Medical Complex neighborhoods; and
- C) the University Community Plan, which is a comprehensive update to the existing University Community Plan.

While each of these updates involve proposals by the City to increase density, impacts relating to traffic, air quality, biological resources, public services, wildfire, and other areas required a specific analysis of each of the project areas. This did not occur. Instead, the City produced one massive combined document with only a cursory environmental analysis for three highly significant and different projects. This resulted in a document that was cumbersome, overly complicated, three times the length it should have been for any one of the three projects, and clearly designed to discourage the public from engaging in and understanding the project.

First, combining these three projects into one DPEIR resulted in a failure to perform an adequate analysis of any of the three projects. For example, the DPEIR purports to conduct an analysis of 18 separate areas of environmental impact, all of which have subareas, resulting in more than 70 different environmental issues to be analyzed. A comparison of the outcome of the analysis of 70 of these issues reveals that the City reached the same conclusion of environmental impact for all 70 issues for Blueprint SD and the University Plan Update; the Hillcrest Plan Update deviated only once. It is incomprehensible to believe that the results of an environmental analysis for three separate and different projects could be identical on more than 70 issues. This is not analysis by the City; this is a foregone conclusion.

Second, the City attempts to use different variations of Blueprint SD as “alternatives” to the University Plan Update. However, as discussed in Section 6.A below, the Blueprint SD alternatives are not reasonable alternatives for the University Plan Update.

The most telling item is from Section 8.5 of the DPEIR in which the City states that the University CPU and Hillcrest FPA High Density Alternative is considered to be the environmentally superior alternative. As discussed in Section 6.C below, there is no evidence to support this conclusion. However, even if accepted, an environmentally superior alternative that relates only to the University Plan Update and Hillcrest Plan Amendment cannot be used for Blueprint SD, which covers the entire City. One of the most important aspects of an EIR is to identify an environmentally superior alternative, but the City failed to identify such an alternative for Blueprint SD, resulting in an incomplete analysis for this part of the “Project.” This demonstrates that the City was not serious in using this as a final environmental document for Blueprint SD. Thus, its inclusion in this DPEIR could only be to create confusion for the public.

Last, combining the University CPU and Hillcrest FPA High Density Alternative as the environmentally superior alternative suggests that these two projects must be considered as one when evaluated by the City Council. This is improper; each Plan Update should be given its own analysis and opportunity for consideration by both the community and the

City Council. The DPEIR is defective on its face for improperly combining these three projects into one DPEIR.

2. The Environmental Analysis conducted in Chapter 4.0 is inadequate.

The purpose of a Program EIR should be to evaluate the environmental impacts at full build-out so that each individual project does not have to conduct the same analysis, particularly for cumulative impacts from each project. For this approach to be effective, the original PEIR should conduct a complete analysis of impacts at full build-out. This does not occur in this DPEIR. As a result, each of the environmental analyses are ineffective and incomplete.

Furthermore, the DPEIR fails to adequately account for the impact of Complete Communities, which is a density bonus program. The DPEIR discusses that the University Plan Update proposes to add 29,000 housing units to the area; these would be added to the 28,000 currently adopted plan units (of which 26,520 are built), resulting in a total of 57,000 units. This would more than double the number of housing units in the community, which would likely more than double the total population in the community. These numbers will be significantly higher under the Complete Communities density bonus program. However, the environmental analyses conducted in Chapter 4.0 not only fails to adequately analyze impacts from complete build-out, it ignores the additional impacts that could result from the Complete Communities program. The DPEIR is inadequate for the University Plan Update and the Hillcrest Plan Amendment due to its failure to evaluate actual projected population numbers for each area, including population numbers arising from the Complete Communities program.

A. The environmental analysis of Aesthetics is inadequate.

1. Scenic Vistas

With respect to the University Plan Update, on page 4.1-15, the DPEIR states, “While it is unlikely that future development would result in a substantial adverse effect on a scenic vista, including the possible scenic overlooks identified on Figure 27 of the University CPU, it cannot be known at this program-level of review without site-specific plans. At this programmatic level of review, impacts associated with scenic vistas would be considered significant.” This is not an environmental analysis; this is an abdication of responsibility. The whole point of a Program Level EIR is to evaluate full impacts at build-out. The City knows the new zoning proposed in the University Plan Update and knows where new buildings and structures would be built if complete build-out were achieved. Under this DPEIR, the City must conduct an actual analysis of how many buildings might be

constructed and what their heights might be, and this evaluation must include consideration of the impact of the Complete Communities program.

Instead, the City did not even try to conduct such an analysis and simply declared the impacts significant, assuming that the City Council will simply adopt a statement of overriding consideration. This approach violates CEQA. California Code of Regulations (CCR) Title 14 §15121(a) states that an EIR is an informational document which will inform public agency decisionmakers and the public generally of the significant environmental effect of a project, identify possible ways to minimize the significant effects, and describe reasonable alternatives to the project. By failing to conduct an actual analysis of the number and heights of buildings that could impact scenic vistas, the DPEIR fails to provide the information necessary for both decisionmakers and the public to understand the true environmental impact of the University Plan Update on scenic vistas and other aesthetics, and fails to provide the underlying information necessary to adequately evaluate project alternatives.

It is also inadequate for the City to say that potential impacts to scenic vistas would be minimized through required compliance with the University Plan Update's proposed Supplemental Development Regulations (SDRs) and other regulations regarding transition requirements for certain types of development and development adjacent to open space zoned properties. These regulations change existing conditions; the point of the DPEIR is to evaluate environmental impacts from such changes. Even if the City believes that such changed regulations reduce environmental impacts, it is still required to evaluate the impacts from the changes. It is also inadequate for the City to rely on future project-specific environmental review as a means to mitigate any impacts. By engaging in a Program level EIR, future projects will **not** be subject to the same level of public input.

Furthermore, the plan policies in the University Plan Update are vague and unenforceable; almost all language actually *requiring* anything has been removed. For example, Policy 1.1C says, "Support strategies that provide transitions in scale, density, and intensity" "Consider the needs of families and children in the design for mixed used development projects" (Policy 1.1I.) "Encourage site design practices that take advantage of sunlight and prevailing breezes to provide a comfortable environmental in open space areas." (Policy 2.2C.) "Support design strategies that help to define the edges, boundaries, and transitions between private and public space areas. . . ." (Policy 2.2D.) "Promote attenuating noise through the use of berms, planting, setbacks and architectural design" (Policy 2.4C.) "Encourage a pattern and hierarchy of building massing and forms to help reduce the visual bulk of the development." (Policy 2.5A.) "Consider views into and from sloping areas. Encourage rooflines that emphasize the

variety in shape and flowing character of the hillside. Promote varying rooftop treatments on sloping sites over extended horizontal lines.” (Policy 2.7F.) “Promote minimizing the use of retaining walls” (Policy 2.7G.) “Encourage context-sensitive design by stepping back from the canyon edge” (Policy 2.9A.) “Promote design strategies that reduce light and glare on building frontages facing canyons and open space.” (Policy 2.9B.) “Promote strategies to transition height, density, and intensity between new development and existing residences.” (Policy 2.19D.) (Underline added to all policies for purposes of this letter; underlines not in the Plan Update document.)

As detailed above, all the language used in the plan policies is vague, unenforceable, and completely discretionary by a City who has developed a Plan Update that rejected almost all suggestions submitted by the community. And a review of the SDRs themselves show that they do not “support,” “encourage” or “promote” the plan policies, but actually impose minimal design requirements to achieve these goals. The City’s suggestion that future City (but not public) review and reliance on plan policies and SDRs will help mitigate impacts provides no actual binding mitigation of future impacts.¹

Finally, the City asserts that aesthetic and parking impacts of a residential, mixed-used residential, or employment center project on an infill site within a Transportation Priority Area (TPA) shall not be considered significant impacts on the environment. (P. 4.1-15.) It is important to note that some areas in the University area are designated as being in a TPA, but the current transit conditions (i.e., a certain level of bus service at the intersections of Governor Dr. and Genesee Ave. or at other locations along Governor Drive) do not meet the requirements to be a TPA, and there is no evidence that bus service will increase to achieve the requirements to be a TPA. The City should not be able to rely on this Public Resource Code exemption unless the area *actually* meets the definition of a TPA.²

¹ This issue is pervasive throughout the City’s environmental analysis. The City repeatedly suggests that reliance on “plan policies” can mitigate environmental impacts, but as demonstrated above, this approach is inadequate. This argument (that reliance on “plan policies” is insufficient to mitigate impacts) is applicable to all sections in the EIR where the City has relied on the argument that impacts will be mitigated by plan policies.

² Again, the City relies on this Public Resource Code exemption throughout its environmental analysis. This argument (that the City can rely on this exemption to not consider certain environmental impacts even at locations where the area does not currently meet the requirements of a TPA is insufficient to mitigate impacts) is applicable to all sections in the EIR where the City has relied on the argument that impacts need not be considered because the area is in a TPA.

The DPEIR is inadequate with respect to the University Plan Update because it fails to conduct an analysis that considers—at full build-out for the Plan Update—how many new buildings would be constructed, what the height of the new buildings might be, where would they be located, and what impact that construction would have on scenic vistas. A similar analysis including increased densities and building heights under the Complete Communities program must also be performed. Omission of this data results in an inadequate environmental analysis and leads to conclusions not based on evidence.

2. Visual Character or Quality of Public Views and Scenic Quality

The environmental analysis of impacts to visual character or quality of public views and scenic quality for the University Plan update is similarly deficient. On page 4.1-18, the City admits, “future development which utilizes the City’s Complete Communities Housing Solutions Regulations and/or the City’s Affordable Housing Regulations and associated density bonuses could have greater building heights and/or FAR over the City’s base zone regulations,” but the DPEIR ultimately concludes, “However, at this programmatic level of review without site specific plans, impacts would be considered significant.” This approach/conclusion by the City is inadequate and denies both the public and the City Council the necessary analysis required to make informed decisions.

Also, as discussed above, the City should not rely on the Public Resource Code exemption that it need not consider environmental impacts for areas in a TPA for areas that do not currently meet the requirements to be in a TPA. Until the areas actually meet the criteria of a TPA, the area is deserving of a full environmental analysis.

The DPEIR is inadequate because it fails to conduct an analysis that considers—at full build-out for the Plan Update—how many new buildings would be constructed, what their heights might be, where would they be located, and what impact that construction would have on visual character and scenic quality. A similar analysis including increased densities and building heights under the Complete Communities program must also be performed. Omission of this data results in an inadequate environmental analysis and leads to conclusions not based on evidence.

3. Light, Glare, or Shade

The environmental analysis of impacts to light, glare or shade for the University Plan Update is similarly deficient. On page 4.1-19, the City again simply states, “However, at this programmatic level of review without site specific plans, impacts with shade would be considered significant.” This approach is inadequate and denies both the public and the City Council the necessary analysis required to make informed decisions.

The City's suggestion that future City (but not public) review and reliance on Plan "policies" will help mitigate impacts provides no actual binding mitigation of future impacts.

The DPEIR is inadequate because it fails to conduct an analysis that considers—at full build-out for the Plan Update—how many new buildings would be constructed, what their heights might be, where would they be located, and what impact that construction would have on shade. A similar analysis including increased densities and building heights under the Complete Communities program must also be performed. Omission of this data results in an inadequate environmental analysis and leads to conclusions not based on evidence.

B. The environmental analysis for Air Quality is inadequate.

Some of the issues the DPEIR is supposed to evaluate for Air Quality impacts are:

- 1) whether the Project, at full build-out, would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under air quality standards;
- 2) whether the project would expose sensitive receptors to substantial pollutant concentrations; and
- 3) if the project would result in odors adversely affecting a substantial number of people. The DPEIR does not adequately analyze these issues for the University Plan Update because it fails to identify the number of new cars or vehicle miles traveled at the completion of full build-out.

Page 4.1-18 states that operational emissions are long term and include mobile and area sources including traffic generated by the project. The DPEIR then continues (p. 4.1-18 – 4.1-19) that the project would support additional development in the University Area, that anticipated development densities and intensities would exceed the densities currently anticipated in community plans, and that when increases in densities are proposed, operational emission impacts were found to be significant and unavoidable.

The City then asserts that the University project proposes development that would support the use of public transit, walking, bicycling, etc., but that "operational emissions are assumed to increase due to the increase in proposed densities and intensities." (P. 4.1-19.) Nowhere, however, does the City discuss the quantitative increase in operational emissions from project build-out. While more people moving into the higher density housing developments might use alternative forms of transit (other than cars), certainly

not all people will. For the University Plan, the Project proposes to add at least 50,000 new residents (based on 30,000 new housing units) at build-out. Even if 50% of those residents use alternative forms of transit (which we submit is an unrealistic assumption), that means 25,000 new residents would be using cars. Note: these excess cars do not include the cars associated with the Complete Communities density bonuses.

The DPEIR must include a quantitative analysis of how many new future residents are expected to drive cars and what the impacts on emissions and odors are on the surrounding community. Such quantitative analysis is imperative to understanding the true impacts of the Project, and to assist with a meaningful alternatives analysis.

The DPEIR is inadequate because it fails to include a quantitative analysis of how many new future residents are expected to drive cars in the University area and what the impacts from such new traffic has on emissions and odors impacting the surrounding community. Omission of this data results in an inadequate environmental analysis and leads to conclusions not based on evidence.

C. The environmental analysis for Biological Resources is inadequate.

To evaluate impacts on Biological Resources, some of the issues the DPEIR is supposed to evaluate are if the Project would have an adverse impact on sensitive habitats and if the Project would interfere substantially with the movement of any native wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. The DPEIR does not adequately analyze these issues for the University Plan Update because it fails to identify the impact on these biological resources due to the number of new residents in the area at the completion of full build-out.

Once again, the City includes its catch-all sentence that, “at a program level of review and in the absence of project specific analysis, it is unknown whether all impacts to sensitive plant species would be fully mitigated to a less than significant level. Therefore, at the program level of review, impacts to sensitive plant species resulting from project implementation would be significant.” This catch-22 cannot be allowed (i.e., that the City wants approval for a Program Level Project, but says it cannot do an impacts analysis at the Project Level because it needs specific projects).

Additionally, the University City area has numerous designated open spaces that the public uses for recreation such as Rose Canyon and Marian Bear Canyon. The DPEIR discusses the location of future development and the impact the placement of such development may have on biological resources. However, the DPEIR fails to discuss the impact on sensitive habitats and wildlife corridors that would occur by adding more than 50,000 new residents to the area. Based on the addition of new residents alone, Help

Save UC believes that the City's conclusion that the impact the Project would have on wildlife movement or wildlife corridors would be less than significant is incorrect. The addition of 50,000 (or more) new people living in a community, recreating in the canyons, and driving an unknown number of additional cars on adjacent streets, will most certainly have a significant impact on wildlife movement and corridors.

The DPEIR is inadequate because it fails to conduct an analysis of the impact that 50,000 new residents, and their associated cars, would have on sensitive habitat, wildlife movement and wildlife corridors. Omission of this data results in an inadequate environmental analysis and leads to conclusions not based on evidence.

D. The environmental analysis for Greenhouse Gas Emissions is inadequate.

To evaluate impacts from Greenhouse Gas Emissions, the City states that the following issues are to be addressed:

- 1) Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? and
- 2) Would the project conflict with the City's Climate Action Plan or another applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gasses?

The City's environmental analysis is inadequate because it fails to evaluate the first issue entirely.

The City asserts that for plan- and policy-level environmental documents, as well as environmental documents for public infrastructure projects, the City Planning Department prepared a Climate Action Plan Consistency Memorandum, dated June 17, 2022, to provide guidance on significance determination as it relates to consistency with the strategies in the Climate Action Plan. (Page 4.7-13.) The City then states that the City's guidance document requires environmental documents to address the way in which the plan or policy is consistent with the City's goals and policies. Moving to Section 4.7.4 of the DPEIR, on page 4.7-15, the City essentially declares that it is not required to evaluate the Project's net impacts on greenhouse gas emissions; all the City asserts it has to do is evaluate if the Project is consistent with the City's plans and policies.

Help Save UC disagrees with this conclusion and does not agree that under CEQA the City can simply decide that its obligations only require evaluation of consistency with plans and policies, not actual environmental impacts. To the extent the City believes prior state legislation allows circumvention of this requirement, Help Save UC believes that the City

is misinterpreting such statute and associated regulations. Second, the analysis proposed by the City is essentially identical to the second prong of impact analysis (does the project conflict with a plan or policy). This is non-sensical and an abandonment of the City's responsibilities under CEQA. Furthermore, this has led to an incorrect conclusion that the Project's impact on the environment from greenhouse gas emissions is less than significant. When an actual analysis occurs, it seems highly likely that the Project's impact on the environment from greenhouse gas emissions will be significant.

Indeed, there is no question that the Project will increase greenhouse gas emissions. The University Plan Update proposes to add more than 29,000 new housing units, not accounting for Complete Communities density bonuses. While nowhere in the DPEIR does the City acknowledge an estimated number of new cars on the road, most certainly there will be a net increase in vehicle usage and greenhouse gas emissions, and also increases in greenhouse gasses due to delays at intersections and cars sitting for longer periods of time due to traffic increases. Indeed, the City's Vehicle Miles Traveled (VMT) analysis for the University Plan Update says that VMTs associated with employment land uses would exceed the 85 percent threshold at buildout and therefore would exceed the City's proposed policies, and while VMTs per resident or employee might be reduced, the total number of residents and employees creating VMTs in the area will increase. (Appendix J to DPEIR, pg. 13.)

Finally, the City asserts that the University Plan update supports a multimodal strategy through improvements to increase bicycle, pedestrian, and transit access. (P. 4.7-20.) However, there is no requirement to actually implement these strategies. Many strategies require significant transportation upgrades, yet the Plan Update provides no mechanism to fund any of these upgrades, and the City Council has adopted new regulations that do not require that development impact fees be spent in the area where the impact has occurred. Instead, these fees go to a central fund to be spent anywhere in the City that the City deems appropriate. Thus, there is no requirement or guarantee that any of these strategies will be implemented to reduce greenhouse gas impacts.

Furthermore, the plan policies in the University Plan Update are vague and unenforceable; almost all language actually *requiring* anything has been removed. For example, Policies 3.5A, 3.5D and 3.5H discuss coordination and collaboration with MTS and SANDAG. Policies 3.5F and 3.5G state the Plan Update will "Support opportunities to enhance amenities with and around transit stations . . ." and "Support and encourage collaboration between business and UC San Diego to incorporate [transit] . . ." (Underline added.) Policies 3.5I and 3.5J state the Plan Update will "Promote public education [about transit] . . ." and "Prioritize transit connections . . ." Policy 3.7A "Encourage[s]

implementation or accommodation of infrastructure for electric vehicles” Policies 3.8A – D state the Plan Update will “Work with public and private entities to encourage [transit share programs”, “Encourage employers to participate in and inform employees [about transit programs”, “Coordinate with new development to post information [about transit programs”, and “Encourage unbundled parking to . . . encourage use of alternative transportation modes.”

All of the language in the plan policies are vague, unenforceable and completely discretionary by a City who has developed a Plan Update that rejected almost all suggestions submitted by the community. The City’s assertion that the University Plan Update supports a transportation strategy that will reduce impacts on greenhouse gas emissions is unsupported, as it relies on language that does not require anything to actually be implemented, nor does it state how any of the public transportation upgrades will be funded.

The DPEIR is inadequate because it fails to conduct an adequate analysis of the impact that the Project, especially the University Plan Update, will have on net greenhouse gas emissions, including but not limited to an increased number of cars and an increase of time waiting at intersections. Omission of this data results in an inadequate environmental analysis, leads to conclusions not based on evidence, causes incorrect conclusions regarding impacts on the environment, and provides insufficient information to the public and the City Council, precluding its ability to conduct an appropriate alternatives analysis.

E. The environmental analysis for Hydrology is inadequate.

To evaluate impacts to hydrology, some of the issues that the City is required to evaluate include if the project would:

- 1) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;
- 2) If the project would create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems; or
- 3) Provide substantial additional sources of polluted runoff.

The DPEIR fails to conduct an adequately analysis of either of these issues.

The City admits on page 4.9-42-43 that, “The alteration of drainage patterns and increase in runoff associated with the addition of impervious surfaces and structures can increase

the frequency and amount of flooding and potentially result in accelerating the rate of erosion and siltation through the watershed. . . . For larger projects involving substantial changes in drainage patterns, impervious surfaces, and resulting surface runoff, additional studies are required to determine compliance with the City's Stormwater Standards Manual as further detailed in Section 4.9.4, Issue 1."

With respect to the University Plan Update, the City is proposing densities that will more than double the population, not including the impact from Complete Communities. Projects proposed at the corner of Nobel and Genesee Avenues are already proposing to remove significant green areas, and propose to increase building heights by multiple hundreds of feet. Current stormwater standards allow each project to discharge at rates of up to 10% more than current conditions. The past two stormwater years (2022-2023 and 2023-2024) have demonstrated the impact of Climate Change, with rain events creating greater volumes of rain that occur with significantly greater intensity than in the past. Relying on current stormwater management guidelines is insufficient to declare that impacts on erosion, siltation, surface runoff and stormwater drainage systems would be less than significant, particularly given the cumulative effect of so many additional high rises envisioned by the Plan Amendment.

The City declares, "Furthermore, the City's Stormwater Department actively maintains and repairs the City's existing stormwater infrastructure to ensure adequate stormwater conveyance through implementation of the MWMP," (P. 4.9-44.) The events of this past year, particularly, January 20, 2024, suggest otherwise. Indeed, the City Council has proposed a November ballot measure to increase stormwater fees with a parcel tax. Councilmember Vivian Moreno was quoted as saying, "Funding for stormwater maintenance and infrastructure has never been sufficient in San Diego, and it's high time we do something about [it]." When discussing the parcel tax for stormwater maintenance, Councilmember Sean Elo-Rivera was quoted as saying, "City leaders have either willfully disregarded the necessary steps to provide folks with services and infrastructure they deserve, or have not been able to understand we simply don't have the revenue to pay for what our residents wants and deserve." (See San Diego Union Tribune, February 21, 2024, "San Diego's proposed flood prevention tax gets one step closer to November ballot.")

The City cannot, on the one hand, declare in the DPEIR that it provides sufficient stormwater maintenance such that it can more than double the density in a given area without even conducting an environmental impact study, but then on the other hand assert that it must add a new tax to pay for stormwater maintenance activities because the City does not have sufficient resources to provide adequate maintenance.

The DPEIR is inadequate because it fails to conduct an analysis of what the impacts on hydrology, especially for erosion, siltation, runoff, and stormwater drainage, will be on the University Plan area following the proposed increase in construction and density, especially given the City's admission that it has inadequate resources to provide necessary maintenance at this time.

F. The environmental analysis for Noise is inadequate.

The City admits that impacts relating to construction noise would be potentially significant (p. 4.11-15), that impacts relating to stationary sources would be potentially significant (p. 4.11-19), and that the increased traffic-generated noise could result in an increase in ambient noise levels resulting in a significant impact (p. 4.11-19). See also pages 4.11-22-23.

Despite these admissions, nowhere does the City conduct a quantitative analysis of, for example, how many more cars are expected on the road in the University Plan area, and what would be the permanent increase in traffic-related noise. The City asserts that the project is intended to support a shift from vehicle traffic toward transit, pedestrian, and bicycle, but the possibility of some percentage of new residents using these alternative forms of transit does not erase the overall impact that will occur by adding more than 50,000 new residents to an area. It is also important to note that while the University Plan update might encourage building materials for new projects to reduce noise impacts, such regulations do nothing to mitigate the increased noise on wildlife or existing residents. (It is also interesting to note that the DPEIR admits impacts on both air quality and noise from an increase in vehicle traffic, but somehow there are no impacts to greenhouse gas emissions.)

The DPEIR is inadequate because it fails to conduct an adequate analysis of the impact on the environment in the University Plan area from the increase in construction noise, non-transportation noise, and traffic-related noise resulting from the increase in construction, density, and new residents proposed in the University Plan Update. Omission of this data results in an inadequate environmental analysis, leads to conclusions not based on evidence, and provides insufficient information to the public and the City Council, precluding the ability to conduct an appropriate alternatives analysis.

G. The environmental analysis for Public Services is inadequate.

The City states that the, "proposed University Plan update would result in a potential buildout of an additional approximately 57,000 dwelling units, or approximately 30,480 additional dwelling units compared to the existing condition." (P. 4.12-34.) The City should clarify this sentence: does the City propose an additional 57,000 dwelling units,

or is it a buildout of a total of 57,000 dwelling units with an additional 30,480 dwelling units. The City then continues that, “The increase in residential density and associated demand for fire-rescue services could require the provision of new and/or improved fire stations and fire apparatus in order to maintain fire-rescue service ratios, response times, and other performance objectives” (P. 4.12-34-35.) The City then asserts that the construction and operation of such new fire stations would result in environmental impacts, but that an environmental review would occur at the time of construction. This is inadequate.

It is clear that doubling the density in the University Plan area will of course require additional fire-rescue services. The City must do an analysis *now* to determine a) where additional stations could be built; or b) could existing stations be expanded in their current locations as necessary to support future demand? And if so, what will the environmental impacts of such construction and operations be? There is no sensible reason to wait for this analysis, and the City’s failure to include such analysis renders the DPEIR inadequate. In order for the City and the public to be adequately informed of the environmental impacts of the proposed Plan Update, such analysis should occur now to ensure that future fire-rescue services can be provided and to adequately advise the City Council and the public of what the environmental impacts of such additional construction and service will be.

The City’s analysis of police services (p. 4.12-36-37), schools (p. 4-12.-41-42), libraries (p. 4.12-44) and cumulative impacts (p. 4.12-44) are similarly inadequate. The San Diego Unified School District has clearly indicated that the University community will need more elementary schools and that the City should identify possible sites for such schools, but the City fails to do so. The City fails to conduct any actual analysis of what the University community will look like at full build-out following the Plan Update, but says it wants to wait to see what is actually built. Of course, after approving a program level EIR, no actual environmental analysis will then be required in the future. This approach to the DPEIR is inadequate, omits critical data for the public and City Council to evaluate the projects and appropriate alternatives, and leads to conclusions not based on evidence.

H. The City’s environmental analysis on Recreation is inadequate.

The DPEIR discusses that the City has abandoned its prior Parks Master Plan, which requires a certain amount of parkland per resident, and transitioned to the “Recreational Value-Based Park standard” which now uses a points system to evaluate parks. The DPEIR is inadequate because it fails to acknowledge that the City has abandoned its prior Parks Master Plan that acknowledges that a certain amount of land (acres) per resident is prudent and required to support adequate recreation systems. The DPEIR also is

inadequate because it fails to include an analysis of the extent to which the University Plan Update will be unable to meet or be inconsistent with the City's Parks Master Plan, which requires certain acres of parkland per resident. Failure to include this analysis provides inadequate information to the public and the City Council, and eliminates the ability to conduct an appropriate alternatives analysis.

The DPEIR is also inadequate as it relies on potential parks that are not located near residences and those where it is unclear if the public will actually be able to access such parks (e.g., the Jewish Community Center and the possible park located amidst hospitals).

I. The City's Transportation environmental analysis is inadequate.

Similar to the Greenhouse Gas Emissions analysis, the City decided that it does not need to evaluate for total impact on the area due to an increase in traffic. The City asserts that prior legislation and the City's 2022 analysis allows it to disregard net traffic impacts (i.e., the additional number of cars on the road) and only look at whether the project will increase or decrease Vehicle Miles Traveled (VMTs) on a per capita basis. Help Save UC disagrees that prior legislation and the City's 2022 CEQA Significant Determinations Thresholds allows the City to skip such crucial analysis. The DPEIR is inadequate because it fails to evaluate the environmental impact of the overall net increase in traffic due to a proposal that will likely more than double the population of the University area.

Second, the DPEIR is inadequate because it fails to adequately complete an appropriate VMT analysis. First, the VMT analysis relies on 2016 data, which is already 8 years out of date and does not provide accurate conclusions. Second, the VMT analysis assumes that SANDAG will implement the 2050 Regional Plan, but the City acknowledges that, "it cannot be ensured that full implementation of the Regional Plan's transportation investments will occur." (Appendix J, p. 13.)

Furthermore, the DPEIR fails to discuss impacts on the environment from the possibility that even if VMTs per resident decrease, this does not account for time required to complete such VMTs. For example, if 20,000 new cars are on the road in the University area, the total miles traveled by each car might be less, but there is a likelihood that the time to travel such miles will increase, including times waiting at intersections and time waiting for scarce parking spaces, causing impacts to Air Quality, greenhouse gas emissions, and overall impacts on transportation.³

³ The authors of this letter are not planning or land use professionals nor CEQA lawyers. To the extent an issue of adequacy is raised in one section (for example, a section discussing inadequate analysis of transportation impacts), but the concerns overlaps to other areas (such as air quality

The DPEIR is also inadequate with respect to analysis of specific area changes. For example, the University Community Plan Update relies on the installation of “mobility hubs”, but nowhere in either the Plan Update or the DPEIR is there a discussion of what these hubs will look like, whether there is land available for such hubs, or how they will actually work. The University Community Plan Update also proposes to reduce Governor Drive to one lane, but fails to conduct any sort of traffic study or analysis. There is also no analysis of how the reduction of Governor Drive to one lane can accommodate emergency access vehicles when the Plan proposes to add more than one thousand dwelling units to the South University Community area. The City failed to conduct a traffic study based on these proposed changes, but somehow concluded that impacts related to ensure emergency access to the South University Community area (or the University Community area in general) would be less than significant. Omission of this data results in an inadequate environmental analysis, leads to conclusions not based on evidence, and provides insufficient information to the public and the City Council, precluding the ability to conduct an appropriate alternatives analysis.

J. The City’s environmental analysis of Wildfire impacts is inadequate.

The majority of the University area is located in a very high fire hazard severity zone. (Pg. 4.18-16.) The City then advises the reader of the DPEIR to “Refer to Section 4.18.2.3c for details about local evacuation procedures.” (Pg. 4-18-21.) However, Section 4.18.2.3c is simply one paragraph, which states that the San Diego Fire Department conducts a survey of subdivisions of more than 30 dwelling units that are at significant fire risk. “This program is intended to identify areas of concern relating to the ability of emergency personnel to access an area and to evacuate community members safely and efficiently in the event of an emergency.” (Pg. 4.18-22.) Thus, the City does not actually conduct an analysis to determine if, once the community is at full build-out, an area can be adequately evacuated. The City simply states that another department is supposed to conduct an evaluation, but there is no discussion of whether such evaluation has occurred, or what the results of such evaluation were. This is an inadequate analysis of whether the University community can be safely evacuated during a wildfire following full project build-out.

Furthermore, on pg. 4.18-30, with respect to the University area, the City simply states that, “there are adequate evacuation routes within the CPU area in the event of an emergency.” However, there is no discussion of the evacuation routes or what the

or greenhouse gas emissions), the fact that the issue has been raised under a heading for a certain area (transportation) does not limit the objection to the EIR to such a specific area.

impacts on such routes might be by more than doubling the population in the area, or reducing Governor Drive to one lane. Failure to include such analysis renders the City's evaluation of wildfire impacts inadequate.

3. The City's Conclusion that there will be no adverse impacts to Population or Housing is incorrect.

In Section 5.3, the City asserts that, "No adverse impacts to population or housing are anticipated from implementation of the project" because "development under the project would not support unplanned population growth." (Pg. 5-3.) The DPEIR is inadequate because, for all of the reasons stated above in Section 2, the City completely fails to properly plan for population growth by failing to adequately analyze various environmental impacts, including failure to identify future sites for fire and police stations, future schools or adequate parks.

The City also states that, "It is anticipated that most of the new housing units would be absorbed by existing residents of the San Diego area and would assist in accommodating project population growth that would occur without the project." (Pg. 5.3.) The DPEIR is inadequate because this statement is unsupported. The City fails to acknowledge that population numbers have stagnated or actually decreased over the past few years. The City also fails to account for the fact that significant population growth in the University area is due to the increased number of students attending the University of California, San Diego, and fails to account for the additional housing being built on the campus by the University.

The City further states that, "The number of additional housing units and the corresponding forecasted number of new residents is not substantial and would contribute to the housing provisions goals of the City's General Plan Housing Element by helping to accommodate regional growth projected for the project areas, the City, and the region as a whole. Therefore, the project is not anticipated to result in overall regional population growth, and there would be no population and housing related impacts." (Pg. 5-3.) This sentence highlights the problem of combining the Blueprint San Diego project with the regional Plan Update for the University area. While the entire Blueprint San Diego project might not cause a substantial increase in new residents, certainly the same cannot be said for the University Plan Update which proposes to double the housing units, and therefore more than double the population, for the University area. Doubling the housing and population in a specific community is a substantial increase. The City's failure to acknowledge this issue and evaluate it separately makes evaluation of this issue inadequate for the purposes of the University Plan update.

Finally, the City states that the City's target for the 2021-2029 Housing Element cycle is 108,035 housing units. (Pg. 3-4.) If one were to assume that the same number of housing units would be needed for 2030-2039 and 2040-2050, then a total of 324,105 housing units would be needed for the City of San Diego by 2050 (which is the timeline for the University Plan Update). However, recent data indicates that population numbers for the City are stagnant and/or decreasing and this number might actually be less. Regardless, assuming that the 324,105 new housing units number by 2050 is correct, then the addition of 30,430 housing units in the University area allocates approximately 10% of all housing units to be borne by the University area, despite the fact that the City of San Diego has 52 community planning areas. If the total number of housing units were divided among the 52 community planning areas, each planning area would be asked to add only 6,232 housing units until 2050. The University Plan Update asks the University area to add more than 5 times that number – and this is excluding the likely additional housing units that can or will be added under the Complete Communities program.

The DPEIR is inadequate in that it fails to analyze why the University Area must absorb so many more housing units than other communities. Proximity to transit could account for some additional units, but given the University Plan Update's proposal to more than double the number of housing units, and thus at least double the population, the DPEIR must provide an adequate analysis of why the number of additional housing must be added to the University area, and why housing units cannot be distributed more evenly across the 52 community planning areas. Failure to provide this analysis renders the DPEIR's analysis of housing impacts inadequate.

As a final note, Help Save UC objects to the City's failure to require onsite affordable and low-income housing. The historical practice of allowing developers to pay in-lieu fees has not created enough affordable housing in the City. Help Save UC believes that the City's housing crisis is an affordable housing crisis. As detailed in the April 14, 2024 San Diego Union Tribune Article, "Rent Increases Wane," apartment complexes in the City of San Diego with average rents of approximately \$3,000/month for a one- bedroom apartment have vacancy rates ranging from 16–26 percent. The housing crisis is actually a desperate need for moderate- and low-income housing. The City's failure to require such on-site housing units with each project will simply add high income housing stock, but will do little to address the critical need for moderate and low income housing.

4. The City's analysis of Growth Inducement is incorrect.

For the same reasons as discussed in Section 3, above, the City's analysis of whether the proposed project could foster population growth and the impacts such growth may have by taxing existing community services facilities (Chapter 6.0) is inadequate. The

University Plan Update may assist the City in adding new housing units, however, the DPEIR is inadequate due to its failure to adequately analyze the impacts on the University community, its services, and the environment due to the City's unexplained decision to place a disproportionate number of housing units in the University area.

5. The City's analysis of significant unavoidable impacts / significant irreversible environmental changes is inadequate.

The City's analysis of Significant and Unavoidable Impacts is inadequate. First, the City admits that, of the 18 categories of environmental issues to be evaluated, 12 of those 18 have significant and unavoidable impacts. One of the six categories for which the City asserts there are not significant impacts is greenhouse gas emissions. As discussed above, the DPEIR is inadequate in its analysis of greenhouse gas emissions, and a proper evaluation will demonstrate that the project would have significant impacts on greenhouse gas emissions, at least for the University community area.

However, for the same reasons as discussed in Sections 3 and 4, the City's analysis that significant and unavoidable impacts will occur is inadequate because the City has improperly and inadequately determined that a disproportionate number of housing units should be placed in the University community area. A proper and adequate analysis of where housing units could be placed throughout the 52 community planning areas in the City of San Diego might have resulted in a fair distribution of housing units across the City. Again, it is possible that more units might be placed in the University community area due to proximity to transit, but the City has provided no analysis or justification as to why 10% of housing units over the next 30 years must be placed in just one of 52 communities. The DPEIR is inadequate for its failure to conduct this analysis, as a proper analysis might very well have resulted in a project that resulted in fewer areas of significant and unavoidable impacts. Indeed, many of the impacts could have been avoidable with a proper analysis.

6. The City's Evaluation of Project Alternatives is inadequate and its conclusions are not based on evidence.

A. The City's selected alternatives are not reasonable.

CEQA Guidelines clearly state requirements for how the City must conduct the analysis of project alternatives. CCR Title 14 Section 15126.6 states, in relevant and selected parts:

- (a) An EIR shall describe a range of reasonable alternatives to the project . . . which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the

comparative merits of the alternatives. An EIR . . . must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. . . . The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives.

(b) [A]n EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment . . . the discussion of alternatives shall focus on alternatives to the project . . . which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives

(c) The range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects. The EIR should briefly describe the rationale for selecting the alternatives to be discussed.

(f) The range of alternatives required in an EIR is governed by a “rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead agency could feasibly attain most of the basic objectives of the project.

The DPEIR alternatives are:

- 1) No Project Alternative;
- 2) University and Hillcrest High Density (HD) alternative;
- 3) Blueprint SD Distributed Growth Alternative; and
- 4) Blueprint SD Initiative Reduced Density Alternative.

On pages 8-1 – 8-3 of the DPEIR the City lists the projects goals and objectives. However, the DPEIR does not provide any specific discussion regarding how or why it selected each of the specific alternatives considered.

First, the Blueprint SD Initiative Distributed Growth Alternative is not an alternative for either the University Plan Update or Hillcrest Plan amendment. The City states, “The University CPU and Hillcrest FPA would remain the same as in the proposed project in this alternative.” (Pg. 8-29.) Thus, for the University Plan update, this is not an alternative.

Second, the Blueprint SD Initiative Reduced Density Alternative is not a reasonable alternative. The Blueprint SD Initiative that is part of the “project” as defined by the DPEIR, “includes adoption of the Hillcrest FPA and the University CPU.” (Pg. 1-1.) Thus, under the Blueprint SD Initiative itself, there is no different analysis for the University Plan Update. Under the Blueprint SD Initiative Reduced Density Alternative, “the General Plan Land Use and Community Planning Element Figure LU-1 would be amended to reduce the overall density allowances within the Climate Smart Village Areas.” (Pg. S-7.) However, unlike the High Density Alternative and the Blueprint SD Initiative Distributed Growth Alternative, figures of which are provided to show the land use applications and zoning densities (see Figures 8-1 and 8-3), the DPEIR provides no figures nor specific discussion of the Blueprint SD Initiative Reduced Density Alternative that explains where the reduced density would be in the University area. In fact, the word “University” does not appear at all in the discussion for the Blueprint SD Initiative Reduced Density Alternative. (See Section 8.4.) There is simply no way for a reader of the DPEIR to understand the difference between the University Plan Update as proposed in the Project, and how the University area would change under the Blueprint SD Initiative Reduced Density Alternative.

“An EIR . . . must consider a reasonable range of potentially feasible alternatives that will foster informed decisionmaking and public participation. . . .” Section 15126.6(a). The DPEIR provides no way for either a decisionmaker or the public to understand how the University Plan Update as proposed in the Project differs from the proposed density in the University area in the Blueprint SD Initiative Reduced Density Alternative. The Blueprint SD Initiative Reduced Density Alternative is not a reasonable alternative when the DPEIR fails to provide any specific discussion that would allow a decisionmaker or the public to compare the two alternatives.

Finally, the DPEIR’s failure to provide any specific discussion regarding how or why it selected each of the alternatives considered is particularly concerning with respect to the decision to use the University and Hillcrest High Density alternative. The City’s Planning Department proposed this High Density alternative for the Plan Update in February 2022. However, the City removed this alternative from consideration in November 2022 and circulated two new alternatives for consideration: A) Scenario A, which is similar to the current proposed University Plan Update / the Project; and B) Scenario B, which proposed to add approximately 22,000 new housing units (less than the 30,000 housing units proposed the Project). The representation to the public was that the High Density alternative was not going to be considered further for the University Plan Update.

Instead, the City indicated that Scenario B, which became the Community Planning Group Subcommittee Input Scenario, would be the alternative evaluated. In fact, the Community

Discussion Draft of the Plan Update issued in April 2023 included a page called “Community Planning Group Subcommittee Input Scenario.” This page said, “The Community Planning Group Subcommittee Input Scenario was developed to reflect early feedback collected from the University Community Planning Group Subcommittee meetings. This scenario will be considered throughout the Environmental Review process . . .” (See April 2023 University Community Plan and Local Coastal Plan, Community Discussion Draft, pg. 204 of the pdf print version of the document; the page is numbered (apparently incorrectly) 30 in the left-hand corner, underline added.) Not only did the City renege on its promise to the community that the lower density Scenario B would be the scenario considered in the Environmental Review process, it provides no explanation as to why it chose to select a High Density alternative removed from consideration for the Plan Update instead of the lower density alternative (Scenario B) that was the community preferred alternative.

The alternatives “shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” Section 15126.6(f). “The discussion of alternatives shall focus on alternatives to the project . . . which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives . . .” Section 15126.6(b). A lower density alternative such as Scenario B (the community preferred alternative) could have lessened significant effects of the project while still achieving project goals, but was not considered as an alternative. On the other hand, the High Density alternative was considered and was found to have greater impacts than the Project. This does not comply with CEQA regulations. An alternative that is capable of avoiding or substantially lessening significant effects of the project, i.e., a lower density alternative, should have been considered.

Furthermore, CEQA regulations repeatedly state that alternatives should be feasible. (Section 15126.6(a), (c), (f).) However, Section 8.2.3 of the DPEIR states, “While this [High Density] alternative would achieve the project objectives to the same degree as the project, it was not selected as the project due to unlikelihood that development at the higher intensities would be feasible and actually implemented.” It was therefore improper and contrary to CEQA guidelines for the City to use the High Density option as an alternative as the City has determined it was not feasible. Furthermore, the City’s conclusion that the High Density option is likely not feasible raises these important questions: At what level of density is the project feasible? Where is the City’s analysis that the project is feasible for the University Plan update when the High Density option is not?

In conclusion, the DPEIR is inadequate because it did not provide reasonable and feasible alternatives for consideration as required by CEQA.

B. The City's inadequate environmental analysis results in an inadequate analysis of project alternatives.

As discussed in Section 2, above, the City fails to conduct an adequate analysis of the environmental impacts in multiple areas. This failure leads to an omission of critical data which leads to faulty conclusions not based on evidence. Thus, it is impossible for the public and the decisionmakers to conduct an appropriate alternatives analysis when the underlying analysis is faulty.

Furthermore, the analysis conducted of each of the alternatives is inadequate. For example, the VMT analysis is only conducted for the project; there are no VMT analyses for any alternatives. However, despite the lack of data, and the admission that, "The increased residential and non-residential development capacity under this [High Density] alternative could result in greater emissions of GHGs due to greater density and associated vehicles trips" (p. 8-22), the City concludes that, "GHG emissions [under the High Density alternative] are assumed to be similar to the project." (P. 8-23, underline added.) The City has no basis to make this assumption.

For the High Density alternative, the City concludes that some impacts would be significant and greater than the project (see aesthetics, p. 8-19, air quality, p. air quality, p. 8-20, noise, p. 8-24-25; wildfire, p. 8-28). However, for some areas, the City concludes that the impacts are significant and the same as the project, but there is no basis for this conclusion. For example, for biological resources, the City simply says, "like the project, impacts to wetlands under this alternative would be significant." (P. 8-20.) But there is no analytical discussion demonstrating that the level of impact would in fact be the same. This same problematic analysis occurs for hydrology (p. 8-24), public services (p. 8-25), and recreation (p. 8-25). But it is non-sensical to accept that the same level of impact will occur on public services and recreation when the project proposes to add approximately 30,000 new homes to the University area, but the High Density alternative proposes to add 57,000 new homes to the University area, especially when there is simply no space for any additional meaningful park space.

The DPEIR is inadequate because the comparison of impacts between the project and the High Density alternative omits critical data and the conclusions of this comparison are not based on evidence.

C. The City's conclusion that the High Density alternative is the environmentally superior alternative is not based on evidence.

CEQA Guidelines Section 15126.6(e)(2) requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR.

In Section 8.2.3., the Conclusion to the City's comparison of the Project to the University and Hillcrest High Density Alternative, the City states, "No significant impacts of the project would be completely avoided by this [High Density] alternative and on the balance, impacts would slightly increase compared to the project." (Underline added.) Thus, the City clearly concludes in Section 8.2.3 that environmental impacts would increase under the Higher Density alternative.

This is supported by Table 8-1, which compares the impacts of the alternatives. If the reader accepts the City's conclusions, the Project has 12 environmental areas that have significant impacts and 6 areas where the Project has less than significant impacts. For the University High Density alternative, if the reader accepts the City's conclusions, there are 10 environmental areas where the impacts are the same for the Project and the High Density alternative (7 are significant, 3 are less than significant). In four categories, the City finds that both the Project and the High Density alternative have significant impacts, but the impacts from the High Density alternative are even more significant than the impacts from the project. In one category, the City finds that both the Project and the High Density alternative have a significant impact, but the High Density alternative significant impact is slightly less. And finally, for three categories, the City finds that both the Project and the High Density alternative have less than significant impacts, and the High Density alternative impacts are less.

Thus, mathematically speaking, both alternatives are the same for 10 categories. For 4 categories, the High Density alternative has greater impacts, and those impacts are significant. For 4 categories the High Density alternative has lesser impacts, but 3 of those are in categories where both projects have less than significant impacts. Thus, by the City's own analysis, the High Density alternative has more significant impacts.

However, the City concludes in Section 8.5 that the "University CPU and Hillcrest FPA High Density Alternative is considered to be the environmentally superior alternative, based on a comparison of the alternatives' overall impacts and their compatibility with the project goals and objectives. While the University CPU and Hillcrest FPA High Density Alternative would not eliminate any significant impacts of the project, it would reduce the significance of impacts in comparison to the project." This conclusion is in direct conflict with the conclusions in Section 8.2.3 (where the City found that the High Density

alternative had greater environmental impacts than the Project) and is contrary to the results of Table 8-1. Furthermore, the City also provides no discussion nor evidentiary support for the assumed conclusion that somehow the alternatives' overall impacts and compatibility with the project goals and objectives must outweigh the greater environmental impacts found in Section 8.2.3 and Table 8-1. Finally, once the City actually performs the appropriate environmental analysis, it will be clear that higher density alternatives (with a higher number of residents), and the increase in greenhouse gas emissions for higher density will have a greater environmental impact.

Thus, the DPEIR is inadequate because it a) provides conflicting statements regarding which alternative is environmentally superior; and b) provides no evidence to support the City's arbitrary conclusion that the High Density alternative is the environmentally superior alternative.

Help Save UC recommends that the DPEIR be revised to redo the analysis of the environmentally superior alternative as it is clear that the conclusion that the High Density alternative is the environmentally superior alternative is in direct conflict with Section 8.2.3 and Table 8-1 of the DPEIR and is not based on evidence.

D. The City's failure to designate an environmentally superior alternative for Blueprint SD renders the EIR inadequate for Blueprint SD.

CEQA Guidelines Section 15126.6(e)(2) requires the identification of an environmentally superior alternative among the alternatives analyzed in an EIR.

The Project includes three separate projects: 1) Blueprint SD; 2) the Hillcrest Plan Amendment; 3) the University Plan Update. The three projects are not related and should have been evaluated separately. Regardless, the DPEIR (erroneously) identifies the Hillcrest and University High Density alternative as the environmentally superior alternative. As this alternative only considers two areas of the City of San Diego, this conclusion cannot be used to support the Blueprint SD project for the entire City of San Diego. As a result, the DPEIR does not identify an environmentally superior alternative for Blueprint SD, and therefore the DPEIR does not satisfy the requirements of Section 15126.6(e)(2).

Help Save UC recommends that the DPEIR be revised to remove Blueprint SD from the document as the document clearly does not meet CEQA requirements for Blueprint SD.

7. Conclusion.

The DPEIR is inadequate because it falls short of the required informational document that is required to inform public agency decisionmakers and the public of the significant environmental effects of the project and to discuss whether there are feasible and reasonable alternatives that could reduce the significant effects that the project will impose in the University community.

The City's approach to combine the Blueprint San Diego project, the Hillcrest Plan Amendment and the University Community Plan Update into one document created a document that was designed to confuse and discourage the public from providing input on this analysis. The City's failure to identify an environmentally superior alternative that can be used to support a selection of a Blueprint SD project, a required element of an EIR, shows that the City did not intend to use this document to move the Blueprint SD project forward.

Second, the DPEIR's environmental analyses of multiple issues is inadequate and does not lead to conclusions based on evidence.

Third, the DPEIR is inadequate because it does not provide reasonable and feasible alternatives for comparison, again leading to conclusions not based on evidence.

Finally, the City's selected environmentally superior alternative conflicts with its own findings in the DPEIR and is not based on evidence.

The DPEIR is inadequate to support the proposed University Community Plan Update and fails to provide the public with a true analysis of environmental impacts from this proposed Plan update, an analysis that both the public and decisionmakers deserve.

Sincerely,

Members of Help Save UC, including:

Andrew Barton

Linda Beresford

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cc: Mayor Todd Gloria
Councilmember Joe LaCava
Councilmember Kent Lee
Suchi Lukes
Chris Nielsen
Andy Wiese